

Congress of the United States
House of Representatives
Washington, DC 20515-3102

August 7, 2017

Göran Marby
President and CEO
The Internet Corporation for Assigned Names and Numbers
801 17th St. NW, Suite 400
Washington, DC 20006

Mr. Marby:

We write today to voice concern regarding recent actions by the Internet Corporation for Assigned Names and Numbers (ICANN) regarding generic top-level domain strings (gTLDs) regulations. By their very nature, gTLDs pose a far greater risk to the public than standard internet domains. As a result, we ask for the immediate review of the policies surrounding gTLDs to ensure the highest level of safety and accountability possible.

As you know, the April 11, 2013 communique by ICANN's Governmental Advisory Committee (GAC) identified several gTLDs that are linked to regulated or professional sectors. The GAC recognized that "these [gTLDs] are likely to invoke a level of implied trust from consumers, and carry higher levels of risk associated with consumer harm." Further the communique highlighted that gTLDs such as ".cpa" could be used to deceive consumers of CPA services in the United States and around the world if granted to those outside the global CPA community.

Ultimately this communique by the GAC recommended ICANN "[e]stablish a working relationship with the relevant regulatory, or industry self-regulatory, bodies, including developing a strategy to mitigate as much as possible the risks of fraudulent, and other illegal, activities," and specifically cited ".cpa" as requiring "Category 1" safeguards.

Unfortunately, to date, ICANN has not fully implemented this recommendation. While it has taken steps in the right direction, gTLDs, such as .cpa, are still not regulated in a way to prevent fraud and abuse. For a gTLD that has a strong connection to a regulated industry, such as ".cpa," the protection of the public against fraud or other illegal activities should be of paramount concern to ICANN. Strong, reliable verification procedures are essential to protect the public interest. The importance of the public trust to the CPA profession around the world cannot be overstated, and the potential harm to the public of fraudulent or illegal use of a ".cpa" domain is immense.

Therefore, we strongly encourage ICANN, at a minimum, to develop and promulgate verification procedures for gTLDs such as ".cpa." ICANN cannot combat fraud by simply requiring applicants to make a representation, without any verification. We recognize that although such verification is not a simple task, but it is an essential one.

Once again, we urge ICANN to develop and promulgate verification regulations for Category 1 gTLDs that are at greatest risk to fraud and abuse, such as “.cpa”. Thank you in advance for your attention and response to this letter.

Sincerely,



Steve Pearce
Member of Congress



Michael Conway
Member of Congress



Steve King
Member of Congress



Ruben Kihuen
Member of Congress