## **GAC Advice Response Form for Applicants**



The Governmental Advisory Committee (GAC) has issued advice to the ICANN Board of Directors regarding New gTLD applications. Please see Section IV, Annex I, and Annex II of the GAC Beijing Communique for the full list of advice on individual strings, categories of strings, and strings that may warrant further GAC consideration.

Respondents should use this form to ensure their responses are appropriately tracked and routed to the ICANN Board for their consideration. Complete this form and submit it as an attachment to the ICANN Customer Service Center via your <u>CSC Portal</u> with the Subject, "[Application ID] Response to GAC Advice" (for example "1-111-11111 Response to GAC Advice"). All GAC Advice Responses must be received no later than 23:59:59 UTC on 10-May-2013.

## **Respondent:**

Applicant Name	American Council of Life Insurers
Application ID	1-1160-79590
Applied for TLD (string)	LIFEINSURANCE

## Response:

American Council of Life Insurers ("ACLI") is a Washington, D.C.-based trade association representing an industry with more than 200 years of experience providing financial security to families, workers, and businesses. With more than 300 legal reserve life insurer and fraternal benefit society member companies operating in the United States, ACLI members represent more than 90% of the assets and premiums of the life insurance and annuity industry. In addition, ACLI member companies offer pensions, 401(k) and other retirement plans, long-term care and disability income insurance, and reinsurance. Our members' products help protect 75 million American families against economic uncertainty – providing peace of mind, long-term savings, and a guarantee of lifetime income when it is time to retire.

ACLI advocates the shared interests of our member companies and their policyholders before state, federal, and international legislators and regulators. By promoting sound public policy on issues important to the life insurance industry, such as financial services reform, retirement security, and taxes, ACLI aims to protect both our members and their customers. (1)

ACLI would like to affirm to the ICANN Board our commitment to operating the .LIFEINSURANCE gTLD in a manner that reflects our longstanding commitment and history of advocating for families that rely on life insurers' products for financial and retirement security in federal, state, and international forums for public policy.

In line with the core mission of supporting the industry marketplace and the 75 million American families that rely on life insurers' products for financial and retirement security, ACLI intends to operate the .LIFEINSURANCE gTLD as a trusted, hierarchical, and intuitive namespace for a self-defined community of organizations. In doing so, ACLI can ensure that all operations within the gTLD will be conducted in line with a strict code of conduct that includes prohibitions against:

- Counterfeiting, piracy, and other forms of intellectual property theft,
- Phishing or other forms of online fraud,

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- The distribution of malware or operation of botnets, and
- The provision of incomplete or inaccurate WHOIS information.

In addition, ACLI plans to implement a restricted registration model, wherein registration is limited to ACLI members in good standing with policies set forth in our charter. By using a controlled registration policy, ACLI aims to create a safe online space for consumers and insurance providers, free from many of the risks associated with conducting business and research online. The public will benefit from the existence of a safe space to provide and exchange authoritative information regarding life insurance products, and potentially annuities, pensions, 401(k)'s, and other retirement plans, long-term care, disability income insurance, and reinsurance. Additionally, a restricted registration policy will help to ensure that any financial data collected in .LIFEINSURANCE is done in accordance with online privacy and security standards.

The Governmental Advisory Committee's Beijing Communiqué identifies the "Financial" sector, including .LIFEINSURANCE, as a regulated sector to which additional safeguards should apply and advises that "for strings representing generic terms, exclusive registry access should serve a public interest goal." We hope this quells any concerns that the Board might have in association with the .LIFEINSURANCE gTLD.

We invite further dialogue with the Board if it has any remaining concerns regarding ACLI's .LIFEINSURANCE application.

(1) For instance, ACLI has worked across the United States to enact legislation to deter abusive stranger-originated life insurance (STOLI), and other activities that may expose policyholders to increased risk of fraud. See more information:
<http://www.acli.com/Issues/Pages/Default.aspx>