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 Communiqué 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 CSC Portal 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:**

<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Safeway Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application ID</td>
<td>1-1189-31055</td>
</tr>
<tr>
<td>Applied for TLD (string)</td>
<td>.GROCERY</td>
</tr>
</tbody>
</table>

**Response:**

Safeway Inc. (“Safeway”) would like to affirm to the ICANN Board our commitment to operating the .GROCERY gTLD in a manner that reflects our longstanding history of corporate responsibility.

Safeway Inc. (“Safeway”) is one of the largest food and drug retailers in North America. As of December 31, 2011, the company operated 1,678 stores in the United States and in western Canada. In support of its stores, Safeway has an extensive network of distribution, manufacturing, and food processing facilities. Safeway owns and operates GroceryWorks.com, LLC, an Internet grocer doing business under the names Safeway.com and Vons.com. Through its subsidiary, Blackhawk Network Holdings, Inc., Safeway provides third-party gift cards, prepaid cards, telecom cards, and sports and entertainment cards to retailers in North America, Europe, Australia, and Japan. Safeway also holds a 49% interest in Casa Ley, S.A. de C.V., a food and general merchandise retailer with 185 stores in western Mexico.

In line with our overarching mission, Safeway plans to operate the .GROCERY gTLD with the aim of serving as a trusted, hierarchical, and intuitive namespace provided by Safeway and its qualified subsidiaries and affiliates for consumers. Safeway will operate .GROCERY as a closed registry. In doing so, we can ensure that all operations within the gTLD will be conducted in line with a strict code of conduct that includes prohibitions against:
GAC Advice Response Form for Applicants

- Counterfeiting, piracy, and other forms of intellectual property theft;
- Phishing or other forms of online fraud;
- The distribution of malware or operation of botnets; and
- The provision of incomplete or inaccurate WHOIS information.

In doing so, Safeway aims to create a safe online space for consumers, free from many of the risks associated with conducting business online.

The Governmental Advisory Committee’s Beijing Communiqué advises that “for strings representing generic terms, exclusive registry access should serve a public interest goal.” In association with this recommendation, the Governmental Advisory Committee (GAC) identifies .GROCERY as a generic string seeking exclusive registry access.

We hope this quells any concerns that the Board might have associated with the .GROCERY gTLD. We invite further dialogue with the Board if it has any remaining concerns regarding Safeway’s .GROCERY application.