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>Coupons.com Incorporated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application ID</td>
<td>1-1668-71698</td>
</tr>
<tr>
<td>Applied for TLD (string)</td>
<td>.COUPONS</td>
</tr>
</tbody>
</table>

Response:
Coupons.com Incorporated would like to affirm to the ICANN Board our commitment to operating the .COUPONS gTLD in a manner that reflects our longstanding history of corporate responsibility.

At Coupons.com Incorporated, we are the leader in digital coupons, including online printable, social, mobile and loyalty card promotions, and we focus on transforming the multi-billion dollar coupon industry and ushering it into the digital world. Over the past 13 years, we have established strong connections with both product manufacturers and consumers, and we have gained the trust of our customers by consistently delivering safe and valuable digital coupons and offers over the Internet.

In line with our overarching mission, Coupons.com Incorporated plans to operate the .COUPONS gTLD “with the intention of bringing to market a trusted, hierarchical, and intuitive namespace for consumers to access content related to coupons worldwide.” Coupons.com Incorporated will operate .COUPONS 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:

- 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, Coupons.com Incorporated 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 a non-exhaustive list of generic strings seeking exclusive registry access.
While Coupons.com Incorporated’s .COUPONS application was not explicitly named, we hope this addresses any concerns that the Board might have now or in the future in connection with the .COUPONS gTLD. We invite further dialogue with the Board if it has any concerns regarding Coupons.com Incorporated’s .COUPONS application.