

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 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:

Applicant Name	Travelers TLD, LLC
Application ID	1-1895-33687
Applied for TLD (string)	.travelersinsurance

Response:

Introduction

Travelers TLD, LLC ("Travelers TLD"), the new gTLD applicant for the .travelersinsurance string, writes to address the Safeguard Advice that was issued by the Governmental Advisory Committee (GAC) on April 11, 2013 against .travelersinsurance. See Beijing GAC Communiqué, Annex 1 at 8-9 ("Beijing Communiqué"). Travelers previously responded to a GAC Early Warning issued by the Australian Government for the .travelersinsurance string with a letter dated February 17, 2013, and responded to the Beijing Communiqué in letters dated May, 2, 2013 (all such letters to be sent to ICANN under separate cover for ICANN's reference) ("GAC Letters"). As described in these letters, and below, Travelers TLD believes that the .travelersinsurance string is branded and specific to its parent company's insurance offerings and services and is not a generic term, thus, the string should not have been included on the list of financial strings requiring certain consumer protection safeguards. Our hope is that this letter will (1) clarify the nature and purpose of the .travelersinsurance TLD; (2) reveal the distinct differences between .travelersinsurance and the other new gTLD strings listed under Category 1 of the Annex to the Beijing Communiqué; (3) convince the ICANN Board that .travelersinsurance was placed on the Category 1 list in error; and (4) cause the Board to conclude that the additional safeguards now being recommended by the GAC for .travelersinsurance are unwarranted.

GAC Safeguard Advice for .Travelersinsurance

The Beijing Communiqué states that "strings that are linked to regulated or professional sectors ... are likely to invoke a level of implied trust from consumers, and carry higher levels of risk associated with consumer harm." Beijing Communiqué at 8. For these reasons, the GAC recommends that the ICANN Board apply a number of safeguards to .travelersinsurance, as the string relates to consumer protection, sensitive strings and/or a regulated market sector.

.Travelersinsurance Does Not Belong on the List

The Travelers Indemnity Company ("Travelers"), the parent company of Travelers TLD, is an insurance company and, through its affiliated Travelers companies, has global operations and a long history dating back to 1864. With more than 30,000 employees, Travelers is a leading provider of property casualty insurance for auto, home and business in the United States and selected international markets, including North and South America, Europe and Asia. Travelers serves millions of customers, meeting insurance needs in more than 90 countries throughout its network of insurers. A component of the Dow Jones Industrial Average (symbol: TRV), the company generated revenues of approximately \$26 billion in 2012. See Travelers website at <http://www.travelers.com>.

As discussed in the GAC Letters, it is critical to clarify that the .travelersinsurance string refers to a specific brand name in which Travelers has well established trademark rights. Specifically, Travelers has registrations world-wide in the "Travelers" and "Travelers"-formative marks relating to the insurance and financial goods and services it provides. By way of example, "Travelers" is a registered mark in the United States, Canada, Switzerland, the European Union, Singapore, Vietnam, and Bolivia. In addition, registrations for formative marks that include the term "Travelers" can be found in Australia, the United States, Switzerland, the United Kingdom, the European Union, China, India, Japan and Brazil. An example of Travelers' registered composite mark - e.g., the word "Travelers" along with the Umbrella design is shown in numerous websites around the world, including but not limited to, at www.travelers.com; www.travelerscanada.ca; www.travelers.co.uk; www.travelers.ie; and www.travelers.com.sg.

The use of the word Travelers in "Travelers insurance" is (as mentioned above) a trademarked brand of an insurance company (i.e., Travelers) that provides a broad range of insurance products and services. As described in the GAC Letters, it is also critical to clarify that "Travelers insurance" is not a generic term, nor should it be equated to travel insurance (i.e., the common generic string for a broad market sector of "insurance of travel," "insurance for travelers," or "insurance for people traveling"). Rather, it is a famous brand (i.e., Travelers) plus a generic term (insurance) that describes the industry in which the brand operates as a famous mark. A perusal of the financial strings listed under Category 1 of the Beijing Communiqué reveals purely generic terms, such as .insurance, .insure, .lifeinsurance, .carinsurance, .bank, .financial, .finance, .fund, .loans and .market. Similarly, all the other strings listed in the various subcategories of the Category 1 list (and even Category 2) are also purely generic terms. The .travelersinsurance string, on the other hand, is the only string on the list comprised of a combination of a generic term for the products Travelers provides (i.e., insurance products) and its well-established trademark rights to the "Travelers" brand in the insurance market. Stated another way, it is unlike any of other strings listed in Category 1 of the Beijing Communiqué, and is thus misplaced in this category.

It is unwarranted and inconsistent to single out .travelersinsurance as the only .brand-related string to make the list of new gTLD strings requiring additional safeguards. Moreover, the lone fact that the .travelersinsurance string "includes" a generic term (i.e., "insurance") that relates to a regulated market sector should not be sufficient to warrant its inclusion on the list. If it were, then all strings meeting that criteria would need to be added to the Category 1 list, such as, .hdfcbank, .lplfinancial, .softbank, and guardianmedia -- all of which would surely qualify as "financial" or "intellectual property" strings and also require implementation of these additional safeguards. The .travelersinsurance string is no different from these strings, in that they all are

GAC Advice Response Form for Applicants



.brand-related strings for closed or restricted TLDs, and all are comprised of the combination of a generic term and a brand specific name.

Furthermore, keeping the .travelersinsurance string on this list could suggest to the new gTLD community that there is a specific concern about this .brand-related application that does not exist with other similar .brand-related applications. Such an impression, even if mistaken, could disadvantage Travelers and its .travelersinsurance application to its detriment, as compared to other brand-insurance, brand-bank, brand-finance, or any other brand-generic string. In addition, this inconsistency creates uncertainty for other .brand-industry related strings regarding whether ICANN will decide to impose additional safeguards on them at a later date. While Travelers TLD respects and shares the GAC's concerns over strings, such as those relating to the insurance sector, that invoke a level of implied trust from consumers and thus carry higher levels of risk associated with consumer harm, Travelers maintains that it should not be held to a more stringent standard than similarly situated new gTLD applicants for other .brand-related strings. For all of these reasons, Travelers encourages and requests that the ICANN Board find that the GAC safeguard advice issued against .travelersinsurance was either made in error or is unwarranted.

GAC Discussions

Travelers TLD has articulated the concerns recited herein with several GAC members, including Peter Nettlefold, Suzanne Radell, and Heather Dryden, and has received an initial indication from some members that there may be inconsistencies in the list, especially as it relates to this string. Travelers TLD believes that ICANN and the GAC have a vested interest in treating similar applications in a similar and consistent way, yet this cannot be the case if .travelersinsurance remains on the GAC list.

Furthermore, including .travelersinsurance on the list creates a significant issue of inconsistency and ambiguity regarding how to interpret and implement the Beijing Communiqué. Accordingly, Travelers TLD encourages and requests that ICANN ask the GAC to clarify how it arrived at such a decision so that ICANN and all gTLD applicants with "brand-generic" strings will know with certainty how to interpret and implement the Beijing Communiqué. Clear and consistent implementation of the Beijing Communiqué is essential to having a robust and non-arbitrary system for protecting the public and preserving competition in the DNS space.

Travelers' Commitment

Finally, Travelers TLD respects the concerns of the GAC regarding new gTLDs. Travelers is generally supportive of the application of the six safeguards that the GAC has advised should apply to all new gTLDs. Beijing Communiqué at 7. These six safeguards should help to mitigate abuse and consumer harm and preserve the public's confidence and trust in the Domain Name System and the Internet in general. Further, while Travelers TLD believes that .travelersinsurance should be removed from Category 1, it remains fully committed to operating this registry in a manner that complies with ICANN's mandate of fostering competition, diversity, security and stability in the DNS space, while also making strides to enhance and expand the Travelers brand.

We sincerely appreciate the opportunity to provide the ICANN Board with this response to the Beijing Communiqué and hope our comments have been helpful and will lead to the removal of

GAC Advice Response Form for Applicants



.travelersinsurance from the GAC's list. We would be happy to provide you with any other information needed on the above issues and concerns.

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February 17, 2013

VIA EMAIL to Peter.Nettlefold@dbcde.gov.au
Mr. Peter Nettlefold
Department of Broadband, Communications and the Digital Economy
Manager – Internet Governance, IPND and Numbering Team
GPO Box 2154 Canberra ACT 2601

RE: Australia Early Warning on .TRAVELERSINSURANCE
Application ID: 1-1895-33687

Dear Mr. Nettlefold:

On behalf of our client Travelers TLD, LLC (“Travelers TLD”), we write to address the Early Warning concerning .travelersinsurance issued by the Australian Government on November 20, 2012. We appreciate the opportunity to respond to the issue raised therein and hope that the information we now provide will clarify the nature and purpose of the .travelersinsurance TLD. Further, we hope that our explanation of the issue raised by the Australian Government will reassure it of the propriety of the TLD and forestall further objection to Travelers TLD’s proposed registry.

The Australian Early Warning

The Australian GAC Early Warning stated as follows, identifying its primary concerns as potential competition issues arising out of operating .travelersinsurance as a “closed generic”:

The proposed string, .travelersinsurance, is a common generic term relating to a market sector. Travelers TLD, LLC is proposing to exclude any other entities, including potential competitors, from using the TLD. Restricting common generic strings for the exclusive use of a single entity could have unintended consequences, including a negative impact on competition.

As possible remediation steps, Australia recommended that Travelers TLD “specify criteria for third party access to the TLD.” Further, said criteria “should be appropriate for the types of risk associated with the TLD, and . . . not set anti-competitive or discriminatory conditions” Australia also recommended that the criteria adopted form part of any binding contract entered into with ICANN and be subject to oversight by ICANN.

Travelers’ Response

The Travelers Indemnity Company (“Travelers”), the parent company of Travelers TLD, is an insurance company and, through its affiliated Travelers companies, has global operations and a long history, dating back to 1864. With more than 30,000 employees, Travelers is a leading provider of property casualty insurance for auto, home and business in the United States and selected international markets, including North and South America, Europe and Asia. Moreover, Travelers is able to meet insurance needs in more than 90 countries worldwide through its network of insurers. A component of the Dow Jones Industrial Average (symbol: TRV), the company generated revenues of approximately \$26 billion in 2012. (See Travelers website at www.travelers.com and global screen shots shown in Exhibit A hereto).

Travelers agrees that delegating purely generic strings that refer to highly regulated industries for the exclusive use of a single entity (for example, .insurance) could raise anti-competitive concerns, and potentially undermine the purpose and goals of the new gTLD program itself, *i.e.*, to encourage diversity, promote competition, and enhance the utility of the DNS system. In fact, Travelers has actively supported the efforts of the American Insurance Association (AIA) to draw ICANN’s and the GAC’s attention to the problems inherent in the generic insurance-related strings, such as .insurance, .insure, .carinsurance, and .autoinsurance, including through public comments and outreach efforts. However, Travelers believes that the concern with purely generic strings, and the related concern expressed by the Australian GAC in its Early Warning – *i.e.*, operating .travelersinsurance as a “closed generic” – it simply inapplicable to the proposed Travelers TLD for the following reasons.

First, it is critical to clarify that the “.travelersinsurance” string refers to a specific brand name in which Travelers TLD’s parent company, Travelers, has well established trademark rights. In particular, Travelers has registrations world-wide in the “Travelers” and “Travelers”-formative marks relating to the insurance and financial goods and services we provide. By way of example, “Travelers” is a registered mark in the United States, Canada, Switzerland, the European Union, Singapore, Vietnam, and Bolivia. Moreover, registrations for formative marks that include the term “Travelers” can be found in Australia,¹ the United States, Switzerland, the United Kingdom, the European Union, China, India, Japan, and Brazil. An example of Travelers’ registered composite mark in Australia is shown below:

¹ In Australia, it has a registration for Travelers and its Umbrella design, reg. no.1228350. In addition, it has registrations for Travelers Institute, reg. no. 1323924 in classes 35, 36 and 41, and Travelers Championship, reg. no. 1186986 in Class 41.



Therefore, this application does not represent an attempt to restrict access to a broader market sector through a generic string. Travelers' operation of the TLD will not preclude any other insurance company from utilizing their own brand names in a TLD string. Other insurance companies were able to apply for new gTLD strings that contain their brand name plus the generic "insurance" term, and would be able to do so in any future TLD application rounds. To be clear, nothing about the .travelersinsurance string closes out any other insurance company from applying for its own TLD and/or from providing insurance services on the Internet, and thus the TLD does not present competition issues.

Furthermore, because the TLD is comprised of the combination of a generic term for the products Travelers provides (i.e., insurance services) and its well-established trademark rights to the "Travelers" brand in that market, the TLD in no way narrows or closes the market to competitors, and instead serves to better guide consumers to Travelers' offerings, thus fulfilling the ICANN goal of less confusion for Internet users.

Finally, the common generic string for the broad market sector of "insurance for travel", "insurance for travelers", and "insurance for people traveling" is commonly referred to as "travel insurance." Exhibit B shows internet search results using www.google.com for these three strings, all of which show "travel insurance" is the common industry term (i.e., generic string) for this broad market sector. In addition, searches using Google-Australia and Google-UK produce the same results, as also shown in Exhibit B. Conversely, the use of the word Travelers in "Travelers insurance," is (as mentioned above) a trademarked brand of an insurance company (i.e., Travelers) that provides a broad range of insurance products and services.

For all of these reasons, Travelers hopes that Australia and other GAC nations will conclude that remediation is unnecessary and that formal advice is unwarranted.

Travelers' Commitment

Travelers TLD respects the concerns of the Australian Government, and appreciates this opportunity to clarify, and it hopes, assuage any concerns Australia has. As set forth above, Travelers TLD believes that the .travelersinsurance string is simply not anti-competitive or generic, but rather, is branded and specific to Travelers' products in a way that will be beneficial to consumers.

Travelers TLD is committed to operating this registry in a manner that complies with ICANN's mandate of fostering competition, diversity, and security, while also making strides to enhance and expand the Travelers brand. In this endeavor, Travelers TLD wants to ensure that your concerns are fully and appropriately addressed and looks forward to your reply. Moreover, we are happy to make members of the Travelers TLD team available for further discussion of this

Letter to Mr. Peter Nettlefold

February 17, 2013

Page 4

issue through whichever medium you prefer including, email, telephone, in-person meetings, and/or video conference.

We sincerely appreciate the opportunity to provide you with these and any other requested clarifications in advance of the issuance of GAC Advice.

Sincerely yours,

A handwritten signature in black ink that reads "Brian J. Winterfeldt". The signature is written in a cursive style with a large initial 'B' and a distinct 'J'.

Brian J. Winterfeldt

cc: Gerald L. DePardo, Travelers

Enclosures:

Exhibit A – Sample of Travelers global website screen shots

Exhibit B – Internet search results

Exhibit A

Sample screen shots from Travelers global businesses

www.travelers.com

The screenshot shows the Travelers Insurance website homepage. At the top left is the Travelers logo, a red umbrella with the word "TRAVELERS" in black. To the right of the logo are navigation links: "Home", "For Agents/Brokers", "For Investors", "Careers", and "Español". There is a "LOG IN" button with a lock icon and a search bar. Below the navigation is a dark horizontal bar with menu items: "For Individuals", "For Business", "Claim Center", "Contact Us", and "About Travelers". The main content area features a large banner with the text "Welcome to Travelers" and "Insurance for your auto, home and business" next to a red umbrella. Below the banner are two columns: "For Individuals" with a photo of a couple and "For Business" with a photo of three people. To the right is a "Get a Quote" form with a dropdown menu set to "Auto", a "ZIP Code" field, and a red "START A QUOTE" button. Below the form are buttons for "Find an Agent" and "Log In". Further down, there are three sections: "Insurance for Individuals" with a list of links (Auto, Homeowners, Renters, Condo, Flood, Umbrella, Wedding & Private Events, Identity Fraud Protection, Valuable Items Coverage); "Insurance for Business" with a list of links (Small, Mid-Sized, Large, International, Specialized Businesses, Surety Bonds, Management & Professional Liability, Risk Control); and "To Report a Claim" with the phone number 800.252.4633 and a photo of a woman on a headset. At the bottom right is a "CLAIM ASSISTANCE LINE" box with the text "Reported your claim, but need additional assistance? We can help" and a "Feedback" button. The browser's address bar shows "Travelers Insurance | Auto Insurance | C..." and the status bar shows "Unknown Zone (Mixed)" and "125%".

Travelers in Canada
www.travelerscanada.ca

The screenshot shows the Travelers Canada website homepage. At the top left is the Travelers logo, and at the top right are navigation links: Contact Us | For Brokers | New Home Warranty | Careers | Travelers.com | Français. A 'FIND A BROKER >' button is located in the top right corner. Below the logo is a red navigation bar with the following menu items: INDUSTRY EXPERTISE, INSURANCE PRODUCTS, CLAIMS CENTRE, RISK CONTROL SERVICE, and ABOUT US. The main content area features a large image of a man in a light blue shirt working on a laptop in a warehouse setting. Overlaid on the image is the text 'Insurance for your business' and the tagline 'MINIMIZE RISK. PREVENT LOSS. PREPARE FOR THE UNKNOWN.' Below the main image is a horizontal row of four service categories, each with an icon and a right-pointing arrow: 'Property & Casualty' (with a building icon), 'Management & Professional Liability' (with a briefcase icon), 'Surety Bonds' (with a padlock icon), and 'Join our Team' (with a red umbrella icon). The browser's address bar at the bottom shows 'Done' and 'Internet', and the zoom level is set to 125%.

Travelers in the UK
www.travelers.co.uk

Travelers UK - Business Insurance

Company History | Contact Us

TRAVELERS

About Us | Risk Control/Management | Claims | Careers | Financial Strength

Insurance for Business

Tailored for you, your business and your bottom line

TRAVELERS INSURANCE PRODUCTS

A wide range of property, liability and other insurance covers for the private, public and institutional sectors...

TRAVELERS SYNDICATE (5000) MANAGEMENT

Specialist covers for particularly large, complex or unusual risks, provided through our Lloyd's of London operation...

INTERNATIONAL

IRELAND

US

ASIA

CANADA

SOLICITORS' PROFESSIONAL INDEMNITY

Extensive experience and expertise in protecting law firms from the risk of

RISK CONTROL/MANAGEMENT

Expert, hands-on guidance to help organisations head off problems

Done Internet 125%

Travelers Syndicate 5000 international relationships through Lloyd's of London

<http://www.travelers.co.uk/iwcm/UKSyndicates/BusinessLines/GlobalProperty/index.html>

The screenshot shows a web browser window displaying the Travelers Global Property page. The browser's address bar shows the URL: <http://www.travelers.co.uk/iwcm/UKSyndicates/BusinessLines/GlobalProperty/index.html>. The page header includes the Travelers logo, the text "Travelers Syndicate Management Ltd.", and the date "February 17, 2013". The navigation menu includes "Home", "Business Lines", "About Us", "Literature", and "Links". The "Business Lines" menu is expanded, showing "Accident & Special Risks", "Aviation", "Global Property", "Marine", and "Power & Utilities". The main content area is titled "Global Property" and features a photograph of a construction worker in an orange safety vest and white hard hat. The text describes the Global Property Unit as a recognized market leader for property business written on primary, full-value or excess-of-loss bases. It states that business is accepted either on a direct basis or as a facultative reinsurance. The page lists key benefits and features, including worldwide commercial/industrial property coverage, property and package binding authorities, property lineslips, and a capacity up to US\$15m any one risk. It also lists reasons to choose Travelers, such as their extensive capability to provide broad property coverage, their underwriters' wealth of expertise and experience, and their commitment to providing an efficient service and fostering long-term relationships with brokers and clients.

Global Property | Travelers Insurance UK

Home Business Lines About Us Literature Links E-Mail Printer Friendly

Travelers
Travelers Syndicate Management Ltd.
February 17, 2013

Business Lines

Global Property

Who is it for?
The portfolio ranges from light commercial risks to light industrial risks and have a dedicated Power and Utility team for all power and midstream business. We will consider most occupancies but do not currently write oil and petrochemical risks or underground mines.

Our Global Property Unit is a recognised market leader for property business written on primary, full-value or excess-of-loss bases.

Business is accepted either on a direct basis or as a facultative reinsurance. Coverage can be on a full all risks basis or for specific perils. Wordings can be issued either on a market standard wording or on a manuscript form, tailored to the client's specific requirements.

Key benefits and features

- Worldwide commercial/industrial property – primary, full value and excess of loss
- Property and package binding authorities
- Property lineslips
- Capacity up to US\$15m any one risk

Why choose Travelers?

- We have an extensive capability to provide broad property coverage for a wide spectrum of commercial risks using the global reach of Lloyd's licences.
- Our underwriters' wealth of expertise and experience enables the Global Property Unit to provide flexible solutions tailored to our clients' risk exposures.
- We are highly committed to providing an efficient service.
- We foster long-term relationships with brokers and clients, securing the associated benefits for each party.

Travelers Syndicate 5000 international relationships through Lloyd's of London

<http://www.lloyds.com/lloyds/offices/asia/china/underwriting-divisions/travelers>

The screenshot shows a web browser window displaying the Lloyd's website. The page title is "Travelers - Lloyd's". The main navigation bar includes "ABOUT US", "THE MARKET", and "NEWS AND INSIGHT". A search bar is located in the top right corner. The breadcrumb trail is "ABOUT US > Global Offices > Asia > China > Travelers". The left sidebar contains a list of underwriting divisions: Ace Tempest Re, Catlin, CV Starr, Navigators, Sportscover, Travelers (highlighted), and Non-Represented Divisions. The main content area features the heading "TRAVELERS" and a sub-heading "TRAVELERS UNDERWRITING DIVISIONS". The text describes the Travelers Underwriting Division as part of Lloyd's China, managed by Travelers Syndicate Management Limited. It provides a brief introduction, direct insurance products, reinsurance products, and contact information for James Miao, Director of Underwriting. The right sidebar lists related topics: Lloyd's Representative Office in Beijing, Lloyd's Insurance Company China Ltd, and China's Insurance Profile. The browser's address bar shows the URL "http://www.lloyds.com/lloyds/offices/asia/china/underwriting-divisions/travelers".

LLOYD'S
THE WORLD'S SPECIALIST INSURANCE MARKET

Search lloyds.com **Search**

ABOUT US Global Offices Asia China Travelers

Ace Tempest Re
Catlin
CV Starr
Navigators
Sportscover
Travelers
Non-Represented Divisions

TRAVELERS

Travelers Underwriting Division is the underwriting division within Lloyd's China specific to Travelers Syndicate 5000 at Lloyd's, managed by Travelers Syndicate Management Limited.

Brief Introduction

Travelers Syndicate Management Limited is part of the Travelers Companies, Inc. – an international property-casualty insurance group with its headquarters in U.S. that traces its origins to 1853, and has annual revenues of around US\$25bn and total assets worth around US\$105bn in 2010.

Travelers Underwriting Division offers brokers and clients flexible, specialist and responsive underwriting to meet their needs and provide reinsurance support throughout China and the region. Also, a tight commercial focus and proven expertise in specialist fields enables Travelers Underwriting Division to provide superior underwriting and support services in selected strategic markets.

Direct Insurance Products

Reinsurance Products

Contact Information

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UNDERWRITING DIVISIONS

- > Ace Tempest Re
- > Catlin
- > CV Starr
- > Navigators
- > Sportscover
- > Non-Represented Divisions

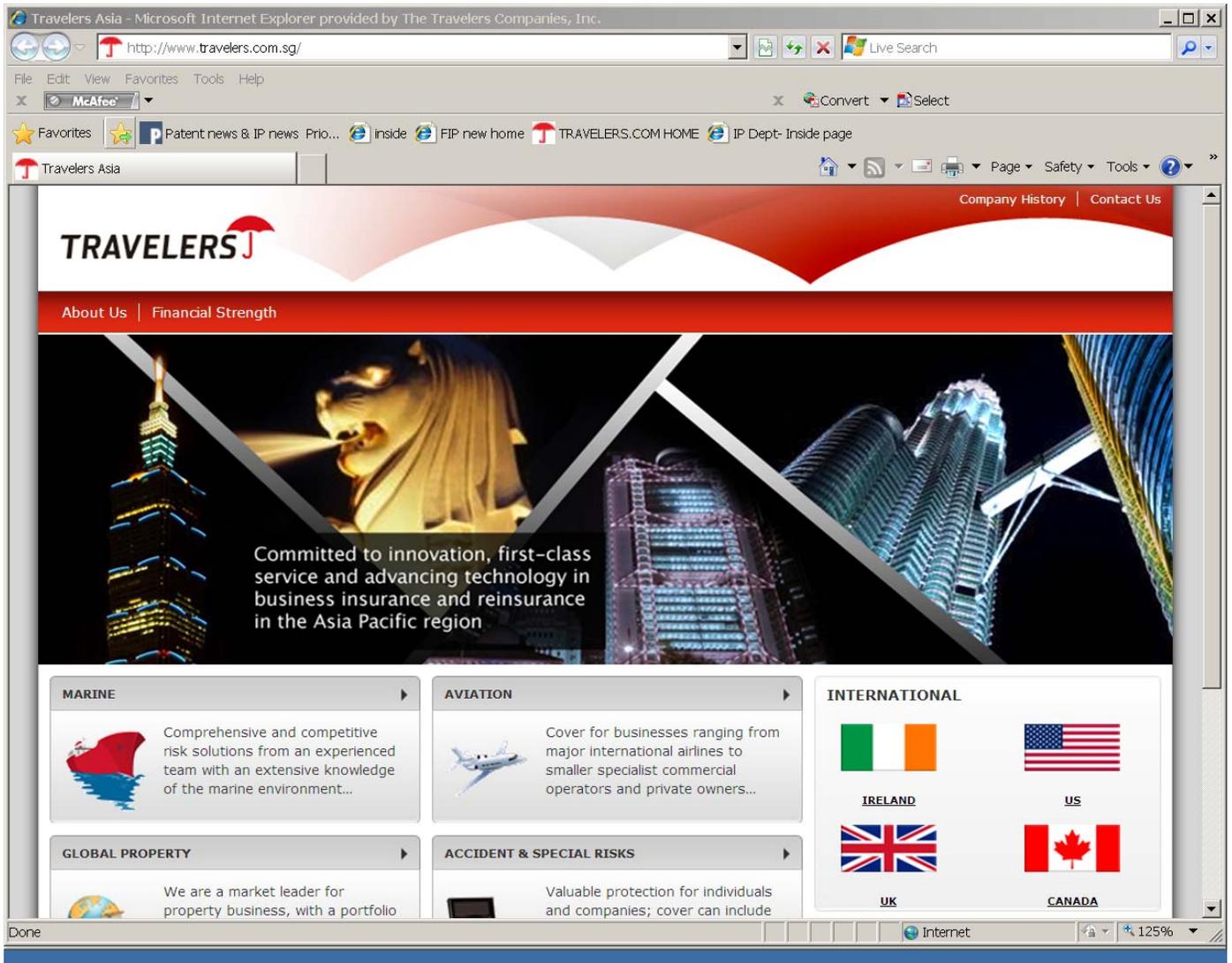
RELATED TOPICS

- > Lloyd's Representative Office in Beijing
- > Lloyd's Insurance Company China Ltd
- > China's Insurance Profile

Internet 125%

Travelers in Singapore

www.travelers.com.sg



Travelers in Ireland

www.travelers.ie

The screenshot shows a web browser window displaying the Travelers Ireland website. The browser's address bar shows "Travelers Ireland - Business Insurance | ...". The website's header features the Travelers logo (a red umbrella) and the word "TRAVELERS" in a bold, sans-serif font. Below the logo is a red navigation bar with links for "Company History" and "Contact Us". A secondary red navigation bar contains links for "About Us", "Broker Services", "Careers", "Claims", "Literature", and "Financial Strength".

The main content area features a large banner image of a person hiking on a rocky cliffside under a cloudy sky. The text "A strong insurance heritage to help ensure a secure future" is overlaid on the left side of the banner.

Below the banner are several content boxes:

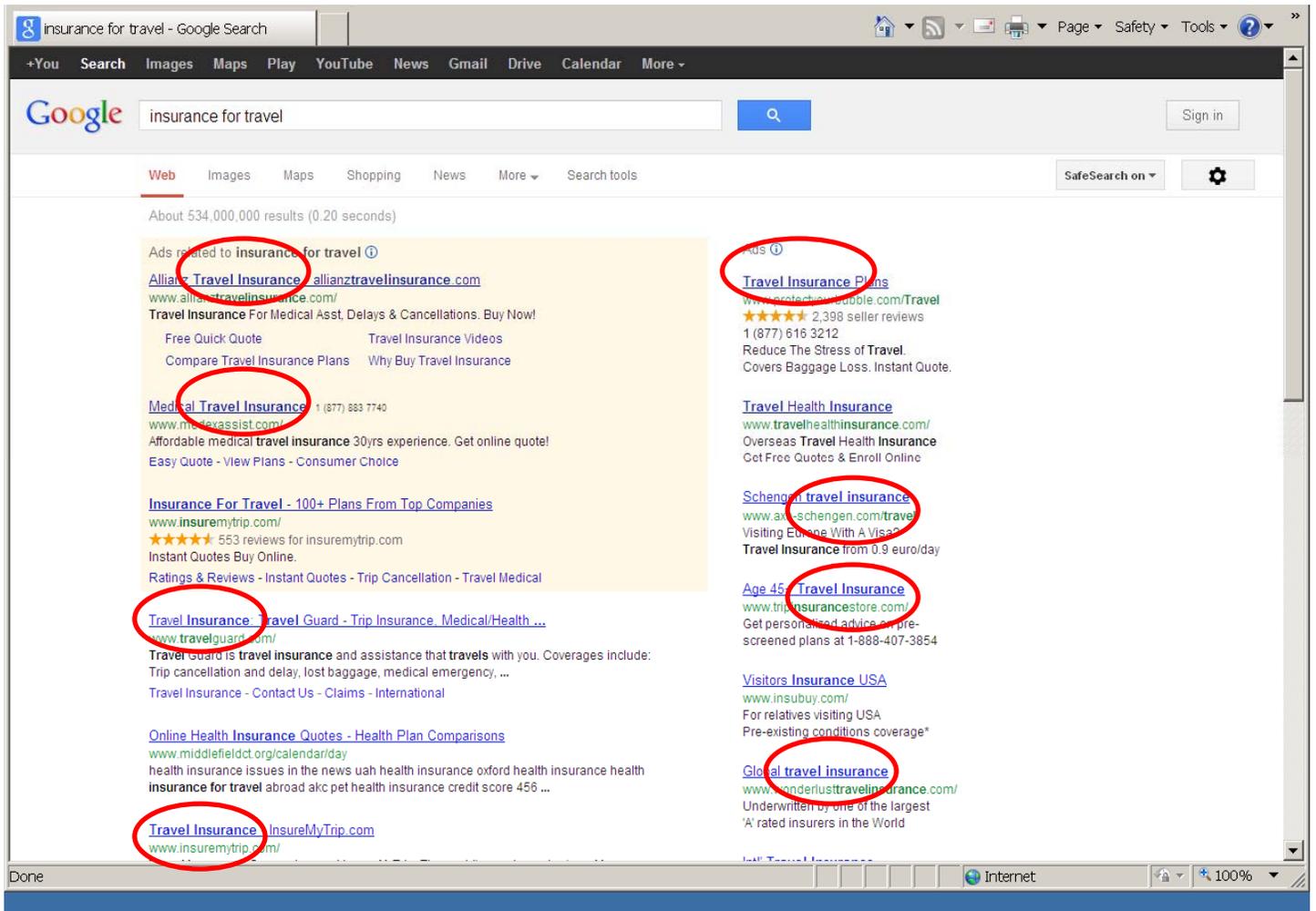
- TRAVELERS INSURANCE PRODUCTS**: Includes an icon of stacked blocks and the text "Better insurance solutions for businesses, private individuals and institutions..."
- FINANCIAL STRENGTH**: Includes an icon of a padlock and the text "The advantage of being part of a leading US insurer established over 150 years ago..."
- INTERNATIONAL**: Features flags for the UK, US, ASIA, and CANADA.
- MAKING A CLAIM**: Includes an icon of a telephone and the text "Information on how to use our swift and efficient claims service..."
- NEWSROOM**: Includes an icon of a newspaper and the text "Travelers breaking news, information and media contacts..."

The browser's status bar at the bottom shows "Done" on the left and "Internet" and "125%" on the right.

Travelers in Brazil
<http://www.jmalucelliseguradora.com.br/>



Exhibit B
www.google.com search
“Insurance for travel”



www.google.com search

“Insurance for Travelers”

The screenshot shows a Google search for "insurance for travelers" on a Windows browser. The search results are displayed in two columns. Several search results are circled in red, highlighting the word "Travel Insurance" in their titles. The results include:

- Insurance For Travelers - Affordable medical travel insurance** (www.medexassist.com/)
- Travel Health Insurance - travelhealthinsurance.com** (www.travelhealthinsurance.com/)
- Better Insurance Coverage - amicacoverage.com** (www.amicacoverage.com/Connecticut)
- Travel Insurance | Travel Guard - Trip Insurance, Medical/Health ...** (www.travelguard.com/)
- Travel Insurance | InsureMyTrip.com** (www.insuremytrip.com/)
- Travel Insurance | Trip Protection & Flight Insurance For Travelers ...** (www.travelersinsurance.com/)
- Allianz Travel Insurance** (www.allianztravelinsurance.com/)
- Intl Travel Insurance** (www.visitorscoverage.com/)
- Travel Visitor Insurance** (www.foreignvisitorinsurance.com/)
- Compare Travel Insurance** (www.insuremytrip.com/)
- AAA Auto Insurance** (www.aaa.com/)
- Visitors Insurance USA** (www.insubuy.com/)
- State Farm® Auto** (www.statefarm.com/)

www.google.com search

“Insurance for people traveling”

The screenshot shows a Google search for "insurance for people traveling". The search bar contains the text "insurance for people traveling" and the search button is visible. Below the search bar, there are navigation tabs for "Web", "Images", "Maps", "Shopping", and "More". The search results are displayed on the left side of the page, with a "Web" tab selected. The results include several ads and organic search results. Several search results are circled in red:

- [Compare Travel Insurance - Customer Ratings & Reviews](#) (www.insuremytrip.com)
- [Allianz Travel Insurance](#) (allianztravelinsurance.com)
- [Travel Guard® Insurance - Instant Travel Insurance Quote](#) (www.travelguard.com)
- [International Travel Insurance for People Traveling Internationally ...](#) (www.travelinsure.com)
- [Travel Insurance for People with Medicare](#) (www.travelinsure.com)
- [Travel Insurance Plans](#) (www.protectyourbubble.com)
- [Affordable Auto Insurance](#) (www.amiacoverage.com)
- [HCC GIG Travel Insurance](#) (www.gig.com)
- [Travel Visitor Insurance](#) (visitorsinsurance.com)
- [Life Insurance - \\$9 Month](#) (www.lifeinsurancequoteshere.com)
- [Global travel insurance](#) (www.ponderlusttravelinsurance.com)

The browser's address bar shows "insurance for people traveling - Google S...". The browser's status bar at the bottom shows "Done" and "Internet".

Google – Australia search (www.google.com.au) “Insurance for travelers”

The screenshot shows a Google search for "insurance for travelers" on the Australian domain. The search results are displayed on the left side of the page, with a list of ads on the right. Several search results and ad titles are circled in red, indicating specific insurance providers.

Search Results (Left Side):

- 1Cover Travel Insurance** - 1cover.com.au
- Cover More Insurance - Travel Insurance** - You Can Trust.
- Travel insurance - Travel Insurance Australia - Allianz Australia**
- Overseas Visitors Health Cover Plans for Australia - Bupa**
- Travel Insurance Australia - Travel Insurance recommended by ...**

Ads (Right Side):

- Virgin Travel Insurance**
- AusPost Travel Insurance**
- Medical Travel Insurance**
- Travel with Amex Platinum**
- Backpacker Insurance**
- Medical Travel Insurance**
- Citibank Travel Insurance**

The browser's address bar shows "insurance for travelers - Google Search". The search bar contains "insurance for travelers". The page is viewed in Internet Explorer, with the status bar at the bottom showing "Done" and "Internet".

Google – UK search (www.google.co.uk)
“Insurance for travelers”

insurance for travelers - Google Search

Come here often? Make Google your homepage.

+You Search Images Maps Play YouTube News Gmail Drive Calendar More

Google insurance for travelers

Web Images Maps Shopping More Search tools SafeSearch on

About 5,540,000 results (0.21 seconds)

Ads related to **insurance for travelers**

Bupa™ Health Insurance - Bupa.co.uk
www.bupa.co.uk/UK_Official_Website
The UK's Award Winning Health Insurer. Get A Quote Online Now.

Best Travel Insurance 0330 818 9323
www.insureandgo.com/Travel_Insurance
★★★★★ 7,515 reviews for insureandgo.com
Cheap single trip **travel insurance**. Award winning annual **travel** cover.
Single Trips from 51p per day - Annual Multi Trips from 10p per day

Travel Medical Insurance - Pre Existing Medical Travel Cover.
www.flexicover.co.uk/MedicalInsurance
Get Fully Covered Today & Save 10%

Travel Insurance - MoneySupermarket
www.moneysupermarket.com/travel-insurance/
Compare **travel insurance** quotes from just £3.50 with moneysupermarket.com, Britain's no1 comparison site. Search over 450 policies and buy your cover ...
Single Trip Travel Insurance - Annual Multi Trip Travel - Travel Insurance Tips

Travel Insurance - Compare The Market
www.comparethemarket.com/travel-insurance/
See how much you could save when you compare **travel insurance** quotes from some of the UK's leading holiday **insurance** providers through ...

Travel Insurance - Compare Cheap Holiday ... - Confused.com
www.confused.com/travel-insurance
Compare cheap **travel insurance** quotes from just £1.19 at Confused.com. Compare quotes from up to 32 holiday **insurance** providers to get the best deal.

Ads

American Express Travel
americanexpress.com/TravelInsurance
Over 150 years' **travel** experience, buy **travel insurance** you can trust

TESCO Travel Insurance
www.tesco.com/Travel_Insurance
15% discount for Clubcard holders who buy online. Get a quote
2,948 people +1'd or follow Tesco

Travel Insurance From £2
www.essentialtravel.co.uk/Insurance
★★★★★ 811 seller reviews
0330 828 2084
Award Winning **Insurance** Provider.
One Week Europe From Only £6.94
506 people +1'd or follow Essential Travel
Email address

Travel Health Insurance
visitorsinsurance.com/Low-CostCoverage
1 (877) 616 1184
Medical **Insurance** For People **traveling** USA or Worldwide. Call Us

Virgin Travel Insurance
www.virginmoney.com/Travel_Insurance
Your Money award winning **Travel**

Internet 100%

Brian J. Winterfeldt
202 429 6260 direct
202 261 7547 fax
bwinterfeldt@steptoe.com

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoe.com

May 2, 2013

VIA ELECTRONIC MAIL (SRadell@ntia.doc.gov)

Suzanne Radell
Senior Policy Advisor
United States Department of Commerce
National Telecommunications and Information Administration, #4701
Office of Internal Affairs
14th and Constitution Ave., NW
Washington, DC 20230

RE: GAC Advice on .TRAVELERSINSURANCE
Application ID: 1-1895-33687

Dear Ms. Radell:

On behalf of our client Travelers TLD, LLC (“Travelers TLD”), we write to express our surprise and disappointment that the .travelersinsurance string has been identified by the Governmental Advisory Committee (“GAC”) as a financial string requiring additional safeguards. *See* Beijing GAC Communiqué (“Beijing Communiqué”), Annex 1 at 9, attached hereto. Although Travelers TLD had previously received a GAC Early Warning from Australia in connection with this string, before the ICANN Beijing meeting, Travelers TLD had a productive conversation with the Australian GAC Representative, Peter Nettlefold, and was optimistic that Mr. Nettlefold understood the purpose and scope of the string and how it relates to Travelers Indemnity Company’s (“Travelers”) global insurance brand. We have contacted Mr. Nettlefold and hope to gain another audience with him to discuss the GAC’s safeguard advice on .travelersinsurance and to obtain his assistance in getting it removed from the list of financial strings falling under Category 1 of the Beijing Communiqué.

Our hope is that the .travelersinsurance string was mistakenly included on the list of Category 1 strings and that its removal will be an easy act. We would greatly appreciate the opportunity to chat with you further about the proposed nature and purpose of the string, to explain the differences between .travelersinsurance and the other strings in Category 1 requiring additional safeguards, and to obtain your support in getting .travelersinsurance removed from the list.

Below, please find our explanation of how .travelersinsurance relates to Travelers TLD’s parent company, Travelers, and is not a generic term. For a more detailed discussion, please see the

Ms. Suzanne Radell

May 2, 2013

Page 2

letter that we wrote to Mr. Nettlefold in response to the Early Warning issued against .travelersinsurance by the Australian Government. *See* Letter to Peter Nettlefold, dated February 17, 2013, attached hereto.

Travelers

Travelers is a leading provider of property casualty insurance for auto, home and business in the United States and selected international markets, including North and South America, Europe and Asia. The “.travelersinsurance” string refers to a specific brand name in which Travelers has well established trademark rights. In particular, Travelers has registrations world-wide in the TRAVELERS and TRAVELERS-formative marks relating to the insurance and financial goods and services Travelers provides. By way of example, TRAVELERS is a registered mark in the United States, Canada, Switzerland, the European Union, Singapore, Vietnam, and Bolivia. Moreover, registrations for formative marks that include the term TRAVELERS can be found in Australia,¹ the United States, Switzerland, the United Kingdom, the European Union, China, India, Japan, and Brazil. An example of Travelers’ registered composite mark in Australia is shown below:



The use of the word Travelers in “Travelers insurance,” is (as mentioned above) a trademarked brand of an insurance company (i.e., Travelers) that provides a broad range of insurance products and services and is not a generic term. In addition, as discussed in our February 17, 2013 letter, “Travelers Insurance” is not a generic term as it is not equivalent to travel insurance. Thus, it is dissimilar to any of the other strings lists under Category 1 of the Beijing Communiqué as all of the other strings are purely generic terms.

Commitment and Request

Travelers TLD believes that the .travelersinsurance string is branded and specific to Travelers’ products and is not a generic term, and thus should be removed from Category 1. That said, Travelers TLD is committed to operating this registry in a manner that complies with ICANN’s mandate of fostering competition, diversity, and security, while also making strides to enhance and expand the Travelers brand.

We would greatly appreciate your support on the matter and the opportunity to speak with you in advance of May 10, 2013, when a response to the GAC’s Safeguard Advice must be submitted to ICANN. We will, of course, make ourselves available at your earliest convenience through

¹ In Australia, it has a registration for TRAVELERS and its Umbrella design, reg. no. 1228350. In addition, it has registrations for TRAVELERS INSTITUTE, reg. no. 1323924 in classes 35, 36 and 41, and TRAVELERS CHAMPIONSHIP, reg. no. 1186986 in Class 41.

Ms. Suzanne Radell
May 2, 2013
Page 3

whichever medium you prefer, including, an in-person meeting, email, telephone, and/or video conference to discuss. Please let us know what date and time may work best for you.

We look forward to working with you in hopes of remedying this matter.

Sincerely yours,

A handwritten signature in black ink that reads "Brian J. Winterfeldt". The signature is written in a cursive, slightly slanted style.

Brian J. Winterfeldt

cc: Gerald L. DePardo, Esq.

Brian J. Winterfeldt
202 429 6260 direct
202 261 7547 fax
bwinterfeldt@steptoe.com

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
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May 2, 2013

VIA ELECTRONIC MAIL (Peter.Nettlefold@dbcde.gov.au)

Mr. Peter Nettlefold
Department of Broadband, Communications and the Digital Economy
Manager – Internet Governance, IPND and Numbering Team
GPO Box 2154 Canberra ACT 2601
Australia

RE: GAC Advice on .TRAVELERSINSURANCE
Application ID: 1-1895-33687

Dear Mr. Nettlefold:

On behalf of our client Travelers TLD, LLC (“Travelers TLD”), we write to express our surprise and disappointment in the issuance of GAC Safeguard Advice against the .travelersinsurance string. In the Beijing GAC Communiqué, .travelersinsurance is listed in Annex 1 under Category 1, as a financial string requiring additional safeguards. *See* Beijing Communiqué at 9, attached hereto. Our hope is that the .travelersinsurance string was listed in error under Category 1 and that the Australian Government will assist Travelers TLD in getting the string removed from the list. As such, we would greatly appreciate the opportunity to chat with you again about the proposed nature and purpose of the string, to explain the differences between .travelersinsurance and the other strings in Category 1 requiring additional safeguards, and to obtain your advice on how best to proceed in removing the GAC Advice issued against this string. Below, please find our explanation of how .travelersinsurance relates to Travelers TLD’s parent company, the Travelers Indemnity Company (“Travelers”), and is not a generic term, as discussed in more detail in our letter to you dated February 17, 2013, attached hereto, and how the string differs from other strings listed in the above-referenced section of the Beijing GAC Communiqué.

Travelers

Travelers is a leading provider of property casualty insurance for auto, home and business in the United States and selected international markets, including North and South America, Europe and Asia. The “.travelersinsurance” string refers to a specific brand name in which Travelers has well established trademark rights. In particular, Travelers has registrations world-wide in the

Mr. Peter Nettlefold

May 2, 2013

Page 2

TRAVELERS and TRAVELERS-formative marks relating to the insurance and financial goods and services Travelers provides. By way of example, TRAVELERS is a registered mark in the United States, Canada, Switzerland, the European Union, Singapore, Vietnam, and Bolivia. Moreover, registrations for formative marks that include the term TRAVELERS can be found in Australia,¹ the United States, Switzerland, the United Kingdom, the European Union, China, India, Japan, and Brazil. An example of Travelers' registered composite mark in Australia is shown below:



The use of the word Travelers in "Travelers insurance," is (as mentioned above) a trademarked brand of an insurance company (i.e., Travelers) that provides a broad range of insurance products and services and is not a generic term. In addition, as discussed in our February 17, 2013 letter, "Travelers insurance" is not a generic term as it is not equivalent to travel insurance. Thus, it is dissimilar to any other string listed under Category 1 of the Beijing GAC Communiqué as all of the other strings listed are purely generic terms.

Commitment and Request

As previously stated, Travelers TLD believes that the .travelersinsurance string is branded and specific to Travelers' products and is not a generic term, and thus should be removed from Category 1. That said, Travelers TLD is committed to operating this registry in a manner that complies with ICANN's mandate of fostering competition, diversity, and security, while also making strides to enhance and expand the Travelers brand.

We would like to speak with you as soon as possible, and preferably before May 10, the deadline for new gTLD applicants to submit a response to GAC Advice. We will make ourselves available at your earliest convenience through whichever medium you prefer, including, email, telephone, and/or video conference. Please let us know what date and time may work best for you.

We look forward to working with you in hopes of remedying this matter.

Sincerely yours,

A handwritten signature in black ink that reads "Brian J. Winterfeldt".

Brian J. Winterfeldt

cc: Gerald L. DePardo, Esq.

¹ In Australia, Travelers has a registration for TRAVELERS and its Umbrella design, reg. no. 1228350. In addition, it has registrations for TRAVELERS INSTITUTE, reg. no. 1323924 in classes 35, 36 and 41, and TRAVELERS CHAMPIONSHIP, reg. no. 1186986 in Class 41.