

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	National Association of Real Estate Investment Trusts, Inc.
Application ID	1-1760-71167
Applied for TLD (string)	REIT

Response:

The National Association of Real Estate Investment Trusts, Inc. (“NAREIT”) writes to address the Governmental Advisory Committee (“GAC”) safeguard advice issued on April 11, 2013 with respect to the .REIT new gTLD string. Specifically, the .REIT new gTLD string was identified by the GAC as being linked to the financial sector and “likely to invoke a level of implied trust from consumers, and carry higher levels of risk associated with consumer harm.” Thus, it “should operate in a way that is consistent with applicable laws.”

We are grateful to receive this important input from the GAC and we fully appreciate that safeguard advice relates to new gTLD strings themselves rather than to the content of any individual new gTLD application. Thus, while we feel that several aspects of the safeguard advice require greater clarity and guidance (including implementation and enforcement of these safeguards in particular, as well as the necessity and applicability of Public Interest Specifications) we also fully agree with the GAC that the .REIT new gTLD string must be protected—this has always been our singular goal in applying to operate it.

Indeed, the content of our application for the .REIT new gTLD string already addresses nearly all applicable safeguards, including safeguards prescribed for all new gTLDs, as well as the safeguards for consumer protection, sensitive strings, and regulated markets. Perhaps the best examples are contained in our response to Question 20, which endorses NAREIT as a trusted representative for the worldwide REIT community and also outlines stringent registration policies to verify and validate genuine members of the REIT community pursuant to clear and regulated entry requirements. In addition, our responses to Questions 26, 28 and 29 squarely address WHOIS verification and registration abuse prohibition, study and reporting mechanisms already in line with the safeguards prescribed by the GAC.

Accordingly, we encourage both the GAC and the ICANN Board of Directors to review our application in light of this safeguard advice. We also pledge to work with the GAC and relevant

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regulatory bodies to assuage any safeguard concerns that are not already addressed in our application.