

GAC Advice Response Form for Applicants



The Government 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	dotCareer LLC
Applicant ID	1-907-61259
Applied for TLD (string)	.CAREER

Response:

On behalf of dotCareer LLC, the new gTLD applicant for .CAREER (Applicant Number 1-907-61259), we are pleased to provide our response to the GAC advice received by the ICANN Board specific to the “six safeguards that should apply to all new gTLD’s”:

GAC Advice, WHOIS verification and checks: Registry Operators will conduct checks on a statistically significant basis to identify registrations in its gTLD with deliberately false, inaccurate, or incomplete WHOIS data at least twice per year. Registry operators will weight the sample towards registrars with the highest percentages of deliberately false, inaccurate or incomplete records in the previous checks. Registry operators will notify the relevant registrar of any inaccurate or incomplete records identified during the checks, triggering the registrar’s obligation to solicit accurate and complete information from the registrant.

Our Response: We agree in principle.

GAC Advice, Mitigating abusive activity: Registry operators will ensure that terms of use for registrants include prohibitions against the distribution of malware, operation of botnets, phishing, piracy, trademark or copyright

GAC Advice Response Form for Applicants



infringement, fraudulent or deceptive practices, counterfeiting or otherwise engaging in activity contrary to applicable law.

Our Response: We agree.

GAC Advice, Security checks: While respecting privacy and confidentiality, Registry operators will periodically conduct a technical analysis to assess whether domains in its gTLD are being used to perpetrate security threats, such as pharming, phishing, malware, and botnets. If Registry operator identifies security risks that pose an actual risk of harm, Registry operator will notify the relevant registrar and, if the registrar does not take immediate action, suspend the domain name until the matter is resolved.

Our Response: We agree in principle.

GAC Advice, Documentation: Registry operators will maintain statistical reports that provide the number of inaccurate WHOIS records or security threats identified and actions taken as a result of its periodic WHOIS and security checks. Registry operators will maintain these reports for the agreed contracted period and provide them to ICANN upon request in connection with contractual obligations.

Our Response: We agree in principle.

GAC Advice, Making and Handling Complaints: Registry operators will ensure that there is a mechanism for making complaints to the registry operator that the WHOIS information is inaccurate or that the domain name registration is being used to facilitate or promote malware, operation of botnets, phishing, piracy, trademark or copyright infringement, fraudulent or deceptive practices, counterfeiting or otherwise engaging in activity contrary to applicable law.

Our Response: We agree.

GAC Advice, Consequences: Consistent with applicable law and any related procedures, registry operators shall ensure that there are real and immediate consequences for the demonstrated provision of false WHOIS information and

GAC Advice Response Form for Applicants



violations of the requirement that the domain name should not be used in breach of applicable law; these conditions should include suspension of the domain name.

Our Response: We agree.

ICANN may also use this response in any final summary, analysis, reporting, or decision-making that takes place as part of its public comment process originated by the New gTLD Board Committee located at <http://www.icann.org/en/news/public-comment/gac-safeguard-advice-23apr13-en.htm>