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Ms. Heather Dryden, President
Government Advisory Council of ICANN
e-mail: gacsec@icann.org

Geneva, 12 August 2012

Re: Request for GAC Early Warning to ICANN on Top Level Domain Name Proposals for “.health”

Dear Ms. Dryden,

It has come to our attention that in the context of the new gTLD programme, four applications have been submitted to ICANN for the top level domain (TLD) “.health”. We recognize the great value to the health marketplace that, collectively, these names could create.

However, at the Health On the Net Foundation (HON), an international NGO, we are concerned about the possibility that ICANN could assign these TLDs without adequate assurances that they will be operated in the interest of global public health.

HON is dedicated to the promotion of transparent and trustworthy health information on the Internet. To achieve this goal, HON offers tools free of charge to the growing online community of healthcare consumers and information providers. One of these tools is the HONcode certification, a proactive way to promote trustworthy health-related websites, which represents 8'000+ health websites in 102 countries. The HONcode certification is a standardized certification verifiable in real time, and it was well established by reaching a consensus among webmasters, citizens and medical experts. HON collaborates with several recognized organizations such as the European Union, the International Organization for Standardization (ISO), the French National Authority for Health (HAS), the Medical Council Research in South Africa, and the Federal Office of Public Health of Switzerland to achieve HON's vision of providing to people in all countries access to health information which is honest and unbiased, or biases being clearly exposed.

Recent articles show that the Internet domain type can affect the perception of trust of the user of the website, a dot edu is perceived more trustworthy than a dot com [1]. In the survey on health and medical internet use of the question “Should only medical, evidence-based websites be allowed to use a .health domain name?” 81% of the respondents responded “yes” or “maybe”, 12 % “no” and 7% had “no opinion” [2]. “Would a domain name dedicated to health (such as .health) help you

identify and more easily search health/medical websites?" 75% responded "yes" or "maybe"; 18% "no", and 7% "no opinion".

The .health is perceived as a controlled environment even if people will not use only the .health domain type of websites while searching for health information online. On the Web the wheat is mixed with the chaff, so the .health will be more perceived as a place where only trusted sources can be. If the .health is open to any websites with no criteria, rogue online pharmacy websites, or fraudulent websites or websites with intentionally false content will be mixed with trusted websites. For this reason it is important that the .health will be limited to authentic health websites upon validation process and respecting a set of criteria managed by communities.

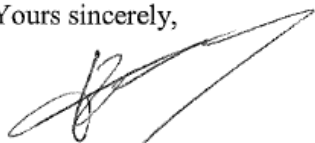
For the reasons above mentioned, we consider it of the greatest importance that “.health” is created as a trusted place for health information and health care practice. The public should be able to rely that the operators of “.health” TLD are trusted entities which operate these TLDs in the interest of global public health, and are capable of ensuring that the attribution of any sub domain meets certain base line conditions which protect public health. For example, the illegal promotion and sale of medicines on the Internet (which pose a serious risk to patients) should be banned. Likewise, preserving the confidentiality of patient information, and enforcing consumer protection during the collection, storage, use and exchange of data online should be assured. These are just examples of the many issues that require careful consideration.

The health Internet is a vital means of health information access worldwide, and trusted and reliable “.health” top level domain based on the public interest and broad-based, multi-stakeholder consensus principles would be a critical resource for the global community. We understand that the current applicants intend to sell the “.health” TLD on a ‘first-come, first-served’, wholesale and auction basis, placing private interests ahead of the public interest.

We urge the GAC to consider the lack of the public health dimension in the current “.health” TLD proposals as a serious reason for making the applications for “.health” TLD the subject of an Early Warning and subsequently to GAC Advice to the ICANN Board.

Thank you very much for your consideration.

Yours sincerely,



Célia Boyer Edith
Executive Director
Health On the Net Foundation



Litscher-Graf, Swiss National Councilor
President
Health On the Net Foundation

References:

- [1] Bernhardt JM, Felter EM, Online Pediatric Information Seeking Among Mothers of Young Children: Results From a Qualitative Study Using Focus Groups; J Med Internet Res 2004;6(1):e7;URL: <http://www.jmir.org/2004/1/e5/>
- [2] Pletneva N, Cruchet S, Simonet MA, Kajiwarra M, Boyer C. [Results of the 10 HON survey on health and medical internet use](http://www.hon.ch/Survey/analysis.html). Stud Health Technol Inform. 2011;169:73-7. <http://www.hon.ch/Survey/analysis.html>