



Verbindung der Schweizer Ärztinnen und Ärzte  
Fédération des médecins suisses  
Federazione dei medici svizzeri  
Swiss Medical Association

Ms Heather Dryden, President Gov-  
ernment Advisory Council of ICANN  
e-mail: [gacsec@icann.org](mailto:gacsec@icann.org)

Ref: Hanspeter Kuhn

Bern, 29 August 2012

**Request for GAC Early Warning to ICANN on Top Level Domain Name Proposals for  
«.health'», «.med», «.medical» and «.doctor»**

Dear Ms Dryden,

The Swiss Medical Association FMH represents the physicians of Switzerland.

It has come to our attention that, in the context of the new gTLD program, several applications have been submitted to ICANN for the top level domain (TLD) «.health», «.med», «.medical» and «.doctor».

As health professionals, we are concerned about the possibility that ICANN could assign these TLDs without any adequate assurances that they will be operated in the interest of global public health.

We consider it of the greatest importance that «.health», «.med», «.medical» and «.doctor» are created as trusted places for health information as well as for health care practice and practitioners. The public should be able to rely on the operators of these TLD to be trusted entities which operate these TLDs in the interest of global public health, and to be capable of ensuring that the attribution of any subdomain meets certain baseline conditions which protect public health. Among other things, the illegal promotion and sale of medicines on the Internet should of course 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 Internet is a vital means of health information access worldwide; hence, trusted and reliable top level domains such as «.health», «.med», «.medical» and «.doctor», based on the public interest and on multi-stakeholder consensus principles, would be a critical resource for the global community.

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We understand that the current applicants intend to sell these TLD on a «first-come, first-served», that means, on a wholesale and auction basis, they are placing private interests ahead of the public interest. Therefore, we urge the GAC to take into account the lack of consideration to the public health dimension in these current TLD proposals as a serious reason for making the applications for these TLD the subject of an Early Warning and subsequently to GAC advice to the ICANN Board.

Thank you very much for your consideration.

Sincerely yours,

**FMH**

A handwritten signature in black ink, appearing to read 'Dr. de Haller', with a stylized flourish at the end.

Dr Jacques de Haller, MD  
President