

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

27 July 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 community that, collectively, these names could create.

However, as an NGO working in the field of research and development for neglected diseases which affect millions of people in developing countries, 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.

We do consider it of the greatest importance that “.health” be created as a trusted place for health information and health care practice. The public should be able to rely that the operators of “.health” are trusted entities which operate these TLDs in the public interest, 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-serve’, wholesale and auction basis, placing private interests ahead of the public good.

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,



Dr Bernard Pécoul  
Executive Director  
Drugs for Neglected Diseases *initiative*