



Latin American Telecom LLC  
4 Gateway Center 9th Floor  
Pittsburgh, Pa. 15222  
1(702) 856 6292  
[rami@mexico.com](mailto:rami@mexico.com)  
[www.TUBEgTLD.com](http://www.TUBEgTLD.com)

September 4, 2013

To : The Governmental Advisory Committee

Ms. Heather Dryden, Chair  
Mr. Peter Nettlefold, Vice Chair  
Mr. Thomas Schneider, Vice Chair  
Mr. Tracy Hackshaw, Vice Chair

Governmental Advisory Committee - ICANN

RE: Protection of .TUBE as a Sensitive Generic String

Dear Members of the Governmental Advisory Committee:

Latin American Telecom ("LAT") appreciates the opportunity to address the Governmental Advisory Committee ("GAC") and ICANN on a matter of utmost importance to the New gTLD program (the "Program"), and the overall future of the Internet -- protecting the public interest and maintaining open platforms for the distribution of online information in video format.

As a new applicant in string contention for .TUBE, LAT has closely followed the GAC advice on sensitive strings. This discussion is important and must continue to be addressed with great care. It has come to our attention that NTAG is considering a petition to GAC, among other things, to finalize the list of Sensitive Strings ("Category 2 List") and is working to address questions about exemptions and waivers to the Code of Conduct.

Accordingly, we respectfully request that before moving to the next phase of its advice on Category 2, GAC add .TUBE to the Category 2 List.

**1) .TUBE as a Sensitive String**

Preserving open access to "generic strings," in this case, specifically protecting a string that represents a platform for dissemination of information in video format is of critical importance.

***.TUBE is an extremely important string that should remain open and be used to serve the public interest. It cannot be used as a closed, exclusive registry to monopolize and forever prevent any public use of the word.<sup>1</sup>***

As you may not be fully aware, the string identifies a platform for online video distribution. Like the word “TUNES,” which is recognized as a colloquial or slang word for music or songs (and is included in the list of sensitive strings), “TUBE” is known on the Internet to refer to a platform to disseminate “online video.” “TUBE” is also analogous to “VIDEO,” which is also included in Category 2 List.

Moreover, the two most searched terms of all generic strings applied for in the new gTLD program are “BOOK” with more than 3 billion searches per month, and “TUBE” with more than 1.3 billion searches per month. (attached as Exhibit A is a copy of a report identifying the number of searches for all generic strings in the gTLD program). “Tube” is by far one of the most searched terms of all those applied for in this first round of gTLD expansion. For example, “Tube” has 4 times more searches than “Hotel” and 11 times more searches than “blog”, both of which are in the Category 2 List of Sensitive Strings. See Id. Thus, the important public use of the word is apparent, and in the context of the new gTLD program warrants protection.<sup>2</sup>

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<sup>1</sup> Dictionary Definition of “Tube” <http://www.thefreedictionary.com/tube>; See also the uses of “Tube” in various trades and also as a slang [http://www.tubegtld.com/tube\\_definitions](http://www.tubegtld.com/tube_definitions); See also a non-exhaustive list of more than 100 websites from companies that have incorporated the word TUBE into their URL’s, and use the term in connection with their trade in various industries, such as health care, electronics and entertainment among others <http://www.tubegtld.com/industry-related>; and a list of almost 200 websites that have incorporated the word TUBE into their URL’s and are currently using the term to distribute online video and compete against YouTube <http://www.tubegtld.com/interactive-video-sites>.

<sup>2</sup> According to Google AdSense results, of all the strings in Category 2, only VIDEO had more searches than “Tube” during 2012 (See links below to compare search traffic of terms protected Category 2 Strings compared to “Tube”). In all examples below, with exception of the first comparison, “Tube” leads in the number of monthly searches.

<http://www.google.com/trends/explore#q=tunes%2C%20tube%2C%20video%2C%20music%2C%20movie&date=1%2F2012%2012m&cmpt=q> (tunes, video, music, movie, tube)  
<http://www.google.com/trends/explore#q=antivirus%2C%20app%2C%20autoinsurance%2C%20baby%2C%20tube&date=1%2F2012%2012m&cmpt=q> (antivirus, app, autoinsurance, baby, tube)  
<http://www.google.com/trends/explore#q=beauty%2C%20blog%2C%20book%2C%20broker%2C%20tube&date=1%2F2012%2012m&cmpt=q> (beauty, blog, book, broker, tube)  
<http://www.google.com/trends/explore#q=carinsurance%2C%20cars%2C%20cloud%2C%20courses%2C%20tube&date=1%2F2012%2012m&cmpt=q> (carinsurance, cars, cloud, courses, tube)  
<http://www.google.com/trends/explore#q=cpa%2C%20cruise%2C%20data%2C%20dvr%2C%20tube&date=1%2F2012%2012m&cmpt=q> (cpa, cruise, data, dvr, tube)  
<http://www.google.com/trends/explore#q=financialaid%2C%20flowers%2C%20food%2C%20game%2C%20tube&date=1%2F2012%2012m&cmpt=q> (financialaid, flowers, food, game, tube)  
<http://www.google.com/trends/explore#q=grocery%2C%20hair%2C%20hotel%2C%20hotels%2C%20tube&date=1%2F2012%2012m&cmpt=q> (grocery, hair, hotel, hotels, tube)  
<http://www.google.com/trends/explore#q=insurance%2C%20jewelry%2C%20mail%2C%20makeup%2C%20tube&date=1%2F2012%2012m&cmpt=q> (insurance, jewelry, mail, makeup, tube)  
<http://www.google.com/trends/explore#q=map%2C%20mobile%2C%20motorcycles%2C%20news%2C%20tube&date=1%2F2012%2012m&cmpt=q> (map, mobile, motorcycles, news, tube)

While the “non-exhaustive” list should be “finalized” to avoid any additional delays to the gTLD Program, LAT is privy to information that necessitates further review of this string, and, ultimately the inclusion of .TUBE in the enumerated list of sensitive strings.

As you are aware, GAC has identified the following non-exhaustive list of strings that it considers to be generic terms, where the applicant is currently proposing to run exclusive, closed registries:

.antivirus, .app, .autoinsurance, .baby, .beauty, .blog, .book, .broker, .carinsurance, .cars, .cloud, .courses, .cpa, .cruise, .data, .dvr, .financialaid, .flowers, .food, .game, .grocery, .hair, .hotel, .hotels, .insurance, .jewelry, .mail, .makeup, .map, .mobile, .motorcycles, .movie, .music, .news, .phone, .salon, .search, .shop, .show, .skin, .song, .store, .tennis, .theater, .theatre, .tires, .tunes, .video, .watches, .weather, .yachts, .クラウド [cloud], .ストア [store], .セール [sale], .ファッション [fashion], .家電 [consumer electronics], .手表 [watches], .書籍 [book], .珠宝 [jewelry], .通販 [online shopping], .食品 [food]”

**.TUBE, aptly fits in right before .TUNES and .VIDEO, not only alphabetically, but in context and meaning. “TUBE” is a word that shares a colloquial or slang meaning (as “tunes” relates to music or songs), and as a word that is analogous to video.**

Moreover, as set forth below, allowing one party to run .TUBE as a closed exclusive registry has the potential to prevent the public from utilizing “Tube” to disseminate video information online or otherwise. It also has the potential to award an applicant a virtual “trademark” and, in the case of Google, to create a monopolistic brand around what has been found to be a generic word.<sup>3</sup>

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<http://www.google.com/trends/explore#q=phone%2C%20salon%2C%20search%2C%20shop%2C%20tube&date=1%2F2012%2012m&cmpt=q> (phone, salon, search, shop, tube)

<http://www.google.com/trends/explore#q=show%2C%20skin%2C%20song%2C%20store%2C%20tube&date=1%2F2012%2012m&cmpt=q> (show, skin, song, store, tube)

<http://www.google.com/trends/explore#q=tennis%2C%20theater%2C%20theatre%2C%20tires%2C%20tube&date=1%2F2012%2012m&cmpt=q> (tennis, theatre, theater, tires, tube)

<http://www.google.com/trends/explore#q=watches%2C%20weather%2C%20yacht%2C%20tube&date=1%2F2012%2012m&cmpt=q> (watches, weather, yacht, tube)

<sup>3</sup> See e.g. Latin American Telecom, LLC v. Charleston Road Registry, Inc., 2013-0055 (Jul. 29, 2013) (acknowledging that Applicant (Google) *intends to use the term in a generic sense*, and not to acquire intellectual property rights in the gTLD).

<http://www.wipo.int/export/sites/www/amc/en/domains/lro/docs/lro2013-0055.pdf>. Indeed, the decision appears to turn on the “fact” that Applicant made a powerful argument in favor of “Tube” as a purely

2) **.TUBE - Two Open Applications and One Request to Run Closed Registry.**

LAT is one of three (3) applicants in the contention set for .TUBE. Of the three applicants, only Charleston Road Registry (“Google”) is seeking an **exception from ICANN to run .TUBE as a closed registry** (and, in essence, create a new brand for Google’s exclusive use to be paired with its .YOUTUBE platform). Conversely, LAT and Donuts, Inc. have applied to run .TUBE as **open** registries for the public use.

Because the issue is central to LAT’s business interests, LAT has closely examined the competing applications, and explored Google’s business plans for the string. LAT determined that Google has submitted identical applications for both .YOUTUBE and .TUBE.<sup>4</sup> The only distinction between the two Applications is the name of the applied for “string.” Both applications aim to extend the YouTube “brand,” via the new gTLD program, and both seek exemptions from the standard registry operator Code of Conduct to allow for a “closed generic”/“single registrant gTLD” in which Google will be the only permissible registrant. While a closed, exclusive registry *is appropriate* for YOUTUBE, the identical application and request is wholly inappropriate for TUBE, a term associated by the public with television and video, as well as other uses, for which Google has no trademark rights.

We agree with GAC that it is against the public interest to limit registration of a generic string exclusively to a single person or entity and their affiliates. The PIC Specifications included a provision to preclude registry operators from imposing eligibility criteria that limit registration of a generic string exclusively to a single person or entity and their “affiliates.” While LAT and Donuts submitted PICS to reinforce their commitment to operating .TUBE in a manner that recognizes and respects public interest, Google did not make such a commitment. The conspicuous absence of Google’s PIC is further evidence of Google’s unwillingness to operate TUBE in accordance with the public interest.

Google’s TUBE application seeks to impose eligibility criteria that would grant **exclusive registry access** to one affiliate -- Google, and will not operate in a

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generic word. It should be noted that LAT filed a Legal Rights Objection against Google, in part, because of Google’s application to run a closed, exclusive registry for .TUBE (LAT did not file an LRO against Donuts because it applied to run an open registry). LAT is also on record as a strong opponent of closed generic registries, unjustified waivers to the code of conduct, and is as a supporter of open registries for generic terms in the public interest. LAT’s prior comments submitted can be viewed at <http://forum.icann.org/lists/comments-closed-generic-05feb13/pdfNuKYvT3rLR.pdf>.

<sup>4</sup> Compare YOUTUBE Application ID 1-1417-80062 <https://gtdresult.icann.org/application-result/applicationstatus/applicationdetails/813> with TUBE Application ID 1-1417-80062 <https://gtdresult.icann.org/application-result/applicationstatus/applicationdetails/1310>

transparent manner consistent with general principles of openness and non-discrimination.

Google's TUBE Application violates the **public interest**, and is seeks an exemption to operate .TUBE as a closed new brand or to in sole support of .YOUTUBE, providing in pertinent part that:

- Because **the sole purpose of the proposed gTLD is to associate domain names with the YouTube product**, Charleston Road Registry intends to apply for an exemption to the ICANN Registry Operator Code of Conduct and **operate the gTLD with Google as the sole registrar and registrant**. Application ID 1-1417-80062 at Q18.b.iv. Registration Policies.
- Members of the public **will not** be able to directly register domain names in this new gTLD... Id. at 18.c.i. Minimizing Social Costs and Other Negative Consequences.
- **Select content distributors will, however, be given the opportunity to make use of a vanity second-level domains** as a memorable identifier linked to content in .youtube. **Content distributors will be assigned a vanity domain name pursuant to Google's forthcoming user registration guidelines.** Id. at 18.c.i. Minimizing Social Costs and Other Negative Consequences.
- Charleston Road Registry believes that given its specific use related to YouTube, the .tube gTLD will best add value to the gTLD space by limiting all second-level domains to solely pointing at select content distributors' YouTube offerings. **Google, as the sole registrant, will manage the second-level domain eligibility and allocation process. Only select content distributors who meet YouTube's eligibility criteria will be eligible for a second-level domain within the gTLD.** Application ID 1-1417-80062 at 18.b.iv. Registration Policies.

Google's Application makes it abundantly clear that that, if .TUBE is not protected and kept as an open, sensitive gTLD, YouTube's dominance in online video distribution will extend beyond .YOUTUBE and include .TUBE. If the generic "TUBE" is closed off to the public, it will irreparably impair innovation and stifle (indeed, eliminate) competition and public access to the string. A unified closed combined platform of .YOUTUBE and .TUBE controlled by Google may have far reaching anti-trust consequences as well.

Allowing a single-registrant waiver for Google in a gTLD for which it holds no trademark rights would not only sanction anticompetitive use, but also be at odds with ICANN's promise of greater innovation and public access. Allowing this type of single registrant usage in furtherance of an existing business model (one that

already dominates the online video platform world – YouTube) would deny the opportunity for innovative businesses to be established as they could be if .TUBE were an open, multi-registrant domain. Such a proprietary use of a dictionary word, in which the Applicant holds no trademark rights, is contrary to the aims of the new gTLD program and in violation of the “public interest” standard applicable to granting such waiver requests. The new gTLD program was created with a mechanism to protect trademark rights, not become a means by which they are surreptitiously acquired.

An open .TUBE would allow for this innovative public use of the term, by companies and individuals that have been in different businesses involving the word “tube” for decades. It would also allow the public, as it should, to choose whether or not it wanted to use the YouTube platform or another system (whether existing or to be created). Without an open string, individuals and businesses would be harmed. Tube, like Tunes and Video, should remain open and provide the public with the option to purchase domain names and have access to the string.

### 3) **Google’s Advocacy for TUBE as a Generic Word.**

Despite LAT’s registered United States Trademark for TUBE, LAT applied to run an “open” registry. In March, 2013, LAT filed a Legal Rights Objection (the “LRO”) against Google, in part, because of Google’s application to run a closed, exclusive registry for .TUBE (LAT did not file an LRO against Donuts because it applied to run an open registry).

Google’s Response to the LRO<sup>5</sup> provided extensive argument, on the “genericness” of the word TUBE. Below are some of the many arguments in favor of the generic nature of the word:

- **“TUBE” is a commonly used generic word that means, among other things, “television” or “online video content.”**
- Moreover, because **TUBE is a generic term**, Objector has no broadly enforceable rights in TUBE for domain name services.
- **TUBE is a commonly used word for television or digital video content.** Although Objector may own a trademark registration for TUBE, **Objector** is entitled to only a limited scope of protection and **cannot prevent others from using TUBE as a generic term.**

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<sup>5</sup> Google’s Response to the LRO can be viewed here: <http://www.tubegtld.com/libraries/uploaded/general/file/procedure/LRO-Objection-Response-TUBE-CaseNo-LRO2013-005.pdf>. Their additional written submission can be viewed here: <http://www.tubegtld.com/libraries/uploaded/general/file/procedure/TUBE-Legal-Rights-Objection-Additional-Written-Submission-CaseNo-LRO2013-0055.pdf>

- **if a term is being generically used to identify a type of product or a service, in this case “video online,” then it is in the public domain and free for all to use.**
- **Here, TUBE is widely used in the marketplace and by third parties. Because TUBE is a generic term...**
- **such rights must be very limited in scope so as not to affect the public’s ability to use TUBE as a generic term.**
- **Clearly, whatever rights Objector has in its TUBE mark are extremely limited in scope and is not sufficient to prevent a good-faith application for a gTLD comprised of a generic term.**
- **The primary significance of TUBE is a generic term meaning “television” or “online video content”**
- **Indeed, as is indicated by its name, the new generic top level domain name program was intended to create broader consumer choice for generic terms as top level domains. In line with those goals, Applicant applied for the gTLD of the common everyday generic term TUBE so that select consumers can register domain names that signal to Internet users that websites at TUBE domain names will host video content related in one way or another to the website owner.**
- **Moreover, TUBE is a generic term that is commonly used in the marketplace. Therefore, Internet users are accustomed to viewing different uses of TUBE and not associating such uses with a single source, and certainly do not associate all uses of TUBE with objector. Generic use of a term is a complete defense against all of the harms alleged by Objector.**
- **Such a generic addition to the DNS was one of the primary goals of the new gTLD program—to increase consumer choice.**
- **TUBE is a common everyday generic term commonly used in the marketplace. TUBE is often used in the marketplace by numerous third parties.**
- **“Tube” is a Generic Word With Respect to Online Audiovisual Broadcasting Services**
- **if a term is being generically used to identify a type of product or a service, in this case “video online,” then it is in the public domain and free for all to use.**

The WIPO panelist agreed with Google's statements above, and denied the LRO. Taking Google's own statements, and public understanding and perception into account, it is clear that TUBE has an important "generic" purpose, should be "free for all to use," and it should not be a closed string. These points are consistent with LATs Application (and Donuts) to run an open registry. Moreover, given the substantial effect on commerce, and the public's ability to use a platform for online dissemination of video content, the string must not be closed to public registrations. Per Google's own words, TUBE is generic. Therefore, it should remain an open registry, and certainly not for the exclusive promotion and enhancement of YOUTUBE or to create yet another, closed brand for Google's exclusive use.

#### 4) **A Closed .TUBE Will Create Public Harm and is Anti-Competitive**

A single registrant .TUBE controlled by Google would not be a platform for competition and innovation by registrants, but rather a means by which Google can extend and consolidate its dominance of online video distribution.

While the major focus of gTLD protection has been against "cybersquatting" and "brand protection" the New gTLD Program has missed a **greater risk** to the public interest by, unintentionally, allowing companies like Google and Amazon to "game" the application process and apply to run closed registries for "generic words" for which they do not own trademark rights.

Such closed registries will create irreparable material harm to the public and allow Google and Amazon (Amazon has applied to run closed registries for .song .tunes. and .music) to further consolidate their massive power with in verticals for online video and music. **Allowing "closed generics" is generally improper, but even more so in the case where a party seeks to use a "generic" to control an entire marketplace and media distribution platform.**

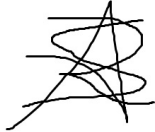
As Google's Application plainly states, "registrations will be granted based on Google business needs." Such a proprietary use of, in Google's own words, a "dictionary word," in which the applicant holds no trademark rights is contrary to the aims of the new gTLD program and in violation of the "public interest" standard applicable to granting such waiver requests.

It is unclear how ICANN will handle request for exemptions from the Code of Conduct. Therefore, it is important to address this issue and open debate on this topic today. It is clear that rationale against permitting "closed generics," applies to this string as well. Given Google's, stated desire to close TUBE and only allow "selected" parties (that use YouTube) to have .TUBE domains, the string should be included in the protected list of generic terms in "Category 2." We understand and respect that this process is constantly evolving and appreciate the opportunity to present the issue for consideration and evaluation.



Thank you for your attention to this important matter. Should you require additional information, we remain available to discuss this matter at your convenience. In the meantime, we look forward to the inclusion of the term TUBE in the Category 2 list of Sensitive Strings.

Very truly yours,

A handwritten signature in black ink, appearing to be 'Rami Schwartz', written over a horizontal line.

Rami Schwartz  
Jason Schaeffer  
*On behalf of Latin American Telecom, LLC*

Enclosure

## Exhibit A

Word	Competition	Global Monthly Searches	Local Monthly Searches (US)
book	Low	3,760,000,000	414,000,000
tube	Low	1,380,000,000	151,000,000
online	Low	923,000,000	124,000,000
free	Low	755,000,000	151,000,000
video	Low	755,000,000	101,000,000
game	Low	618,000,000	124,000,000
movie	Low	618,000,000	101,000,000
mail	Low	506,000,000	101,000,000
sex	Low	506,000,000	55,600,000
one	Low	414,000,000	83,100,000
auto	Medium	338,000,000	45,500,000
bank	Low	338,000,000	83,100,000
film	Low	338,000,000	24,900,000
hotel	High	338,000,000	45,500,000
juegos	Low	338,000,000	1,830,000
gratis	Low	277,000,000	3,350,000
home	Low	277,000,000	124,000,000
live	Low	277,000,000	45,500,000
map	Low	277,000,000	83,100,000
news	Low	277,000,000	83,100,000
school	Low	277,000,000	124,000,000
shop	Low	277,000,000	55,600,000
web	Low	277,000,000	45,500,000
world	Low	277,000,000	83,100,000
city	Low	226,000,000	83,100,000
club	Low	226,000,000	55,600,000
hot	Low	226,000,000	37,200,000
music	Low	226,000,000	55,600,000
radio	Low	226,000,000	24,900,000
sport	Low	226,000,000	24,900,000
love	Low	185,000,000	45,500,000
mobile	Low	185,000,000	45,500,000
red	Low	185,000,000	45,500,000
sale	High	185,000,000	83,100,000
art	Low	151,000,000	37,200,000
buy	Medium	151,000,000	55,600,000
cars	Medium	151,000,000	37,200,000
college	Low	151,000,000	68,000,000
drive	Low	151,000,000	30,400,000
forum	Low	151,000,000	16,600,000
life	Low	151,000,000	45,500,000
phone	Medium	151,000,000	45,500,000
play	Low	151,000,000	37,200,000
review	Medium	151,000,000	68,000,000

show	Low	151,000,000	45,500,000
store	Low	151,000,000	55,600,000
baby	Low	124,000,000	37,200,000
blog	Low	124,000,000	20,400,000
box	Medium	124,000,000	30,400,000
cam	Low	124,000,000	13,600,000
chat	Low	124,000,000	11,100,000
football	Low	124,000,000	30,400,000
gay	Low	124,000,000	24,900,000
group	Low	124,000,000	30,400,000
kids	Medium	124,000,000	55,600,000
media	Low	124,000,000	16,600,000
place	Low	124,000,000	24,900,000
website	Low	124,000,000	30,400,000
bar	Low	101,000,000	30,400,000
casa	Low	101,000,000	3,350,000
design	Medium	101,000,000	30,400,000
earth	Low	101,000,000	24,900,000
guide	Low	101,000,000	30,400,000
plus	Medium	101,000,000	16,600,000
property	Medium	101,000,000	45,500,000
restaurant	Low	101,000,000	30,400,000
stream	Low	101,000,000	13,600,000
team	Low	101,000,000	20,400,000
audio	Low	83,100,000	16,600,000
data	Low	83,100,000	20,400,000
direct	Low	83,100,000	13,600,000
doctor	Low	83,100,000	24,900,000
dog	Medium	83,100,000	37,200,000
food	Low	83,100,000	45,500,000
gold	Medium	83,100,000	20,400,000
green	Low	83,100,000	30,400,000
hair	Medium	83,100,000	37,200,000
health	Low	83,100,000	37,200,000
search	Low	83,100,000	37,200,000
app	Low	68,000,000	16,600,000
band	Low	68,000,000	20,400,000
country	Low	68,000,000	30,400,000
express	Low	68,000,000	20,400,000
family	Low	68,000,000	30,400,000
golf	Medium	68,000,000	20,400,000
inc	Low	68,000,000	24,900,000
law	Low	68,000,000	30,400,000
ltd	Low	68,000,000	11,100,000
money	Low	68,000,000	20,400,000
moto	Low	68,000,000	2,240,000
party	Low	68,000,000	24,900,000
pay	Low	68,000,000	30,400,000
photography	Low	68,000,000	20,400,000
pizza	Low	68,000,000	20,400,000

rent	High	68,000,000	30,400,000
run	Low	68,000,000	24,900,000
studio	Low	68,000,000	13,600,000
style	Low	68,000,000	20,400,000
talk	Low	68,000,000	11,100,000
theater	Low	68,000,000	24,900,000
wedding	Medium	68,000,000	30,400,000
cafe	Low	55,600,000	13,600,000
coupon	Medium	55,600,000	37,200,000
energy	Low	55,600,000	20,400,000
fish	Low	55,600,000	20,400,000
global	Low	55,600,000	13,600,000
insurance	Medium	55,600,000	24,900,000
monster	Low	55,600,000	13,600,000
now	Low	55,600,000	13,600,000
security	Medium	55,600,000	20,400,000
shopping	Low	55,600,000	13,600,000
tech	Low	55,600,000	20,400,000
tickets	Medium	55,600,000	20,400,000
africa	Low	45,500,000	6,120,000
apartments	Medium	45,500,000	24,900,000
coupons	Medium	45,500,000	30,400,000
fun	Low	45,500,000	16,600,000
garden	Low	45,500,000	16,600,000
help	Low	45,500,000	20,400,000
science	Low	45,500,000	16,600,000
soccer	Low	45,500,000	13,600,000
spa	Medium	45,500,000	9,140,000
wow	Low	45,500,000	9,140,000
church	Low	37,200,000	24,900,000
click	Low	37,200,000	6,120,000
coach	Low	37,200,000	11,100,000
corp	Low	37,200,000	16,600,000
cricket	Low	37,200,000	3,350,000
fashion	Low	37,200,000	9,140,000
furniture	High	37,200,000	20,400,000
latino	Low	37,200,000	3,350,000
marketing	Medium	37,200,000	7,480,000
mom	Low	37,200,000	11,100,000
pet	Medium	37,200,000	16,600,000
pet	Medium	37,200,000	16,600,000
racing	Low	37,200,000	9,140,000
salon	Low	37,200,000	9,140,000
ski	Medium	37,200,000	7,480,000
basketball	Low	30,400,000	16,600,000
bet	Low	30,400,000	2,240,000
construction	Low	30,400,000	11,100,000
cruise	Medium	30,400,000	11,100,000
deal	Medium	30,400,000	9,140,000
deals	Medium	30,400,000	11,100,000

diet	Medium	30,400,000	13,600,000
gift	High	30,400,000	13,600,000
goo	Low	30,400,000	4,090,000
living	Low	30,400,000	13,600,000
med	Low	30,400,000	5,000,000
save	Low	30,400,000	7,480,000
spot	Low	30,400,000	7,480,000
tennis	Medium	30,400,000	6,120,000
baseball	Low	24,900,000	16,600,000
beauty	Low	24,900,000	7,480,000
discount	Medium	24,900,000	13,600,000
fit	Medium	24,900,000	7,480,000
flowers	Medium	24,900,000	11,100,000
legal	Low	24,900,000	9,140,000
lol	Low	24,900,000	4,090,000
poker	Low	24,900,000	3,350,000
taxi	Medium	24,900,000	3,350,000
wine	Medium	24,900,000	11,100,000
casino	Low	20,400,000	6,120,000
cloud	Low	20,400,000	6,120,000
delivery	Medium	20,400,000	7,480,000
eco	Medium	20,400,000	2,740,000
gmbh	Low	20,400,000	201,000
loans	High	20,400,000	11,100,000
realestate	Medium	20,400,000	11,100,000
trading	Low	20,400,000	5,000,000
vip	Low	20,400,000	1,830,000
yoga	Low	20,400,000	7,480,000
dot	Low	16,600,000	6,120,000
fishing	Medium	16,600,000	7,480,000
gifts	High	16,600,000	9,140,000
hockey	Low	16,600,000	6,120,000
immo	Low	16,600,000	60,500
jewelry	High	16,600,000	9,140,000
realty	Low	16,600,000	9,140,000
rip	Low	16,600,000	3,350,000
rugby	Low	16,600,000	1,220,000
storage	High	16,600,000	9,140,000
tires	High	16,600,000	9,140,000
auction	Medium	13,600,000	6,120,000
boats	Medium	13,600,000	6,120,000
desi	Low	13,600,000	1,500,000
docs	Low	13,600,000	5,000,000
guardian	Low	13,600,000	2,240,000
lawyer	Medium	13,600,000	7,480,000
memorial	Low	13,600,000	7,480,000
sas	Low	13,600,000	2,240,000
broker	Low	11,100,000	3,350,000
dev	Low	11,100,000	1,500,000
diy	Low	11,100,000	4,090,000

expert	Low	11,100,000	1,500,000
hosting	Medium	11,100,000	2,240,000
llc	Low	11,100,000	7,480,000
luxury	High	11,100,000	3,350,000
mba	Medium	11,100,000	1,830,000
ping	Low	11,100,000	2,740,000
srl	Low	11,100,000	135,000
vote	Low	11,100,000	7,480,000
bingo	Low	9,140,000	1,220,000
mls	Low	9,140,000	4,090,000
phd	Low	7,480,000	2,740,000
secure	Low	7,480,000	2,240,000
broadway	Low	6,120,000	4,090,000
grocery	Low	6,120,000	3,350,000
charity	Medium	5,000,000	1,500,000
cpa	Medium	4,090,000	1,830,000
dds	Low	4,090,000	2,740,000
sucks	Low	4,090,000	2,240,000
webs	Low	4,090,000	1,000,000
yun	Low	2,740,000	368,000
llp	Low	2,240,000	1,000,000
merck	Low	1,500,000	301,000
osaka	Low	1,500,000	201,000
sarl	Low	1,500,000	27,100
weibo	Low	1,500,000	201,000
forsale	Medium	550,000	246,000
fyi	Low	368,000	60,500
site	-	-	-

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