

September 14, 2012

ICANN

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To Whom it May Concern:

The Republican State Leadership Committee (“RSLC”) and the Republican National Committee (“RNC”) submit this letter of public comment in opposition to the application by United TLD Holdings Ltd. (“United TLD”) for the .REPUBLICAN top level domain (gTLD). As two of the most recognized Republican Party organizations, the RSLC and the RNC have a legitimate interest in preserving the legitimacy and integrity of the .REPUBLICAN gTLD.

The RSLC is the largest caucus of Republican state leaders and the only national organization formed to elect down-ballot, state-level Republican office-holders. The RSLC has over 100,000 donors from all 50 states supporting the RSLC’s goals to pursue a pro-growth agenda, including reforming the tax code, healthcare and legal systems; promoting a better educational system; encouraging sound energy initiatives; and advocating public safety through tough, crime-fighting policies.

The RSLC includes four caucus groups, all of which support these comments: the Republican Lieutenant Governors Association, the Republican Attorneys General Association, the Republican Secretaries of State Committee, and the Republican Legislative Campaign Committee (“RLCC”).

The RLCC, for example, is the only national organization dedicated exclusively to electing more Republicans to state legislatures. Founded in November 2002, the RLCC focuses on increasing the number of Republican-held state legislative chambers across the country by targeting national resources on key legislative races. The RLCC provides support in the form of direct financial, strategic and tactical assistance, independent expenditures, research, issue development, and training for candidates, staff and grassroots activists.

The RNC is the structural heart of the Republican Party of the United States. It links a confederation of Republican parties in all 50 states, the District of Columbia, Guam, Puerto Rico, American Samoa, the Northern Mariana Islands and the Virgin Islands. It is an organization created and authorized by the Rules adopted at the preceding Republican National Convention. It operates under *The Rules of the Republican Party* until the adoption of new Rules at the next convention. Between conventions, it is the governing body of the Republican Party.

United TLD Holdco Ltd. (“United TLD”), an off-shore Cayman Island based entity, has applied for .REPUBLICAN and for 25 other gTLDs such as .GAY, .BAR, .PUB, .REHAB and .DEMOCRAT. All of United TLD’s applications appear to be speculative purchases based on predictions regarding the applicability and popularity of certain words and phrases, and not based on any product or service produced, or engaged in, by United TLD or any of its related entities. Specifically, United TLD’s application for the .REPUBLICAN and .DEMOCRAT gTLDs is meant as an attempt to commercially capitalize on the two major American political parties, with which it has no affiliation.

United TLD is a subsidiary of Demand Media, a publicly traded company, headquartered in Santa Monica, CA. The company has no political interests, but instead owns and operates a variety of internet properties, some of which have been heavily criticized as “content farms.” These internet sites drive traffic to their pages by misleading internet users with unofficial, mediocre, and sometimes incorrect content. In fact, Google instituted considerable changes to its search algorithm to eliminate questionable search results from some of Demand Media’s websites such as eHow.com.

United TLD’s registration of .REPUBLICAN raises many issues regarding United TLD’s suitability to operate such a gTLD. The .REPUBLICAN gTLD incorrectly gives the impression that the Republican Party and/or Republican-affiliated organizations have bestowed authority on the gTLD to operate. Additionally, while not labeled as a “community-based gTLD”, .REPUBLICAN would provide the impression of a community-based gTLD, as it would appear to serve the needs of the Republican Party (a clearly delineated community of people). Presenting this impression is purposefully misleading, and United TLD should not be provided the opportunity to deceive and confuse the interests of the Republican community. United TLD is not suited to be an owner and operator of the .REPUBLICAN gTLD because it does not represent the interests of the Republican community, nor does it have an ongoing relationship with the Republican community. If United TLD were allowed to operate .REPUBLICAN, it would be provided with the imprimatur of authority to represent the interests of the Republican Party, which is something that the Republican Party strongly opposes.

Furthermore, users may rely on the .REPUBLICAN gTLD for official information regarding the Republican Party, voter registration, elected officials, party news and other information relevant and important to a citizen’s right to vote and engage in the U.S. political system. United TLD is not a reliable source of such information. Indeed, given Demand Media’s history of providing, at times, inaccurate information to its users through its internet properties, such as

eHow.com, United TLD will likely deliver false and misleading information regarding very important political issues. Users will be easily misled by the .REPUBLICAN gTLD since the content and information will not have been reviewed or authorized by the Republican Party or any of its related or authorized entities prior to posting.

The .REPUBLICAN gTLD has the potential to be a very powerful gTLD. Not only would it communicate to the end-user the concepts of political and government authority, but it would convey an association with an official organization promoting the interests, and serving the needs, of a clearly delineated community, serving very specific interest such as preserving voter rights, electing public officials, and promoting other political and legislative matters. United TLD's application for the .REPUBLICAN gTLD should be denied, as the company does not represent the interests of the Republican community and will likely exploit the impressions of authority communicated by the .REPUBLICAN gTLD for commercial and misleading purposes.

In contrast, the RSLC is a fitting entity to operate the .GOP gTLD for which it has applied. The term "GOP" stands for Grand Old Party, which is a widely recognized reference to the Republican Party. As stated in the RSLC's FAQ page devoted to .GOP on its website, the RSLC will use the .GOP domain to 1) ensure that organizations representing the domain, and hence the party, are of the highest caliber, and 2) use any funds generated through such management to elect Republican officeholders across the country. The RSLC will also use the .GOP gTLD to provide authenticity and credibility to websites associated with the Republican Party. These are things that United TLD cannot do and has shown no interest in doing with respect to its proposed .REPUBLICAN gTLD. Thus, permitting United TLD's applied-for .REPUBLICAN gTLD to operate would seriously diminish the effectiveness of the RSLC's legitimate .GOP gTLD.

For the above reasons, we urge ICANN to reject United TLD's application for the .REPUBLICAN gTLD.



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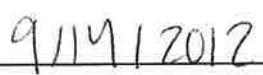
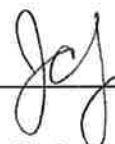
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