



International  
Trademark  
Association

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Via email: [comments-gnso-rpm-pdp-phase-1-final-recommendations-07apr21@icann.org](mailto:comments-gnso-rpm-pdp-phase-1-final-recommendations-07apr21@icann.org)

April 23, 2021

Mr. Maartin Botterman  
Chair  
ICANN Board of Directors  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536

**Re: Rights Protection Mechanisms Recommendations for ICANN Board Consideration**

Dear Mr. Botterman:

INTA is pleased to submit its comments regarding the GNSO Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process Phase 1 Final Recommendations for ICANN Board Consideration (the "RPM Phase 1 Final Report").

INTA supports the recommendations within the RPM Phase 1 Final Report, and strongly encourages the ICANN Board to adopt them. The conclusions in the RPM Phase 1 Report represent the result of an extremely deliberate and fair multi-stakeholder consensus-building process. There were compromises made by all parties involved in the review and INTA respects the outcomes.

Finally, because these recommendations generally represent small modifications to existing policies and documents, a smooth, straight forward implementation process should follow. Therefore, we do not support use of the more formal Operation Design Phase (ODP) to evaluate the cost and feasibility of implementing the recommendations. INTA looks forward to assisting, as needed, in the Phase 1 implementation phase, and to participating in Phase 2 of the RPM Review in due course.

Thank you for your consideration of INTA's comments.

If you have any further questions or concerns regarding this submission, please feel free to contact Lori Schulman, Senior Director, Internet Policy at [lschulman@inta.org](mailto:lschulman@inta.org) or +1(202)704-0408.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Etienne Sanz de Acedo". The signature is stylized and cursive.

Etienne Sanz de Acedo  
Chief Executive Officer

### **About INTA**

INTA is a global not-for-profit association with more than 7,200 member organizations from over 187 countries. One of INTA's goals is the promotion and protection of trademarks as a primary means for consumers to make informed choices regarding the products and services they purchase. During the last two decades, INTA has also been the leading voice of trademark owners within the Internet community, serving as a founding member of the Intellectual Property Constituency of the Internet Corporation for Assigned Names and Numbers (ICANN). INTA's Internet Committee is a group of over 175 trademark owners and professionals from around the world charged with evaluating treaties, laws, regulations and procedures relating to domain name assignment, use of trademarks on the Internet, and unfair competition on the Internet, whose mission is to advance the balanced protection of trademarks on the Internet.