

Karen Day and Robin Gross, Co-chairs
New gTLD Subsequent Procedures Sub-Team – Track 3

The Hague, 19 December 2017
Ref.: GS001490/EP/RvK

Dear Ms Day and Ms Gross,

The International Pharmaceutical Federation (FIP), the global body representing pharmacy and pharmaceutical sciences, is concerned about the potential for public harm in subsequent rounds of new generic Top-Level Domains (gTLDs) if certain precautions are not taken. Namely, new gTLDs that mimic existing verified TLDs in highly regulated sectors but that lack the same safeguards stand to create confusion and place consumers at risk of fraud and abuse. New gTLDs that are exact translations of existing verified TLDs in highly regulated sectors therefore should not be permitted in subsequent rounds. Likewise, synonyms of existing verified TLDs in these sectors should not be permitted in subsequent rounds. The only exception should be if the applicant for the gTLD that is an exact translation or synonym employs the same safeguards as the existing verified gTLD.

Who is FIP? Founded in 1912, FIP comprises 140 national organisations, academic institutional members and individual members and represents over three million pharmacists and pharmaceutical scientists around the world. Its mission is to improve global health by advancing pharmaceutical education, pharmaceutical sciences and pharmaceutical practice thus encouraging, promoting and enabling better discovery, development, access to and responsible use of appropriate, cost-effective, quality medicines worldwide. FIP also serves on the .Pharmacy Executive Board, providing guidance to the National Association of Boards of Pharmacy® (NABP®) in its operation of the .pharmacy verified TLD. The .Pharmacy Executive Board makes recommendations to NABP concerning strategy and standards that serve the interests of the global public health.

What is a verified TLD? A verified TLD, as defined by the Verified Top-Level Domains (vTLD) Consortium, requires:

- Verification of eligibility prior to use, ensuring domain name registrant identity and alignment with registry policies.
- Adherence to standards, requiring that domain name registrants maintain credentials necessary to participate in the vTLD and abide by registration policies.

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- Autonomy to take back a name, giving registry operators the discretion and authority to take back a domain name in the event of any violation of registration policies.
- Ongoing verification, wherein registry operators ensure ongoing vTLD eligibility through reverification or audits.

The scourge of unlawful, fake pharmacies: why verification matters.

Consumers today put their safety at risk when they buy medicine online. NABP has reviewed nearly 11,500 websites selling prescription medicine and has found that 96% of them do so illegally. Many of them have been found to sell unapproved, substandard, and counterfeit medicine. In fact, regulatory and law enforcement officials have indicated that the internet is the most common pipeline for counterfeit medicine entering the supply chain.

NABP's .Pharmacy verified TLD. As the independent, international, and impartial Association that assists its member boards and jurisdictions for the purpose of protecting the public health, NABP has been verifying internet pharmacies since 1999. In 2014, NABP became the registry operator of the .pharmacy TLD – an evolution of its ongoing efforts to create a safe online environment for pharmacy transactions and health product information. With policies and procedures in place to ensure that only legitimate, law-abiding website operators are able to register domain names in .pharmacy, NABP maintains the .pharmacy TLD as a secure and trustworthy destination where consumers worldwide can be sure the medications and related information they obtain online are authentic and safe. Organizations such as Google, Bing, and Visa rely on NABP verification to ensure that their online pharmacy advertisers and merchants are legitimate.

To ensure the .pharmacy TLD operates in a manner consistent with international laws and standards, a global coalition of pharmacy community stakeholders provides guidance on .pharmacy registry operations. In addition, the program establishes partnerships with regulators in each jurisdiction where the .pharmacy domain names are available and maintains the highest program standards through participation in global forums to gather input from international pharmacy community stakeholders.

Risk of confusion. Unless it, too, is operated under the same safeguards as .pharmacy, another gTLD that is an exact translation of the word “pharmacy” (eg, “farmacia”), or a synonym of the word “pharmacy” (eg, “apothecary”) has the potential to create confusion. Consumers who look to the .pharmacy extension as an indicator of safety may trust an exact translation or a synonym of that extension to be similarly verified, even if it is not.

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This situation creates an unnecessary risk for consumers. In the case of gTLDs that represent highly regulated sectors and impact public safety, avoiding such confusion is of utmost importance.

Although the public comment period for these issues has passed, FIP hopes you will consider the concerns and recommendations stated herein in the interest of public safety. Please feel free to reach out to FIP representative Tom Menighan at TMenighan@APHANET.ORG for more information.

Sincerely,

A handwritten signature in blue ink that reads "Ema Paulino". The signature is fluid and cursive, with a large initial "E" and a long, sweeping underline.

Ema Paulino
Interim CEO

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