



International Medical
Informatics Association

81 Boulevard de la Cluse
1205 Geneva
Switzerland

Tel: +41-22-3727249
Skype: imia-office
imia@imia-services.org

At-Large New gTLD Review Group

Via e-mail to newgtldrg@icann.org

January 25, 2013

Request to consider an Objection for the “.health” new gTLDs

Dear Sir or Madam,

This note is to request the ALAC to consider filing an objection for the applications for the “.health” new gTLD, on Community objection grounds. Currently there are five applications for “.health”, four of which are in English and one in Chinese script. These five proposals are seen as problematic by the global health community for the following reasons:

- 1) None of the applicants demonstrates that the name will be operated in the public interest.
- 2) None of the applicants demonstrates adequate consumer protection mechanisms.
- 3) All of the applicants are commercial in nature and none represent the health community.

Basis for Community Opposition to the ‘.health’ TLD applications

In 2012, a number of stakeholders expressed concerns about the creation of the new “.health” gTLD by current applicants and requested that its allocation, in all UN languages, be postponed to allow for the consultation of global health stakeholders. Examples include:

- The governments of France and Mali have issued ‘Early Warnings’ for the five “.health” applications
- A number of NGOs in official relations with the World Health Organization (WHO) have posted Comments on the ICANN Public Forum and written to ICANN and the Government Advisory Committee (GAC)
- WHO has written to ICANN and the GAC
- The European Commission has issued a letter to ICANN, noting ‘.health’ among others, as a sensitive string
(<http://www.icann.org/en/news/correspondence/steneberg-to-icann-board-annexes-27nov12-en>)

The concern of the Community is along the following lines:

- The “.health” TLD should be a trusted resource for health, in particular to counter current international challenges such as fraud, identity theft, illicit sale of pharmaceuticals, security, protection of minors and so on.
- There is no guarantee that the new “.health” TLD will be operated in the interest of global public health and consumer protection.

- The “.health” TLD without the adequate quality assurance and consumer protection mechanisms in place will undermine credibility and harm the growth of the health online market place. An open and unrestricted TLD will help to bypass regulatory controls creating new risks for the whole industry sector.
- Developing countries will suffer the most in this scenario, due to their difficulties in enforcing national policies to regulate, monitor, and stop fraud and misuse.

We have read the conditions for Community Objection grounds, and believe there are sufficient grounds on which to make an objection. We would be pleased to provide further detailed information, based on an analysis of the applications and with the health community, to support the Objection, should you decide to proceed.

Best regards,

A handwritten signature in blue ink, appearing to read "A. Geissbuhler".

Antoine Geissbuhler
President of the International Medical Informatics Association