

5 February, 2013

Mr. Fadi Chehadé, President and CEO  
Dr. Stephen D. Crocker, Chair, ICANN Board  
Mr. Cherine Chalaby, Committee Chair, New gTLD Program  
Mrs. Christine Willett, General Manager, New gTLD Program

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Good People,

The International Federation of Organic Agriculture Movements (IFOAM) is the umbrella organization for the organic sector worldwide. Since 1972, IFOAM has defined, convened, represented, educated, and advocated an organic approach to life on planet Earth for producers, consumers, traders, policy makers, researchers, and communities. We are a membership-based organization with over 750 members and representation from over 115 countries, with a respected standing with governments, and partnerships with intergovernmental agencies such as FAO and UNCTAD, among others. IFOAM's work has been the foundational piece of most organic standards and markets worldwide. Our formal positions on policy and governance, science and technology, and ecological and socioeconomic practices have been and continue to be the formative guidance adopted by the organic sector.

Our organization previously submitted comments about the application to ICANN by Starting Dot for the ownership of the global Top Level Domain (gTLD) .BIO. We hereby rescind those previous comments in light of new information that has come to us about this application based on significant interaction and meetings with Starting Dot. Our position has changed to one of positive support for Starting Dot and its application for the .BIO gTLD. (We would respectfully reiterate that the term "BIO" refers to organic production in ten languages and over fifty countries.)

In response to the concerns we raised against their application, Starting Dot proactively engaged with IFOAM to explain its intentions, approach, and concrete implementation plans for administration, oversight, and control of the .bio gTLD. We have been suitably impressed and moved by their sincerity of purpose, cooperative spirit, and pragmatic approach for making this new gTLD a space that can provide enormous opportunity to the organic sector.

Our concerns about the potential ambiguity of registrants' activities or the messages they might convey through use of a .BIO string have been put to rest by Starting Dot's explanation of its initial registration policy and the related control and public feedback mechanisms they plan to implement upon launch and subsequent management of the .BIO gTLD. In addition, Starting Dot has listened

to our concerns and comments and has thereby improved on its initial registry policy. We feel these policies, controls and mechanisms are straightforward, practical to execute, allow for enough flexibility to enable growth of the string, and will ensure the credibility of those entities associating with the .BIO gTLD.

Starting Dot's model appears well suited to the task; this is further reflected by endorsements Starting Dot has received for their three other gTLD applications of .ARCHI, .IMMO, and .SKI - all of which have gained strong support from their respective sectors and national and global trade federations. IFOAM, as the global organization for the organic movement, hereby endorses the Starting Dot application for .BIO in an equal fashion.

As IFOAM has continued to investigate the general topic of gTLD's related to our scope of activities, we find the Starting Dot application and approach to be the best suited to serve our objectives. This is much in contrast to the application for .ORGANIC, to which we hereby repeat our opposition, as that unrestricted registry policy application does nothing to allay our fears about the potential for ambiguous, abusive, or insincere attempts to capitalize on the hard-earned achievements of the organic movement. Despite our opposition comment in September 2012 to .ORGANIC, we have not heard from its applicant.

We stay available for further exchange on this topic.

Regards,



Markus Arbenz  
Executive Director



David Gould  
Value Chain Facilitator