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Office of the Secretary of State**

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**James C. Condos, Secretary of State  
Brian H. Leven, Deputy Secretary**

August 8, 2013

Internet Corporation of Assigned Names and Numbers  
ATTN: Jamie Hedlund  
1101 New York Ave, NW  
Washington, DC 20005

**Subject: Concern over restrictions on the Top Level Domains ".INC", ".LLC", ".CORP", and ".LLP"**

Mr. Hedlund,

This letter confirms that The Vermont Secretary of State's Office is charged with registering businesses in the State of Vermont. In addition, my office monitors the position of good standing each of these businesses maintains and their overall right to conduct business transactions or commerce within the United States. I also serve on the Business Services Committee of the National Association of Secretary of States of which a great deal of focus is placed on concerns related to fraudulent business registration, beneficial ownership, and the protection against business identity theft in the United States.

It is my understanding that the Internet Corporation for Assigned Names and Numbers ("ICANN") is in the process of reviewing applications that refer to the business entity designations of INC, LLC, LLP and CORP and that the GAC has issued specific advice related to the issuance of these strings. With the growing national concern related to fraudulent business registration, business identity theft, and online consumer protection this office believes that the Beijing Communique should not be taken lightly and that these strings should only be issued under a community designation in order to ensure the long-term integrity of the extensions. We would encourage ICANN to not only select an applicant that shows sufficient merit to monitor the issuance and maintenance of these extensions, but additionally consider the policies contained within each application and how well the applicant demonstrates their ability to comply with the GAC advise.

It is essential that specific protection mechanisms and registration policies be in place to protect the community of US registered businesses. Many of my colleagues have previously submitted letters to ICANN in relation to our concerns over the issuance of these strings in a non-restricted format. Please consider our appeal requesting that the strings of INC, LLC, LLP, and CORP only be issued to an applicant restricting the use of the extension to registered businesses in the United States which can be verified through the applicable registering body.

Sincerely,



Jim Condos  
VT Secretary of State

