

**Joint Recommendation of the INTA Internet and Anticounterfeiting Committees  
on the Nominet Consultation:  
Dealing with domain names used in connection with criminal activity**

**September 16, 2011**

The INTA Internet and Anticounterfeiting Committees appreciate this opportunity to provide comments on the Nominet consultation: Dealing with domain names used in connection with criminal activity.

We applaud the efforts of the Issue Group in recommending that Nominet institute an abuse policy that specifically addresses criminal activity in its terms and conditions. We strongly support the recommendation for further consultation on whether and in what situations suspension requests from third parties should be considered by Nominet. For example, a process that works on a greatly expedited basis in the more serious cases that involve not just civil infringement, but criminal activity (consumer fraud, phishing, counterfeiting, etc) should be discussed. The principal issue Nominet should consider is where there are breaches of Nominet's terms and conditions by a domain name owner. In those circumstances, the fact that the request may originate from a brand owner rather than a law enforcement agency should not preclude Nominet from acting to suspend a domain name registration in order to protect the public interest.

Thank you for considering our views on these important issues. Should you have questions regarding our submission, please contact INTA External Relations Manager, Claudio DiGangi at: [cdigangi@inta.org](mailto:cdigangi@inta.org) or External Relations Manager, Candice Li, at: [cli@inta.org](mailto:cli@inta.org).