

WIPO



A/33/4

ORIGINAL: English

DATE: July 31, 1998

WORLD INTELLECTUAL PROPERTY ORGANIZATION GENEVA

ASSEMBLIES OF THE MEMBER STATES OF WIPO

Thirty-Third Series of Meetings Geneva, September 7 to 15, 1998

INTELLECTUAL PROPERTY AND ELECTRONIC COMMERCE

Memorandum by the Director General

1. Both the number of users and the range of applications of the Internet have undergone a prodigious expansion in recent years. While it is difficult to quantify with precision the number of Internet users, studies suggest that the number of users grew from 28 million in 1996 to 50 million in 1997, and is estimated to reach 200 million by the year 2001.¹ The expanded range of applications of the Internet has been made possible by enhancements in the technology enabling the interconnection of computers throughout the world—improvements in telecommunications infrastructure, enhancement of the speed and capacity of computers and the development of tools and software permitting a wider scope of activities and higher confidence levels in the authenticity of communications and transactions.

2. The increasing number of users and the expanding range of applications have led to a rapid growth in the commercial interest in, and commercial activity on, the Internet. Electronic commerce—commercial activity transacted through the processing and transmission of digitized data—has quickly become a subject of major economic importance. Again, the widespread and diffused nature of the Internet makes it difficult to quantify the economic value

¹ Data from the IDC Internet Commerce Market Model™ (IDC Predictions 1998: New Power Brokers Reshape the IT Industry) <http://www.idcresearch.com/F/EI/gens16.htm>.

of electronic commerce. Estimates, however, indicate that its value rose from \$US 2.6 billion in 1996 to \$US 8 billion in 1997, and that it may reach \$US 20 billion in 1998.²

3. Electronic commerce is attracting increasing attention from policy makers around the world at both the national and international levels. The subject presents a number of challenges that distinguish it from other policy issues:

- (i) In the first place, the speed of developments in electronic commerce and of the changes it brings place strain on the processes of traditional policy-formulation.
- (ii) Secondly, it touches issues that cross a broad range of technical, legal and economic questions that, by convenience or design, have often been treated organizationally in separate ways or by separate entities.
- (iii) Thirdly, policy makers are confronted more acutely than in other areas with differential participation in electronic commerce and with participants having different levels of awareness of its implications and consequences. In addition, both within and between countries, there are striking disparities in infrastructure development and technical and economic access to the Internet.
- (iv) Fourthly, electronic commerce is conducted on a global medium which requires international coordination and uniformity of approach in order to be exploited to its fullest potential.

WIPO's Program

4. Intellectual property issues are of central importance in maintaining a stable environment for the development of electronic commerce. Intellectual property both affects and is affected by electronic commerce in a multitude of ways. The WIPO Program and Budget for the 1998-99 biennium illustrates the variety and pervasiveness of electronic commerce issues, as demonstrated by the following list of sub-programs:

- (i) Sub-program 03.3 (WIPO Arbitration and Mediation Center), which is concerned with the development of an on-line dispute resolution facility for Internet domain names and other intellectual property disputes between private parties;
- (ii) Sub-program 09.1 (Law of Patents), which deals with the disclosure of technical information on the Internet and its impact on patentability;
- (iii) Sub-program 09.2 (Law of Trademarks, Industrial Designs and Geographical Indications), which is concerned with the use of trademarks on the Internet;
- (iv) Sub-program 09.3 (Protection of Industrial Property Rights in Global Electronic Commerce), which is directed at the development of principles and rules for the effective protection of industrial property rights in electronic commerce;

² *Ibid.*

(v) Sub-program 10.1 (Implementation of the WIPO Copyright Treaty and the WIPO Performances and Phonograms Treaty), which is directed at the promotion of the implementation of these two treaties, which establish rules relating to issues of copyright and neighboring rights raised by digital technology;

(vi) Sub-program 10.2 (Protection of Audiovisual Performances), which is aimed at the adoption of new international norms concerning the rights of performers in respect of audiovisual performances, which were not included in the WIPO Performances and Phonograms Treaty;

(vii) Sub-program 10.3 (Protection of Databases), which is concerned with the possibility of protection of databases, on the international level, beyond the protection provided for original databases by copyright;

(viii) Sub-program 10.4 (Protection of the Rights of Broadcasting Organizations), which is directed at the updating of international norms relating to the rights of broadcasting organizations;

(ix) Sub-program 10.5 (Copyright, Related Rights and Digital Technology), which covers a variety of topics relating to the impact of digital technology on copyright and related rights, including electronic rights management systems and the management of copyright and related rights in the digital environment;

(x) Sub-program 11.4 (Intellectual Property Rights Beyond Territoriality), which is concerned with the challenges to the intellectual property system that are raised by the changing nature of territoriality; and

(xi) Main Program 12 (Global Information Network and Intellectual Property Information Services), which is broadly concerned with infrastructure for the electronic delivery of intellectual property services.

5. The preceding paragraph does not include other activities foreseen in the 1998-99 Program and Budget which reflect the general development of electronic commerce and the infrastructure within which electronic commerce is taking place, such as the enhanced use of the Internet as a means of communication for the Organization and the use of tools developed to support electronic commerce, such as digital signatures, in the delivery of services by the Secretariat under the PCT and the Madrid System.

6. In view of the pervasive nature of electronic commerce issues in WIPO's Program and the speed with which developments are occurring in this area, at the March 1998 session of the Assemblies of Member States at which the Program was adopted, a number of delegations proposed that a sharper focus and a more coordinated approach be adopted by WIPO in relation to electronic commerce. In particular, these delegations underlined the need to achieve more horizontal coordination of the activities of WIPO in this area and the need to develop greater awareness of issues of electronic commerce in those parts of the world where participation is at present least intense.

Proposals for a WIPO Focus on Electronic Commerce

7. In response to the views expressed at the March 1998 meeting of the Assemblies of the Member States, it is proposed that the following activities be undertaken:

- (i) Three regional consultation meetings on intellectual property are proposed to take place in Africa, Asia and Latin America in the last quarter of 1998, in order to generate greater awareness of the ways in which electronic commerce is affecting intellectual property and to assist in formulating a timely and swift response to those issues.
- (ii) It is proposed that the regional consultation meetings be followed by a major international conference in Geneva from March 29 to 31, 1999. The plenary sessions of the conference would address general developments in relation to electronic commerce and the implications of those developments for intellectual property, while working sessions would be held to discuss the impact of electronic commerce on particular areas of WIPO's activities and services.
- (iii) It is also proposed that an issues paper be published in order to define more clearly the impact of electronic commerce on the intellectual property system. The paper would seek to identify and examine the major policy challenges posed to the intellectual property system by electronic commerce and the ways in which the WIPO Program is addressing, or could in the future address, those challenges.
- (iv) The Member States might wish to consider constituting a Steering Committee in order to advise on the implementation of the various sub-programs relating to electronic commerce, on the organization of regional consultations and on the publication of the issues paper. The Committee could meet on an informal basis to advise the Director General in respect of WIPO's activities in this area. In order to be effective and given its informal nature, it would seem desirable that any such Steering Committee be limited in size, while being geographically representative in composition.

8. The budgetary implications of the foregoing proposals are set out in document WO/GA/23/2 ("Policy on Budget Surplus").

9. *The WIPO General Assembly is invited*
- (i) to approve the proposals set out in paragraph 7(i), (ii) and (iii), and*
 - (ii) to constitute an informal Steering Committee to advise the Director General on the implementation of WIPO programs and activities in relation to electronic commerce.*

Internet Domain Names

10. The system for routing traffic on the Internet and, thus, for facilitating electronic commerce, is the domain name system. The domain name system allows computer sites to be

accessed through the domain names given to those sites, upon application, by the administrators of either generic top-level domains (gTLDs), such as .com, .org or .net, or country code top-level domains (cc TLDs), such as .fr (France) or .za (South Africa). Domain names (such as wipo.int) are the human friendly form of numeric addresses, and are easier to remember and to associate with the individual or entity to which the address is attributed.

11. The organization and management of the domain name system has been the subject of intensive discussions throughout the world, particularly over the past two years. These discussions have been motivated by a desire to ensure that the management of the domain name system is institutionalized so as to permit the system to accommodate the growing volume of traffic on the Internet and to be administered in a competitive and open way, taking into account the interests of all stakeholders in the Internet.

12. One of the important issues to have arisen is the relationship between domain names and trademarks. Although domain names were originally intended to perform only the function of facilitating connectivity between computers through the Internet, they have developed into business identifiers because they are easy to remember and use. They are now used in advertising to indicate the presence of an enterprise or business on the Internet. With the growth of the Internet, domain names have increasingly come into conflict with trademarks because of the lack of any connection between the system for registering trademarks, on the one hand, and the system for registering domain names, on the other. The trademark system is administered by a public (governmental) authority on a territorial (either national or regional) basis, granting rights to the trademark holder that may be exercised within that territory. The domain name system, by contrast, is usually administered by a non-governmental organization without any functional limitation—domain names are registered on a first come first served basis and offer a unique global presence on the Internet. The potential for conflict resulting from the two systems of registration has been exploited by persons who have made it a practice to register the trademarks of other persons or enterprises as domain names for themselves (a practice known as “cybersquatting”).

13. The conflict between domain names and trademarks presents unusual features that test the capacity of the ordinary judicial system. The territorial basis of the judicial system cannot ensure a comprehensive solution to such conflicts with global dimensions. Furthermore, litigation can be slow and expensive, with the consequence that it may be far quicker and cheaper for a trademark holder to buy back its rights to a domain name from a cybersquatter, than to seek to assert those rights through litigation.

14. WIPO has been involved in discussions concerning the relationship between domain names and trademarks over the past two years. The Assemblies of Member States at their September 1997 meetings approved the preparations that were being undertaken by the WIPO Arbitration and Mediation Center to develop an on-line, Internet-based system for the administration of procedures for the resolution of domain name disputes (see document WO/GA/XXI/13). Likewise, the provision of such dispute-resolution services by the WIPO Arbitration and Mediation Center was approved as part of the 1998-99 Program and Budget (see sub-program 03.3).

15. It was anticipated that WIPO's dispute-resolution services would be made available, in particular, with respect to disputes concerning a number of proposed new generic top level

domains. However, no consensus has yet developed on the desirability of introducing such new domains, or their system of administration.

16. Most recently, discussions on the future organization and management of the domain name system have been focused on the publication, on June 5, 1998, of a Statement of Policy on "Management of Internet Names and Addresses" (Docket Number 980212036-8146-02) by the Department of Commerce of the United States of America ("the USG White Paper"). The USG White Paper itself follows intensive international discussions and public debate, and contains the following passage:

"The U.S. Government will seek international support to call upon the World Intellectual Property Organization (WIPO) to initiate a balanced and transparent process, which includes the participation of trademark holders and members of the Internet community who are not trademark holders, to (1) develop recommendations for a uniform approach to resolving trademark/domain name disputes involving cyberpiracy (as opposed to conflicts between trademark holders with legitimate competing rights), (2) recommend a process for protecting famous trademarks in the generic top level domains, and (3) evaluate the effects, based on studies conducted by independent organizations, such as the National Research Council of the National Academy of Sciences, of adding new gTLDs and related dispute resolution procedures on trademark and intellectual property holders. These findings and recommendations could be submitted to the board of the new corporation for its consideration in conjunction with its development of registry and registrar policy and the creation and introduction of new gTLDs."

17. WIPO has received indications of considerable international support for its initiation of the international process referred to in the preceding paragraph. Accordingly, the Secretariat has planned and begun that international process, as described in the ensuing paragraphs.

18. Process. It is intended that the process be carried out through a combination of Internet-based consultations, consultations through conventional mail and regional physical consultations in order to ensure the widest possible participation. To this end, a web site has been established to enable Requests for Comments to be posted and comments received from all interested parties. The web site may be accessed through the address <http://wipo2.wipo.int> or through WIPO's main web site, <http://www.wipo.int>, by clicking on "Internet Domain Names."

19. The web site was established at the beginning of July and is available in English, French and Spanish. In the first two weeks of its operation, the site was visited 19,000 times. The site contains an on-line registration form, available for completion by persons interested in participating in the process or in receiving information thereon. In the first two weeks of operation, 301 persons from 35 countries registered their interest in participating by completing the on-line form.

20. In view of the fact that equal access to the Internet is not enjoyed by all persons throughout the world, any important documents posted on the web site will also be sent by mail to all Member States of WIPO and to all non-governmental organizations accredited with observer status. In addition, a series of consultations will be organized in all regions of the world to facilitate discussions on the process.

21. First Request for Comments. On July 8, 1998, the first Request for Comments was posted on the web site and was subsequently sent, together with a press release, to Member States and accredited observer organizations. Comments are requested on the terms of reference for the process, the proposed procedures of the process and the timetable for its completion. The Request for Comments is set out at the Annex to this document.

22. Group of Experts. A group of experts will be established to assist the Secretariat in the formulation of its recommendations to the new not-for-profit corporation that will be responsible for the administration of the domain name system. Although not appointed at the time of writing, it is intended that the experts should represent a geographical balance and a balance of sectoral interests, notably, the interests of the trademark community, the Internet technical community and public interest groups. The task of the experts will be to participate in the regional consultations, to provide explanations in their sphere of expertise and to assist in the formulation of recommendations.

23. The Timetable. The proposed timetable for the process is set out in the Request for Comments set out at the Annex. The pressure for expeditious completion of the process is intense, as it is planned that the new corporation that will administer the domain name system be established by September 30, 1998. The timetable proposed in the Request for Comments seeks to achieve a balance between the need for expedition and the need to ensure that all interested parties have an opportunity to participate.

24. Budgetary Implications. The budgetary implications of the process are set out in document WO/GA/23/2 ("Policy on Budget Surplus").

25. The Results of the Process. It is proposed that the findings and recommendations resulting from the process will be made available to the new corporation being formed to administer the domain name system. This will be reported to the Member States for consideration.

26. *The WIPO General Assembly is invited to approve the undertaking of the international process on Internet domain names described in paragraphs 18 to 25, above.*

[Annex follows]

ANNEX

**REQUEST FOR COMMENTS ON TERMS OF REFERENCE,
PROCEDURES AND TIMETABLE FOR THE
WIPO INTERNET DOMAIN NAME PROCESS (WIPO RFC-1)**

1. This is a Request for Comments (RFC) on the draft terms of reference, proposed procedures and suggested timetable of an international process to be convened by the World Intellectual Property Organization (WIPO) for the development of recommendations regarding certain intellectual property issues associated with Internet domain names.

Introductory Remarks

2. WIPO has been requested to convene an international process to develop recommendations on certain intellectual property issues associated with Internet domain names, including dispute resolution. The recommendations resulting from this WIPO Internet Domain Name Process will be made available to the non-profit organization that will be formed to manage the technical and policy aspects of the Internet domain name system (the "New Organization"), and will be reported to WIPO's Member States. The background to this request and to the management of the Internet domain name system is contained in the Statement of Policy on "Management of Internet Names and Addresses" (Docket Number 980212036-8146-02) issued on June 5, 1998, by the Department of Commerce of the United States of America.

3. WIPO is aware that the international process that it is convening is part of intensive discussions that have taken place in various fora over the last two years in respect of the management of the Internet domain name system. It is intended that the WIPO process take full account of, and build on, the substantial contributions that all interested parties have made in the course of those discussions as they relate to intellectual property. WIPO will also cooperate closely with the New Organization to provide information about the WIPO process and to coordinate with the New Organization's plans.

Draft Terms of Reference

4. The following proposed terms of reference are intended to define the scope of the process, including the principal issues to be addressed therein. Comments are sought from interested parties on these terms of reference and, in particular, whether they encompass and properly define all issues that should be addressed. Interested parties are requested not to address the substance of the issues described in the terms of reference at this stage, but to address only whether issues mentioned are appropriate for the process, whether they are adequately described, and whether any further issues should be included. After the terms of reference have been finalized, a further RFC directed to the substance of the issues described in the finalized terms of reference will be issued.

A. Uniform Approach to Resolving Domain Name Disputes: recommendations will be formulated on methods to prevent and to resolve Internet domain name disputes involving intellectual property rights. In particular, this will include recommendations on the following issues:

Dispute Prevention

- (a) The elements that should be contained in a domain name registration contract including: (i) contact details including email and regular mail addresses (e.g., for purposes of service of process), (ii) certification with respect to the use of the domain name, (iii) certification with respect to the domain name and any related intellectual property rights, (iv) agreement to submit a dispute relating to the status of a domain name to the jurisdiction of particular courts, (v) agreement to submit a dispute relating to the status of a domain name to particular alternative dispute resolution procedures, and (vi) other relevant information or certifications and the need to maintain such information in up-to-date form;
- (b) the related requirements of any database(s) that may be developed to allow domain name applicants, holders of intellectual property rights, and other interested parties to obtain information for purposes of evaluating and protecting any potentially related intellectual property rights. In addition, the appropriate extent of access to any such data may be considered in light of privacy issues;
- (c) the possible use of directory and listing services intended to permit identical names to co-exist on the Internet, and any such other solutions that may contribute to the prevention of disputes.

Dispute Resolution

- (a) Possible approaches, other than court litigation, for the uniform resolution of domain name disputes involving intellectual property rights. Alternative dispute resolution procedures, including various forms of administrative procedures, mediation and arbitration have been developed to address disputes involving domain names. In relation to each of these procedures, some or all of the following issues may be considered:
- (b) the suitability of each such approach for resolving disputes involving domain names;
- (c) whether some or all of the above dispute resolution approaches should be restricted to cases involving cyberpiracy or be available also for conflicts between trademark holders with legitimate competing rights;
- (d) how the above dispute resolution approaches should be adopted and implemented to ensure uniformity. This may include in particular that (i) domain name registrants agree to submit their domain names disputes thereto, and (ii) registries and registrars agree to abide by the determinations resulting therefrom;
- (e) the appropriate extent of a registry's and/or registrar's involvement in the resolution of domain name disputes;

(f) the possible involvement of dispute resolution administering authorities, on which basis and by whom they should be selected, and the coordination reasonably necessary so that any dispute resolution procedures offered are made available to domain name registrants, registrars and registries;

(g) the relationship between any such dispute resolution approaches and the jurisdiction of relevant national courts;

(h) the role of applicable law in any such dispute resolution approaches, and how under choice of law principles that law will be chosen;

(i) the desirability of developing special criteria to be used as a basis for decision in any such dispute resolution approaches as an alternative to relying on any applicable law;

(j) the desirability of providing for suspension in the case of an objection to an existing domain name registration, and if so, whether the suspension should be implemented automatically or as a result of certain expedited procedures;

(k) the extent to which appeal procedures should be incorporated in any such dispute resolution approaches;

(l) the language in which the proceedings under any such dispute resolution approaches are to be conducted;

(m) the desirable timeframe within which domain name disputes should be resolved under any such dispute resolution approaches, and whether the timeframe should vary in relation to the type of dispute;

(n) the extent to which any costs associated with such dispute resolution approaches should be shared and by whom; and

(o) the role of on-line dispute resolution systems for domain name disputes.

B. Process for the Protection of Famous Marks in the Generic Top-Level Domains: recommendations will be formulated regarding the appropriate extent of any protection of famous marks in respect of the registration of Internet domain names in the generic top level domains. In particular, this will include recommendations on the following issues:

(a) whether it is desirable to provide such protection for famous marks, and, if so:

(b) the process and any relevant criteria that may be developed for determining whether such protection should be accorded in any particular case;

(c) the appropriate scope of such protection including its potential pro-active or retroactive effect;

- (d) the desirability of providing any provisional protection during the pendency of any proceedings, and whether any such provisional protection should be made available prior to the introduction of any new gTLDs;
- (e) the relationship between any such protection for marks determined to be famous for purposes of Internet domain names and the protection of “well-known” marks under the Paris Convention for the Protection of Industrial Property;
- (f) the development, administration and content of any database(s) listing the status of any marks determined to be subject to such protection;
- (g) the desirability of extending any such protection to any ccTLDs; and
- (h) the availability of procedures to obtain the cancellation of such protection.

C. Addition of New Generic Top-Level Domains and Related Intellectual Property Rights: an investigation will be made of the nature and extent of problems resulting from the interface between the registration of Internet domain names and intellectual property rights, particularly trademarks and personality rights.

The investigation will take into account any studies that may have been conducted on the subject, and any relevant information (including empirical data) that may be provided by interested parties participating in the process, including relevant experiences in relation to gTLDs and ccTLDs.

In particular, the investigation will address:

- (a) the demonstrated effects to date on intellectual property rights resulting from the existing TLDs, and in particular, the satisfaction or dissatisfaction with related dispute resolution approaches; and
- (b) the anticipated and, where possible, actual effects of adding any new gTLDs on trademark and other intellectual property right holders. This aspect of the investigation might consider, from an intellectual property point of view, whether any new gTLDs should be introduced in relation to certain categories of registrants or activities (e.g., for individuals or in relation to existing systems such as the Nice Classification of Goods and Services for the Purposes of the Registration of Marks), and the extent to which compliance with any such categories should be verified at the registration stage.

5. While the above are the main topics to be addressed, the panel of experts will assist WIPO in developing, on the basis of comments received on the present WIPO RFC-1, a final list of all issues on which comments shall be solicited and recommendations formulated.

Proposed Procedures

6. The WIPO Internet Domain Name Process is to be conducted in a balanced and transparent manner and to that end WIPO invites all interested parties, including trademark holders and members of the Internet community who are not trademark holders, to participate. The objective will be to obtain consensus among all stakeholders of the Internet on the issues concerned.

7. WIPO intends to constitute an internationally and sectorally representative panel of experts to assist in the process. The composition of this panel will be made available under the **Experts** section of the special web site developed in support of the WIPO Internet Domain Name Process (the "Web Site").¹

8. The process will be undertaken through a combination of Internet-based discussions and in-person consultations. It will be conducted on the basis of a number of RFCs, including this WIPO RFC-1, that are to be made available to the public through publication on the Web Site or through transmittal by electronic or regular mail. All participating parties are invited to submit comments on the RFCs through a special form that is available under the **RFCs & Comments** section of the Web Site, or by electronic or regular mail.

9. After receiving a comment, WIPO will acknowledge its receipt, review the comment and make it publicly available by posting. WIPO, however, reserves the right not to post any comment that is obscene or otherwise clearly fails to constitute a contribution relevant to the discussion on the issues raised in the RFCs. WIPO will not issue any specific responses to the comments it receives. All comments, however, will be made available to the panel of experts and will form the basis for the formulation of the recommendations to be submitted to the New Organization.

10. In order to ensure that interested parties have the opportunity to present their views on the issues to be addressed by the process, WIPO will also hold a series of regional hearings and consultations, at which members of the panel of experts will be present. The location of these meetings will be determined with a view to ensuring full geographical representation. Any views presented at these meetings will, in addition to the comments on the RFCs, serve as the basis for the recommendations to the New Organization.

Timetable

11. There is a need for the WIPO process to move forward on an accelerated basis. The process is intended to consist of the following steps, culminating in a final report to be submitted to the New Organization and reported to WIPO's Member States:

(a) publication of the present WIPO RFC-1 on the draft terms of reference setting out the proposed scope of the project, including the issues to be addressed, the proposed procedures and a suggested timetable for completion of the work;

¹ This web site is located at <http://wipo2.wipo.int>.

- (b) meeting of the panel of experts to assist WIPO in settling the terms of reference on the basis of the comments received on WIPO RFC-1 and preparation of WIPO RFC-2 soliciting comments on all issues on which recommendations are to be formulated;
- (c) publication of WIPO RFC-2;
- (d) regional hearings and consultations with the panel of experts on the issues raised in WIPO RFC-2;
- (e) preparation of WIPO RFC-3 in the form of a draft interim report on the basis of all comments received on WIPO RFC-2;
- (f) publication of WIPO RFC-3;
- (g) regional hearings and consultations with the panel of experts WIPO RFC-3;
- (h) preparation and publication of the final report on the basis of all comments received on WIPO RFC-3.

12. It is expected that the process will take under 8 months to be completed. As mentioned above, WIPO will seek to coordinate with the New Organization's plans. The following table proposes a draft implementation plan, reflecting the various stages in the process.

Date	Event/Activity
July 8, 1998	Publication RFC-1 (terms of reference)
August 17, 1998	Deadline for comments on RFC-1
Second half of August 1998	Meeting of Panel of Experts
September 14, 1998	Publication of RFC-2 (issues to be addressed)
September – October 1998	Regional Hearings and Consultations
October 30, 1998	Deadline for comments on RFC-2
December 1, 1998	Publication of RFC-3 (interim report)
December 1998 – January 1999	Regional Hearings and Consultations
January 29, 1999	Deadline for comments on RFC-3
March 1, 1999	Publication of final report

Request for Comments

13. This WIPO RFC-1 requests participating parties to submit comments on:
 - (a) the draft terms of reference, as specified in paragraphs 4 and 5 above;
 - (b) the proposed procedures, as specified in paragraphs 6 through 10 above;
 - (c) the proposed timetable, as specified in paragraphs 11 and 12 above.
14. Comments can be submitted by the following means:
 - (a) through the **Submit Comment** form that is available under the **RFCs & Comments** section of the Web Site. We recommend that you choose this method for the submission of your comments;
 - (b) by electronic mail to the following address: process@wipo2.wipo.int;
 - (c) by regular mail to the following address: WIPO Internet Domain Name Process, World Intellectual Property Organization, 34 chemin des Colombettes, P.O. Box 18, 1211 Geneva 20, Switzerland.
15. All comments must be received by August 17, 1998.

[End of Annex and of document]