

Suzanne R. Sene
Office of International Affairs
National Telecommunications and Information Administration U.S.
Department of Commerce
1401 Constitution Ave., NW, Room 4701
Washington, DC 20230

Re: Midterm Review of the Joint Project Agreement (Docket No.
071023616-7617-01)

Dear Ms. Sene:

As the Global Head of Data Privacy of InterContinental Hotels Group (IHG), I write in opposition to termination of the current Joint Project Agreement (JPA) with ICANN.

InterContinental Hotels Group PLC of the United Kingdom is the world's largest hotel company. We own, manage and franchise several of the world's most famous global hotel brands, including InterContinental(r), Holiday Inn(r), Holiday Inn Express(r), Crowne Plaza(r), Staybridge Suites(r), Candlewood Suites(r) and Hotel Indigo(r) - a total of over 3,600 hotels and 537,500 guest rooms in nearly 100 countries and territories around the world.

Internet commerce transactions are vital to our business. Our customers booked more than \$1 billion on our websites last year, and our Holiday Inn website was the most frequently visited hotel brand site in the world.

IHG has participated actively in the ICANN process in recent years, most notably in the policy development process regarding the Whois database. From our experience in the ICANN process, we strongly believe that the JPA should not be terminated. Contrary to ICANN's assertions, although ICANN has made some progress, it has not achieved the objectives specified in the JPA.

Although we have been told by ICANN leadership that ICANN welcomes greater participation from companies such as ours in the business community, we have not found that to be the case. Indeed, we have found ICANN's policymaking process to be divorced from ICANN's own public comments process -- officially inviting public comment but then seemingly disregarding many of the views expressed, even if those views constitute a solid majority of the total comments filed. Clearly, ICANN has much work yet to do in how to manage its public comments process and how to actively involve greater private sector participation.

Rather than discussing termination, NTIA and ICANN could better use the mid-term review as an opportunity to make a mid-course correction in the JPA. It would be helpful to refocus the relationship between NTIA and ICANN by

defining more concrete, measurable and specific goals whose fulfillment would represent actual "achievements" by ICANN -- instead of mere "activity" in a particular area.

The remaining 18 months of the current JPA should also be dedicated to robust discussion about the next step in the relationship between ICANN and the U.S. Government, keeping in focus the need to realize the original vision of a private-sector-led system for administering the domain name and addressing systems. A critical unmet need is to ensure that private sector entities that are significantly affected by ICANN decisions, but which do not have a contractual relationship to ICANN, play a leadership role in the organization. We know from our experience at InterContinental Hotels Group that this is not yet the case today.

Sincerely,

Lynn Goodendorf
Global Head of Data Privacy
InterContinental Hotels Group