

March 8, 2013

**RxRights Coalition
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Canadian International
Pharmacy Association

Pharmacy Accreditation
Services

New York StateWide
Senior Action Council

Oregon State Council
for Retired Citizens

United Seniors of
Oregon

Carmen Catizone, Executive Director
National Association of Boards of Pharmacy
1600 Feehanville Drive
Mount Prospect, IL 60056

via email: CCatizone@nabp.net

Dear Mr. Catizone,

I am writing on behalf of RxRights.org in regard to the application of the National Association of Boards of Pharmacy (NABP) to the Internet Corporation for Assigned Names and Numbers (ICANN) to establish and operate the .PHARMACY generic top level domain (gTLD) as a community gTLD for domain registrations for bona fide pharmacies. We support the goals of your application, especially the provision of a vetted gTLD space at which consumers can find regulated pharmacies providing authentic versions of the medications they seek as well as educational materials pertaining to this subject, and can avoid “rogue” purveyors of counterfeit drugs.

RxRights.org is a coalition concerned about the high cost of U.S. pharmaceuticals. We are dedicated to promoting and protecting American consumer access to sources of safe, affordable prescription drugs. U.S. drug costs remain a serious and growing problem; for example, 48 million Americans ages 19-64 did not fill a prescription due to cost in 2010, according to the Commonwealth Fund – a 66% increase since 2001. Indeed, it is estimated that the number of Americans who go without needed prescription drugs due to cost is greater than the entire population of Canada.

RxRights.org is the voice of millions of Americans across the United States who have declared that the prices in the U.S. are too high and have turned to safe sources outside the United States that enable them to maintain their required medical regimen and not have to choose between electricity, heat, food or life-saving drugs. Individuals and organizations including licensed Canadian and international pharmacies that meet high standards of safety (including accreditation as a licensed pharmacy requiring a valid prescription) are part of the RxRights.org Coalition. The Canadian International Pharmacy Association (CIPA), a group of licensed retail pharmacies that sell pharmaceuticals to more than a million American citizens each year; PharmacyChecker.com (PC), an American company that evaluates online pharmacies; and Pharmacy Accreditation Services (PAS), an independent organization that surveys and accredits pharmaceutical care facilities around the world are members of the RxRights coalition – and this letter is focused on the question of whether CIPA, PC, and PAS affiliates and members, and other licensed and regulated international pharmacies will be able to obtain and retain .PHARMACY domain registrations. We are additionally concerned that administration of the .PHARMACY gTLD in a manner that does not include safe Canadian and International pharmacy sites will negatively affect American consumers by leaving them prey to unscrupulous rogue sites that use deceptive and underhanded mechanisms.

RxRights.org is concerned that the registration eligibility agreement to be developed for all .PHARMACY registrants may seek to disqualify fully regulated and legitimate Canadian pharmacies, including members of CIPA, PC and PAS from either registering .PHARMACY domains in the first instance, or will strip them of established domains. Such actions would be anti-competitive and detrimental to consumer welfare.

We therefore seek firm assurances that NABP, as .PHARMACY registry operator, will refrain from adopting a registration agreement which results in such discriminatory treatment – the goal of .PHARMACY should be to provide a trusted space in which only licensed and regulated pharmacies selling legitimate drugs can establish websites. It should not be used to pursue a cross-border sales agenda that is best left to elected officials and trade representatives as well as national law enforcement and drug regulatory agencies.

In the absence of expeditious receipt of such assurances we shall have no alternative but to give serious consideration to the filing of a Community Objection under available ICANN procedures (current filing deadline of March 13th 2013), as well as continuing communications with policymakers in both Canada and the United States, the European Commission, members of ICANN’s Governmental Affairs Committee (GAC), ICANN Board members, and other relevant parties to raise concerns about the potential anti-competitive and anti-consumer effects of .PHARMACY.

In addition, absent the requested assurances we will likely engage the media and American citizens directly to alert them to the potentially detrimental public health ramifications of a .Pharmacy gTLD that denies domain registrations to licensed and regulated pharmacies dispensing genuine pharmaceuticals. However, we sincerely wish to avoid such confrontation and would greatly prefer to work cooperatively with NABP toward shared goals of consumer protection and elimination of rogue online pharmacies. We therefore hope to receive responsive written assurances from you no later than 12 noon Eastern time on Tuesday, March 12th.

Specific Assurances Sought

We would like specific assurances from NABP to ensure that the application of the .PHARMACY registration agreement as applied to CIPA, PC and PAS members and similarly situated pharmacies will:

- (1) allow them to register their domains in the same manner as regulated U.S.-based pharmacy counterparts; and
- (2) not exclude them via any Registrant Eligibility policy changes at some future point in time;

In addition, we would like assurance that CIPA, PC, and PAS as well as public interest groups that help educate the public in regard to safe online medical purchases and the best means to avoid rogue pharmacies are permitted to secure and operate .PHARMACY domains.

Relevant Provisions of the .PHARMACY Application

We have carefully reviewed the .PHARMACY application and note the following provisions that are of particular relevance to this communication:

- Section 18a states the mission and purpose of the proposed .PHARMACY gTLD – “**the .PHARMACY gTLD shall serve as a trusted, hierarchical, and intuitive namespace for legitimate Internet pharmacies. All registrants within this gTLD will be vetted prior to registration to ensure that they meet all applicable regulatory standards, including pharmacy licensure, drug authenticity, and valid prescription requirements. In addition, the registry will incorporate both active and passive safeguards into its operation to ensure that these registrants continue to abide by the terms and conditions set forth in their registration agreements... NABP is still analyzing potential use case options regarding the type of domain names and registrants that will be permitted to be registered within .PHARMACY. While at the outset the coalition consisted primarily of North American entities, the coalition recognized the global scope of this undertaking and has been actively engaged in ongoing education and outreach throughout the global community. Following this initial outreach, the members of the coalition will discuss potential best practices within the .PHARMACY gTLD, which will be mandatory in all domain name registration agreements.... NABP is currently evaluating a validation process whereby only online pharmacies and related entities that meet all**

regulatory standards in the jurisdictions in which they are based and in which they do business, including pharmacy licensure, drug authenticity, and valid prescription requirements, as applicable, would be permitted to register in .PHARMACY. These qualified online pharmacies would only be permitted to register a domain name corresponding to their business or trade name... All domain names within .PHARMACY would be subject to suspension and/or cancellation upon the violation of the terms and conditions set forth in the domain name registration agreement. In addition, the registry will incorporate active and passive safeguards into its operation to ensure that these registrants abide by the terms and conditions set forth in their registration agreements.” – We concur with most of your goals for the .PHARMACY namespace, as well as the concept of prior vetting to assure compliance with all applicable regulatory standards. We also appreciate the initial focus on North American registrants, which would certainly include Canadian pharmacies. However, we are concerned that ICANN is being asked to evaluate and approve this application when the types of permissible domain names and registrants have yet to be determined, and when the mandatory best practices to be contained in the registration agreements have yet to be formulated. We support the proposed validation process “whereby only online pharmacies and related entities that meet all regulatory standards in the jurisdictions in which they are based and in which they do business... would be permitted to register in .PHARMACY”; however, it is unclear whether a Canadian or other pharmacy meeting all applicable standards yet transacting business with non-Canadians would be considered to be conducting business in their home countries or in each of the jurisdictions with which it transacts business, as it is a practical impossibility to comply with the regulations of a jurisdiction in which one has no physical presence. Finally, it is impossible to judge the fairness of a registration agreement which will be used to reject registration applications or for subsequent suspensions or cancellations when the agreement has not yet been developed.

- Section 18b addresses how the proposed .PHARMACY gTLD will benefit registrants, Internet users, and others – **“Establish a trusted online marketplace for consumers seeking legitimate pharmaceuticals from lawful online pharmacies... Eliminate the need of defensive registrations because .PHARMACY domain names will be allocated only to properly vetted and qualified entities; and- Incorporate post-registration safeguards, both active and passive, to ensure that registrants continue to act in compliance with the terms and conditions of their registration agreements... Consumers will also have confidence that the online pharmacies using a .PHARMACY gTLD are properly vetted and audited to ensure best-in-class standards, thus minimizing the potential of receiving counterfeit or substandard pharmaceuticals... NABP and the coalition believe that the .PHARMACY gTLD will provide a single trusted ecosystem where every registrant in the gTLD will be properly vetted prior to registration, subjected to ongoing monitoring for compliance, and operated in accordance with applicable laws... As previously stated, NABP will have safeguards in place to ensure that only authorized online pharmacies that meet all regulatory standards, including pharmacy licensure, drug authenticity, and valid prescription requirements, are able to register in the .PHARMACY namespace. One of the members of the coalition identified above in Section 18.1.2 is LegitScript, the largest Internet pharmacy verification program in the world, and the only Internet verification program identified by the NABP, other than its own, that meets NABP standards. NABP and LegitScript are looking at authentication processes to speed the review and vetting of potential registrants within the .PHARMACY gTLD. While both parties have extensive experience in connection with North American pharmacies, they will seek to develop a best practice verification process for all pharmacies globally, working with international coalitions such as FIP and agencies such as the WHO.”** – We concur that consumers will benefit from creation of a trusted .PHARMACY marketplace, and industry participants will benefit from the reduction of a need for defensive domain registrations. However, while CIPA, PC, and PAS members “meet all regulatory standards, including pharmacy licensure, drug authenticity, and valid prescription requirements” it is not at all clear that they would be allowed to register .PHARMACY domains, especially considering the vetting role to be assigned

to LegitScript. As you are well aware, CIPA and PC members are generally deemed “unapproved” by LegitScript because they are not domiciled or licensed in the U.S. As NABP is proposing to operate the gTLD for the benefit of legitimate regulated pharmacies on a global basis it would be incompatible and discriminatory to have registrant vetting standards that are U.S.-centric.

- Section 18c addresses gTLD operating rules that will eliminate or minimize social costs – **“All potential domain name registrants within this gTLD will be vetted to ensure that they meet all regulatory standards, including pharmacy licensure, drug authenticity, and valid prescription requirements before being able to register in the .PHARMACY namespace. In addition, the registry will incorporate both active and passive safeguards into its operation to ensure that these registrants continue to abide by the terms and conditions set forth in their registration agreements... NABP does not currently envision any advantageous pricing, introductory discounts, or bulk registration discounts given the projected limited size of the namespace. However, NABP is open to evaluating and potentially implementing any marketing initiatives that may be proposed from within the community.”**—Again, while CIPA, PC, and PAS members can readily satisfy all the referenced regulatory standards, they could nonetheless face denial or termination of domain registrations if found in violation of a not yet drafted registration agreement. We also find it striking that NABP foresees no “advantageous pricing” benefits from the .PHARMACY namespace yet may be contemplating policies that prevent domain registrations by entities that have a proven track record of providing advantageous pricing, and thereby connect patients with critically needed medicines they might otherwise do without due to price considerations.
- Section 20a describes the community that .PHARMACY is to serve – **“The National Association of Boards of Pharmacy (“NABP”) is submitting this application with the support of international pharmacy coalitions and national pharmacy associations to ensure that the .PHARMACY gTLD shall serve as a trusted, hierarchical, and intuitive namespace for legitimate Internet pharmacies. NABP is committed to serving the community of legitimate online pharmacies and other prescription drug-related entities and educators... At the hub of this community is patient safety... This legal and regulatory framework in the U.S., and similar frameworks in other developed countries, was established to protect the public health, and forms the hub of this community. Illegal online drug sellers have found that it is highly profitable to circumvent these laws and standards, spurring the proliferation of rogue Internet drug outlets, many selling adulterated, unapproved, and even counterfeit drug products without a prescription or medical oversight. By establishing the .PHARMACY gTLD community, NABP and its global coalition aim to establish a delineated environment in which legitimate pharmacies and related entities can conduct business, and where consumers can find those entities that engender patient safety.”** – CIPA, PC and PAS members are legitimate online pharmacies and therefore should be welcomed into the .PHARMACY community. They are dedicated to patient safety and are fully subject to strong pharmaceutical regulatory frameworks.
- Section 20b explains the applicant’s relationship to the community – **“NABP serves a broad array of pharmacy and other prescription drug-related entities through its various accreditation programs, which include:-The Verified Internet Pharmacy Practice Sites (VIPPS) program, which accredits online pharmacies that uphold laws and meet the highest standards of pharmacy care”** – Again, while CIPA, PC and PAS pharmacy members are licensed and regulated sources of legitimate drugs, the VIPPS program, if used as a model for registrant review, presents a significant and unfair barrier to domain registration. While CIPA, PC and PAS members comply with many VIPPS accreditation standards, they do not in regard to those that require licensure in all jurisdictions in which patients exist rather than where the entity is domiciled; require a U.S. domicile; require compliance with U.S. laws rather than the laws of the nation in which it is located and regulated; and limit domain name registrations to those that “have a logical nexus to the dispensing pharmacy”. Given that the purpose of .PHARMACY is to serve the global

pharmacy community and its consumers, we seek assurance that criteria will not be employed in a restrictive and competition-suppressing manner.

- Section 20c provides a description of the community to be served by .PHARMACY – **“The primary mission and purpose of the .PHARMACY gTLD is to serve as a trusted, hierarchical, and intuitive namespace for legitimate Internet pharmacies and related entities to conduct business, and to create a safe online marketplace in which consumers can purchase legitimate medicine and obtain reliable services and information related to their prescription medications. The .PHARMACY namespace will represent, and thereby identify, exclusively those entities that operate in compliance with applicable national and local laws. Internet users will have confidence that all registrants using a .PHARMACY gTLD are properly vetted and audited to ensure best-in-class standards. Additionally, this framework will help to distinguish those online drug sellers that do, and do not, comply with applicable laws, thus minimizing consumers’ exposure to counterfeit or substandard pharmaceuticals.**

NABP is also filing this application to advance important public policy considerations, e.g., the health, safety, and well-being of individuals that have been harmed by counterfeit or substandard pharmaceuticals.” – While we agree wholeheartedly with this mission statement it is impossible to know what the contemplated definition of “applicable national and local laws” will be absent the registration agreement.

- Section 20d addresses the relationship between the .PHARMACY string and the community – **“The .PHARMACY gTLD will represent legitimate, law-abiding entities throughout the global pharmacy community.”** – All CIPA, PC and PAS members are legitimate and law-abiding pharmacies.
- Section 20e describes the critically important subject of NABP’s intended registration policies for .PHARMACY – **“Eligible registrants will demonstrate compliance with the laws of the jurisdiction in which they are based, as well as in all jurisdictions in which they conduct business... Registrants found to be out of compliance with these terms and conditions will be denied a .PHARMACY domain name, or will have their existing .PHARMACY domain name revoked. In the event that a domain name is denied or revoked, registrants will have access to an appeal process. Details of this appeal process have yet to be finalized but will be modeled on the appeals process used by NABP for its many accreditation programs.** – This section encompasses the heart of our concerns about intended discriminatory and anti-competitive treatment of CIPA and PC members. Both the registration agreement and the appeals process are far from final. The definition of “jurisdictions in which they conduct business” cannot be discriminatory.

Additional Causes for Concern

In addition to the cited provisions of the .PHARMACY application, we are also concerned by certain other statements made by NABP that may indicate an intention to exclude licensed and fully regulated Canadian and other international pharmacies from securing .PHARMACY domain registrations.

For example, at the portion of the NABP website providing consumer information in regard to “Buying Medicine Online” the following content appears (<http://www.nabp.net/programs/consumer-protection/buying-medicine-online/>):

And that Canadian online pharmacy with the cheaper prices? It may be calling itself a “Canadian pharmacy,” but it may actually obtain its medications from countries in Asia, South America, or Eastern Europe, where quality standards are more lax and counterfeit medications more widespread. While counterfeit medications can surface anywhere, they are significantly more common in developing foreign countries. That is the problem with buying medicine from foreign sources – you never know what you’re getting.

While there are some excellent Canadian Internet pharmacy sites, NABP cannot recommend any Canadian site selling drugs to Americans because Food and Drug Administration (FDA) regulations prohibit this activity. Prescription drugs imported from other countries are not FDA-approved and their safety and effectiveness cannot be ensured because they are outside the legal structure and regulatory resources provided by Congress.

We share your concern about “Canadian Pharmacies” that are not only “not Canadian” but dangerous websites – which is all the more reason why licensed and regulated Canadian, as well as other pharmacies should be permitted to register and retain .PHARMACY domains in order to differentiate themselves from the imposters. And while we appreciate the concession that “there are some excellent Canadian Internet pharmacy sites”, we are concerned that NABP may seek to import its non-recommendation position to block registration of .PHARMACY domains by legitimate Canadian online pharmacies that transact business with foreign citizens, including those in the U.S. NABP should not confuse its right to adopt and advocate certain policy positions within the U.S. with its responsibility to operate .PHARMACY in a manner that is consistent with its stated intent to serve the global community of licensed and regulated pharmacies, as well as with the pro-competitive ends stated by ICANN for the new gTLD program. The fact that non-U.S. pharmacies are not licensed by U.S. states and regulated by the FDA cannot justify denial of their ability to use a global Internet resource, particularly when their admission to the .PHARMACY namespace will assist consumers in differentiating legitimate pharmacies dispensing authentic drugs from rogue pharmacies purveying dangerous or ineffective counterfeits. Also, as you are no doubt aware, it is permissible and the common practice for FDA agents to permit personal importation of drugs from non-U.S. pharmacies by U.S. residents.

Similarly, we note that “NABP’s criteria for legitimately operating Internet pharmacies are based on federal and state pharmacy laws and practice standards established in the United States to protect the public health.”(<http://www.nabp.net/programs/consumer-protection/buying-medicine-online/criteria>) While a US-centric approach may be perfectly valid for your organization in its policy and advocacy roles, it is completely inappropriate for NABP in its contemplated role as registry operator for .PHARMACY. As stated in your press release of June 12, 2012:

“NABP has applied for .PHARMACY as a community-based application representing legitimate online pharmacies and prescription drug-related organizations worldwide... NABP will ensure that only legitimate Web site operators that adhere to pharmacy laws in the jurisdictions in which they are based and to which they sell medicine will be able to register domain names in .PHARMACY. The ultimate benefactors of this new gTLD will be the health care community and patients worldwide, who will be assured that all pharmacy sites ending in the .PHARMACY gTLD are safe and legitimate... As stated, NABP has applied as a representative of the global pharmacy community, which includes independent community pharmacies, chain drug stores, Internet pharmacies, schools and colleges of pharmacy, patient advocacy groups, pharmaceutical manufacturers, and wholesale distributors of prescription medications.

This press release makes clear that .PHARMACY is intended to be a global online resource. Yet the reference to adherence to pharmacy laws “in the jurisdictions in which they are based and to which they sell medicine” indicates that NABP may intend to use its operational control over .PHARMACY to pursue an agenda that would falsely adjudge licensed and regulated non-U.S. pharmacies as undeserving of a .PHARMACY domain.

Finally, we note that NABP’s January 2013 Progress Report on its Internet Drug Outlet Identification Program (http://www.nabp.net/system/redactor_assets/documents/161/NABP_Internet_Drug_Outlet_Report_Jan2013.pdf) states that “the Association is joining forces with the global pharmacy community to develop the .PHARMACY generic Top Level Domain (gTLD), a new online space exclusively for legitimate operators”. Yet the same report goes on to state that NABP “continues to recommend that US patients use Internet pharmacies accredited through the VIPPS...programs when buying medication online” -- when the VIPPS program requires US domicile for approval regardless of the strength of the regulatory regime for and the patient protection practices of non-U.S. pharmacies.

CIPA PC and PAS Member Practices Justify Eligibility for Registration and retention of .PHARMACY Domains
Regulatory compliance and patient protection concerns cannot justify exclusion of CIPA, PC and PAS members from .PHARMACY domain registrations. As noted on CIPA’s website, for instance:

A new report, by the prestigious U.S.-based National Bureau of Economic Research confirms that medications sold by online pharmacies accredited by the Canadian International Pharmacy Association (CIPA) are 100 percent authentic. Test results show no difference in drug safety when compared to products from U.S. online pharmacies approved by American verifiers. The report also indicates that U.S. pharmacies on average charge 52.5 percent more for the same five top-selling brand-name medications. The scientific study, “Unveiling the Mystery of Online Pharmacies: An Audit study,” was conducted by Roger Bate, Ph.D., and Aparna Mathur, Ph.D., of the American Enterprise Institute along with Ginger Zhe Jin, Ph.D., from the University of Maryland Department of Economics.

The audit, performed in two rounds between 2009 and 2011, analyzed several popular maintenance medications and one lifestyle product: a total of 370 samples from 41 individual U.S. and Canadian or international online pharmacy websites. The majority of the website sources, and all of the Canadian sites, were accredited by CIPA. Many of the Canadian and other international sites were also approved by PharmacyChecker.com, a reputable independent verifier of online pharmacies, both within and outside the U.S. (<http://www.cipa.com/>)

A Wall Street Journal story reporting on the study stated:

To both reassure and protect patients, there are organizations that vouch for the authenticity of certain Web pharmacies, the NBER study explains.

[Verified Internet Pharmacy Practice Sites](#), from the National Association of Boards of Pharmacy, and LegitScript.com certifies Internet pharmacies based in the U.S. **PharmacyChecker.com reviews those from other countries including Canada, the U.K. and Israel. The Canadian International Pharmacy Association — well, you get it.** (Emphasis added - <http://blogs.wsj.com/health/2012/03/29/maybe-internet-pharmacies-arent-as-risky-as-we-thought/>)

CIPA, PC and PAS members sell pharmaceuticals and maintenance medications (but not controlled substances). CIPA, PC and PAS member pharmacies have maintained a 100 percent perfect safety record, while serving about a million Americans each year. CIPA, PC and PAS members sell prescription drugs made by the leading name-brand manufacturers at prices up to 80 percent less than U.S. retailers. And CIPA, PC and PAS pharmacies follow the same prescription process as U.S. mail-order companies, requiring a valid and signed prescription from the patient’s doctor or health care provider.

Specifically, CIPA, PC and PAS members abide by the following stringent standards to ensure patient safety:

- Require a valid prescription before dispensing medications;
- Obtain demographic and medical information from the patient and maintain a health profile with medication history to avoid adverse drug interactions;
- Have a licensed pharmacist on staff to supervise dispensing of medications and to be available for consultation upon patient request; and
- Have procedures to ensure patient privacy and confidentiality of personal records and contact information.

Our concerns about anti-competitive intent on the part of NABP in its operation of the .PHARMACY gTLD has been echoed by PharmacyChecker.Com, cited as a trusted party in the Wall Street Journal story referenced above. PharmacyChecker.Com filed comments urging ICANN to reject your .PHARMACY application, stating:

We urge you to reject NABP’s gTLD application for .PHARMACY over concern that its misuse will impede online access to safe and affordable medicine, against the public interest and the community to which the gTLD is targeted – consumers seeking medication.

The NAPB maintains a U.S. protectionist approach toward online pharmacies, which reduces consumer access to licensed, lower-cost pharmacies operating in Canada and other countries. NABP explicitly proposes to prohibit .PHARMACY registration to such international online pharmacies, regardless of their

safety. NABP's program conflicts with moral imperatives of human rights law, including the Universal Declaration of Human Rights, designed to protect citizens' access to the highest attainable standard of health, which includes access to affordable medicine.

The NABP's online pharmacy programs and their funding belie its agenda to wrongly conflate safe international online pharmacies with dangerous "rogue" websites...

Conspicuously absent from NABP's application is support from independent NGOs dedicated to consumer health. Instead, the organizations named in the application as "partners" and providing endorsement letters include Eli Lilly (which pledges \$200,000 to assist with the application), other pharmaceutical and pharmacy companies, and organizations supported by these companies. These entities have an established history of lobbying the U.S. government to oppose safe international online pharmacies and conflating such pharmacies with the worldwide counterfeit drug problem.

We believe NABP's application is largely an initiative of pharmaceutical and U.S. pharmacy businesses to dictate which websites should be considered legitimate pharmacies on a global scale. Granting the gTLD .PHARMACY authority to NABP may transform the Internet into a captive pharmaceutical marketplace, reducing consumer access to affordable medication.

While we believe the above concerns are valid, we are hoping to avoid the need to pursue such opposition – if we can receive assurances that NABP will not exclude CIPA, PC and PAS members from domain name registrations at .PHARMACY. Absent such assurances we will have no choice but to amplify our efforts to assure that .PHARMACY is open to all licensed and regulated pharmacies that sell authentic medications regardless of their nation of domicile.

Conclusion

Our goals are similar to NABP's stated goals for .PHARMACY – to see it function as a trusted gTLD where consumers can find safe drugs from licensed and regulated pharmacies. But this must be done in a manner that does not stifle competition and in which the registry operator does not attempt to take on roles best left to law enforcement and industry regulators. Most importantly, as NABP recognizes the target end consumer of .PHARMACY are people looking for medication online, its gTLD policies must not curtail access by Americans to needed, lower-cost genuine medication from non-U.S. online pharmacies, which would be detrimental to the public health.

We seek to assure that U.S. residents will be able to continue to obtain information and order medications from safe Canadian and International online .PHARMACY websites as they have done for the past decade from .Com and similar general purpose gTLDs.

A safe website would:

- Only dispense upon receipt of a valid prescription
- Dispense under the supervision of a licensed pharmacist
- Dispense from a government authorized facility and only dispense government approved medications
- Sell no controlled substances or narcotics or pseudo ephedrine products
- Never send unsolicited emails (SPAM)
- Provide the highest standard of security to protect personal and medical information.
- Be inspected for standards and safety by a reputable pharmacy inspector

There can be no valid reason to exclude online pharmacies that operate in such a manner from .PHARMACY domain registrations.

We look forward to your response and to working cooperatively toward shared consumer protection goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee J. Graczyk", is centered within a light gray rectangular box.

Lee J. Graczyk, Lead Organizer
RxRights.org
2550 University Ave W.
Suite 350S
St Paul, Minnesota
1-866-703-5442

CC: Josh Bourne, Fairwinds Partners