

NOKIA

1101 Connecticut Ave. N.W., Suite 910, Washington, D.C. 20036

April 19, 2000

Department of Commerce
Room 5876
14th & Constitution Avenues, NW
Washington, DC 20230

Re: Public Comments

Attention of Sabrina McLaughlin,
Office of General Counsel

VIA:
Facsimile: (202)482-0512
and
Electronic: DamainName@doc.gov

**Before The
Department Of Commerce**

**Public Comments on Dispute Resolution Issues Relating to Section
3002(b) of the Anticybersquatting Consumer Protection Act**

**Comments of
Nokia Inc.**

Nokia Inc. ("Nokia") submits these comments in response to the Notice printed in the April 6, 2000 Federal Register (Volume 65, Number 67) seeking Public Comments on Dispute Resolution Issues Relating to Section 3002(b) of the Anticybersquatting Consumer Protection Act. Nokia Inc. appreciates the opportunity to present its views to the Department of Commerce concerning this important subject.

Nokia believes that the Internet has introduced significant new complexities to the effective protection of trademarks. We are exceedingly concerned with the numerous cases in recent years of companies -- from Nike to Nokia -- being coerced to "purchase" their names or trademarks from other parties who have registered those trademarks as domain names for one or another purpose, often simple opportunism (i.e. in anticipation of future payment from the lawful trademark owner or in hopes of gaining profit from traffic through the registered site).

While trademark squatting has a history in the physical world, the practice seems to have become far more efficient in the digital world and must be effectively addressed. Nokia is a strong proponent of powerful protection for well-known trademarks in the Internet environment and we welcome the intent of the Anticybersquatting Consumer Protection Act to provide such protection. Well-known trademarks and lawful trademark owners should not suffer from cybersquatters seeking to damage a trademark's reputation, extract monetary compensation from the lawful trademark owner, or to otherwise profit from unauthorized registration of a trademark as a domain name. The anticybersquatting Consumer Protection Act is an important vehicle to address these problems, firmly in the spirit of last year's World Intellectual Property

Organization (WIPO) voluntary recommendation for the protection of well-known trademarks. Nokia is a strong supports of the WIPO recommendation -- which has been heralded as one of the most important developments in trademark protection this century -- and encourages its implementation by national legislatures and administrations.

Nokia also endorses the Anticybersquatting Consumer Protection Act's intent to reduce consumer fraud and public confusion as to the true source or sponsorship of products and services. The continued growth of the Internet and spread of electronic commerce are vital to U.S. and global economic growth and prosperity and heavily reliant on consumer confidence in this new medium.

Clearly, cybersquatting needs to be addressed. Nokia believes that the Anticybersquatting Consumer Protection Act is a timely step in the right direction. To the extent that there are disputes under this new regime -- i.e. between legitimate well-known and earlier, lesser-known trademarks, or even between two well-known trademarks -- we believe that such conflicts can and will be resolved through established dispute resolution practices.

Respectfully submitted,

Nokia, Inc.

By: 

William B. Plummer
Vice President
Government & Industry Affairs

Nokia Inc.
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Dated: April 19, 2000

To: Domain Name@Leg@OGC
From: S=Claudia.Cheek/C=US/A=INTERNET/DDA=ID/Claudia.Cheek(a)nokia.co
Cc:
Subject: Nokia's Anticybersquatting Comments
Attachment: nokiacomm.doc, MIME.MSG
Date: 4/20/00 1:35 PM

Hi Sabrina,

Thank you again for the follow up phone call to my information request.

I've provided our comments by way of both facsimile and attached electronic copy.

If you have any questions or comments please feel free to contact me at 202.887.0145.

Claudia cheek

<<nokiacomm.doc>>