



IPC COMMENTS ON “THE PROTECTION OF GEOGRAPHIC NAMES IN THE NEW GTLDS PROCESS”

INTRODUCTION

The Intellectual Property Constituency (“IPC”) welcomes the opportunity to provide its comments on the Governmental Advisory Committee (“GAC”) sub-working group’s Geographic Names Proposal (“Proposal”). The Proposal provides that “[g]eographic names should not be allowed to be registered as gTLDs, unless requested by the relevant communities where they belong or after a specific authorization given by the government or community to the applicant.” The proposed protection, as we understand it, would extend to any and all names that in any government’s view are of national interest, including names of “regions of countries, regions of continents, sub-regions of countries, rivers, mountains, among others.” The Proposal identifies the bases for this prohibition as “the principle of national sovereignty,” “sensitivity to national interest,” “public interest,” the “principle of freedom of use,” and international law as a general concept.

The IPC views the broad prohibition in the Proposal to be problematic for a number of reasons, most notably because: (1) it appears to be based on an inadvertent misunderstanding or mischaracterization of trademark law; and (2) it prioritizes vague and indefinite government interests over rights that are explicitly and unequivocally recognized in international law.

The IPC provided a summary of these comments during ICANN 51 in Los Angeles and submitted an executive summary of those comments to the GAC. The IPC has reviewed the Proposal and refined its comments to further inform the ICANN community’s discussion of this critical issue affecting *all* internet users.

SECTION ONE

THE PROPOSAL’S CONSENT REQUIREMENT AND ARTICULATED JUSTIFICATIONS FOR PROTECTION LACK A LEGAL BASIS.

Abstract

The main deficiency in the Proposal is the lack of balance among various interests and rights as found in the New gTLD Applicant Guidebook (“AGB”). Neither the GAC nor GAC member governments have an *absolute* right to object to any name which may have geographical significance without considering recognized legal rights under international law to these names. If a gTLD applicant has legitimate rights in the applied-for string, e.g., the geographic name is or is part of a valid trademark, and if the GAC or GAC member governments do not have any recognized legal rights in a geographic name to object, the ICANN Board should not accept the objection. Below, we review of the issues of (1) consent and (2) legal basis advanced by the Proposal.

Government consent requirement is inconsistent with GAC and GNSO prioritization of international law

The Proposal presumes that any geographic name gTLD requires the “consent” of the relevant government, citing the GAC Principles Regarding New gTLDs. This presumption conflicts with Article 2.3 of the GAC Principles, which makes a clear statement in support of prior third party rights, trademarks, and IGO names and acronyms. Moreover, the GNSO Policy Recommendations on New gTLDs (2008),

which the ICANN Board adopted in 2008, clearly state that strings must not infringe existing legal rights, including rights under the 1883 Paris Convention for the Protection of Industrial Property (the “Paris Convention”)¹ (specifically trademarks and trade names), the Universal Declaration of Human Rights (“UDHR”), and the International Covenant on Civil and Political Rights (“ICCPR”), and by implication other relevant international law. These frameworks call for observance and compliance with international law; GAC or GAC-member objection absent a *legal right* to support such an objection is inconsistent with these frameworks.

If a gTLD applicant can demonstrate and substantiate legitimate competing interests under national or international law, and the objecting GAC member(s) cannot itself demonstrate and substantiate recognizable legal rights in an alleged geographic name, the gTLD application must proceed. Mere sensibilities or concerns are not enough.

The principle of national sovereignty is irrelevant to use of geographic names in the DNS

Although international law provides sovereign states with certain rights to control their national boundaries, those rights end at national borders. International law does not provide a right to prevent another state or private party’s use of a particular name, a right to be referred to by a chosen name, or even a right to use a chosen name, outside of a state’s borders. The longstanding and ongoing dispute involving the chosen name of the country identified by the United Nations as the Former Yugoslav Republic of Macedonia² plainly demonstrate the state naming-related limitations on sovereignty. Moreover, sovereignty has no bearing on the use of sub-national and regional names and names of physical features such as a river or mountain outside of a state’s borders.

International law does not recognize “sensitivity to national interest” or “public interest” in relation to a state’s claim to rights in a particular geographic name. There is also no basis in international law for the Proposal’s purported “principle of freedom of use” for geographic names.

The longstanding recognition in international law of private rights in geographic names through the following mechanisms unambiguously disproves the exclusivity of government interests in geographic names:

- Trademarks including collective marks and certification marks and famous marks;
- Trade names; and
- Geographical Indications (“GIs”) and other source indicators.

TRADEMARK AND TRADE NAME RIGHTS

International law has required member states to protect trademarks since the Paris Convention.³ Most recently, the Trade-Related Aspects of International Property (TRIPS) Agreement, a World Trade Organization (WTO) agreement by which all WTO members are bound, incorporated the Paris Convention by reference.⁴ Many additional international and regional treaties, such as the Andean Community and Mercosur in South America, NAFTA in North America, Inter-American Convention, European Union Community Trademark, and others, also incorporate trademark protection.

¹ Paris Convention for the Protection of Industrial Property, Mar. 20, 1883, 828 U.N.T.S. 305.

² *Former Yugoslav Republic of Macedonia v. Greece*, I.C.J. Reports 2011, p. 644.

³ Paris Convention for the Protection of Industrial Property, Mar. 20, 1883, 828 U.N.T.S. 305.

⁴ 119 GAC member states—all but 13 current GAC member states—are members or observers of the WTO.

Trademark law recognizes governmental interests in geographic terms no differently than private parties' interests: all marks, irrespective of registrant, are required to satisfy established registration requirements. The scope of trademark rights varies from country to country, but many countries protect the right to *use* the trademark – not simply the right to *exclude* others, as the Proposal contends (quoting Professor Passa, who provides the European law perspective).

Article 6^{ter} of the Paris Convention part 1(b) makes clear that geographic names are not excluded from trademark registrability, and thus not subject to government consent requirements or exclusivity. No provision is made elsewhere in international law for the prioritization of government interests in geographic names over trademark rights.

The Paris Convention additionally recognizes, at Article 8, rights in the trade name of a commercial entity. Again, no distinction is made between governmental and non-governmental interests.

The recognition of private rights in trademarks and trade names contradicts any governmental claim of exclusivity in geographic names. Further, international law does not prioritize governmental interests in geographic names over trademarks or trade name rights.

GEOGRAPHICAL INDICATION ("GI") RIGHTS

The Paris Convention also recognizes geographic names denoting origin of products separate from the protection afforded trademarks. Multiple, separate international treaties, all of varying scope, protect such names – as geographical indications, indications of source and appellations of origin.

The principal global treaties that reference geographical indications are the Paris Convention; the Madrid Agreement for the Repression of False or Deceptive Indications of Source on Goods of 1891 (not to be confused with the Madrid Agreement on trademark registration); the Lisbon Agreement on the Protection of Appellations of Origin and Their Registration of 1958; and the WTO TRIPS Agreement of 1994. The TRIPS Agreement is the strongest of these because it mandates that WTO member countries amend their intellectual property laws to conform to the treaty.

Certain relevant regional treaties also exist which concern geographical indications, such as the various European Union directives, particularly concerning agricultural products and foodstuffs, and the 1992 North American Free Trade Agreement, Article 1712 of which addresses geographical indications.

The scope of protectable names varies across geographical indications, indications of source and appellations of origin, but as with trademarks and trade names, international law does not differentiate or prioritize governmental interests in these indications. The recognition of private rights in geographical indications serves to further contradict any governmental claim of exclusivity.

Conclusion

The balancing of competing, legitimate interests in geographic names is essential to ensure that the new gTLD system is consistent with international law. International law does not support general assertions that governments maintain the automatic right to exclude names from the DNS that may have geographical significance, or are geographical indications, indications of source or appellations of origin. Rather, international law recognizes private rights in geographic names; these rights must not be ignored in DNS policy in favor of government interests lacking support in international law. Accordingly, the Proposal should be rejected on that basis.

SECTION TWO

THE PROPOSAL INACCURATELY CHARACTERIZES GEOGRAPHIC NAMES.

The Proposal assumes that the TLD use of a name that also has a geographical meaning is inherently a misuse of that name and contrary to the public interest. The Proposal also assumes that it is “unavoidable that a geographic name will evoke the geographical site and its population”, and thus that this will inevitably lead to confusion of the public and consumers. However, the Proposal does not provide support for these assumptions which are inconsistent with the reality that names and naming conventions are perceived as part of their context and use. Consequently, the same name may have multiple legitimate uses and meanings, including:

- Multiple uses for the same name as a geographic term. For example:
 - Paris is a city in France, Illinois, Idaho, Texas and Tennessee;
 - There are more than 60 cities named “Berlin”;
 - Córdoba is the second largest city in Argentina, found in the Province of the same name, yet shares its name with a city in the Andalusian region of southern Spain (after which it was named by Spanish settlers). Córdoba is also, amongst other things: the name of three municipalities, one town and one department in Colombia; a city in Mexico; and three historical Islamic states.
- Other well-used and general meanings in addition to use as a geographical name. For example:
 - Córdoba is the currency of Nicaragua; a musical work by Isaac Albeniz; and a brand of guitar;
 - In the English language, China is both the name of a country and a word for tableware;
 - Turkey is the name, in English, of a country and of a large bird native to the Americas;
 - La Rioja is the name of an Argentine city in the province of the same name. It is also the name of a town in Spain, a Spanish wine region named after that town, and the name of the wine coming from that region together with parts of Navarre and the Basque province of Alava, which has a D.O.Ca. Qualified Designation of Origin.
- Geographic names share those names with other meanings, where the place may often be named descriptively for the other meaning. For example:
 - Bath is a city in the United Kingdom, named after the hot spring baths first built in the area by the Romans. Bath is also the name of two towns in Canada, one in the Netherlands, one in Jamaica and fourteen in the United States;
 - North American towns have the names: Boulder, Flint, Salida, Wheat, Silver, Granite; and
 - Beaulieu-sur-mer [literally *beautiful place on the sea*] is a village in the French Riviera. The name Beaulieu is additionally the name of numerous other towns and villages in France, Switzerland, Grenada and even the UK and US (reflecting French-language heritage).
- Many famous and well-established brand names, which are protected as registered trademarks, share their names with geographic terms. See Schedule 1 for non-exhaustive examples.

The context of the use and the personal knowledge and circumstances of a particular class of the public will influence how that portion of the public perceives a name and thus whether they are at any risk of being misled by it. For example:

- Use of the name “Everest” in connection with doors and windows in the United Kingdom is likely to designate to the public the British company that has used this name for 50 years as its company name and for its replacement windows and doors;
- Use of the name “Everest” for a restaurant is likely to designate to the public that the restaurant serves Nepalese cuisine and, possibly, that the restaurant owners are Nepalese by heritage;
- Even if the public thinks of Everest the mountain (also known in Nepal as “Sagarmāthā” and in Tibet as “Chomolungma”), the public is not likely to believe that the goods/services in the examples above originate from or are endorsed by the Himalayan region absent other language or indicators to that effect. Thus there is no *per se* public confusion and no “misuse” of “Everest” that is likely to result from use of that term as a TLD.

Even if one accepted the unsupported premise that geographic names “belong” to certain communities and should not be delegated as TLDs without “specific authorization given by the government or community to the applicant,” this proposition is unworkable because it does not acknowledge the jurisdictional limits on such national interests and the multiple co-existing uses of many names. From a practical perspective, how would a prospective gTLD applicant identify the multitude of users of a particular term as a geographic name, and which is the relevant “government or community”:

- Is it the first user of the geographical name? Or, do the views of all users of the geographic name carry equal weight, no matter their respective longevity and size of population or other distinguishing features?
- What if the name of a municipality is shared with a region? And what if the region spans national borders and perhaps is the subject of a territorial ownership dispute by two or more governments? It is almost inevitable that those governments would use the gTLD arena as a new platform for their dispute;
- Will the gTLD applicant be expected to pay for the right to use the gTLD? Even if it owns trademark rights in the name? Several countries have entered into commercial arrangements for their ccTLDs,⁵ which suggests that such a payment scheme is not far-fetched.

The AGB rightly acknowledges that competing claims to strings intended to be used as TLDs raise complex issues regarding the name at issue, the legitimate rights and interests of those potentially impacted by the use, or not, of the string as a TLD, and the need for a flexible but responsive dispute resolution process. Thus, the AGB blocks only a relatively small number of strings outright while leaving open the possibility for any other string to be blocked via Community Objections. The New gTLD Program demonstrates the welcome flexibility and responsiveness needed to address the potentially unlimited sets of facts likely to be raised in the next round of gTLD applications. Such a nuanced approach is more suitable to addressing competing interests fairly and proportionately than the Proposal’s default position of banning large numbers of strings even where there is no likelihood of

⁵ The Government of Tuvalu is reported to receive \$1million quarterly for the use of .tv, operated by Verisign. The ccTLD for Palau, .pw, is operated by Directi, rebranded as “Professional Web”.

harm, and no basis in national or international law to do so. Restrictions on gTLD applications should operate as a scalpel and not a sledgehammer.

SECTION THREE

THE PROPOSAL MISCHARACTERIZES TRADEMARK LAW.

Section 3 of the Proposal argues that gTLDs that may have a geographical significance “should be protected in the name of the public interest.” The Proposal elaborates that “allowing private companies to register geographic names as part of gTLDs [sic] strings creates a high risk for these names to be captured by companies that want to use them to reinforce their brand strategy or to profit from the meaning of these names, thereby limiting the possibility of utilizing them in the public interest of the affected communities.” This statement, however, mischaracterizes the purpose of trademark ownership, which also serves the public interest by preventing consumer confusion in the marketplace. Permitting trademark owners to obtain new gTLDs matching their trademarks facilitates this goal by providing a singular online space for the public to obtain goods and services of the trademark owner without fear of buying infringing goods or services – a risk that is particularly high in the online context.

Furthermore, the Proposal argues that “the request for identity between the geographic name and the one utilized in the string, allows room for confusion in the public and consumers, as it is unavoidable that a geographic name will evoke the related geographical site and its population.” But international and national law recognize the ability of any term, including terms that in certain contexts may have geographical significance, to serve as trademarks.⁶ For instance, Argentine law permits registration of a mark that comprises a geographic term so long as the term is not a national or foreign appellation of origin.⁷ Similarly, U.S. law permits registration of a mark that comprises a geographical term so long as the term is not deceptively misdescriptive of the actual place of origin of the goods or merely descriptive of the place of origin.⁸ Numerous jurisdictions globally present additional examples.⁹ Thus, international and national laws do not support the Proposal's assertion that “a geographic name will evoke the related geographical site and its population” – as in many contexts, this is simply not the case. Rather, international and national laws recognize that in many cases, the primary significance of a term is its

⁶ For example, Article 15 of TRIPS provides, “Any sign, or any combination of signs, capable of distinguishing the goods or services of one undertaking from those of other undertakings, shall be capable of constituting a trademark.” Such terms must be capable of indicating source of origin to the public, and must not cause confusion with other trademarks. A term may not possess significance as a *trademark* if it merely describes the geographical origin of the goods/services sold thereunder, and lacks any acquired distinctiveness. For example, RUSSIAN VODKA would be merely geographically descriptive of vodka produced in Russia, and would not be understood by consumers as a designation for a particular single source of such product (because there would likely be multiple producers of vodka in Russia). In the context of a trademark that may also have geographical significance, *confusion* would only arise if consumers are likely to believe that the trademark connotes a geographical origin that the goods and services sold thereunder do not actually possess. For example, RUSSIAN STANDARD as a trademark for vodka would be confusing or deceptive to consumers if the vodka actually originated in a place other than Russia.

⁷ See Law on Trademarks (Law No. 22,362), Official Gazette Jan. 2, 1981, arts. 1, 3 (translated from Spanish by WIPO) (Arg.).

⁸ See Trademark Act, 15 U.S.C. § 1052 (US).

⁹ For example, U.S. registrations exist for GREAT LAKES for a beer brewing company, GRAND CANYON for game tickets and game cards, and ROCKY MOUNTAIN for marshmallows. Argentine registrations exist for QUILMES for beer and LA SALTEÑA for food products. Community Trade Mark (EU) registrations exist for MANHATTAN for soaps and related cosmetic goods, FITZROY for property development and related services, and OUTBACK for multipurpose machines and automobiles and related repair services. All of these terms have geographical significance and also function as trademarks.

significance as a trademark and NOT its geographic significance.¹⁰ The Proposal does not appear to acknowledge that geographic terms can function as trademarks through inherent or acquired distinctiveness/secondary meaning, and that governments have not only agreed to protect such terms as trademarks under their national laws, but are required to do so under treaties such as the Paris Convention and TRIPS.¹¹

The very existence and recognition of trademark rights, particularly the recognition that terms that may have some geographical significance may also serve as trademarks, is inconsistent with the *a priori* superiority of government interests in geographic terms asserted in the Proposal. The policy for protecting trademark rights also serves government and public interest – to protect consumers from deception and confusion in the marketplace. This policy can best be maintained and policed by the interested and best-situated party – the trademark owner itself. Therefore, it is not accurate to conclude that trademarks should not or cannot serve the same public interest as a new gTLD, or that government interests should have priority over such private property rights simply because a trademark is a limited monopoly right.

Trademark protection confers the right to use the mark for certain goods and services as well as the right to exclude others from using confusingly similar marks in connection with related goods or services. However, trademarks are often used in connection with a wide variety of goods and services and are often protected in numerous countries. In fact, international law and treaties specifically recognize, and provide enhanced protection to, some trademarks in more than one country in the form of “well-known marks.”¹² On the other hand, geographic terms (with the exception of a handful of very well-known places) typically only receive recognition in the particular jurisdiction or region where the geographic place is located. The vast majority of geographic names are unknown outside of a particular jurisdiction.

There is no international legal basis for elevating protection of geographic place names above trademarks that may have a geographic connotation. The Proposal's implication that the commercial limits on trademark rights or the jurisdictional nature of trademarks should preclude them from becoming new gTLDs appears to ignore or mischaracterize the international legal framework promoting trademark rights and the commercial realities associated with trademark use. It is simply not accurate to conclude that trademarks should not or cannot serve the same public interest as a new gTLD, or that government interests should have priority over such private property rights simply because a trademark is a limited monopoly right.

Finally, the Proposal claims that “an enhanced procedure to protect geographic names should not upset global trademark norms.” If adopted, the Proposal would do exactly that by elevating government

¹⁰ This is especially true with more obscure geographic terms and references, which may only be coincidentally identical to a trademark.

¹¹ See, e.g., Paris Convention for the Protection of Industrial Property, art. 6quinquies(B) (“Trademarks covered by this Article may be neither denied registration nor invalidated except in the following cases: . . . when they are devoid of any distinctive character, or consist exclusively of signs or indications which may serve, in trade, to designate the kind, quality, quantity, intended purpose, value, place of origin, of the goods, or the time of production, or have become customary in the current language or in the bona fide and established practices of the trade of the country where protection is claimed . . .”); TRIPS, art. 15(1) (“Any sign, or any combination of signs, *capable of distinguishing the goods or services of one undertaking from those of other undertakings*, shall be capable of constituting a trademark. . . . Where signs are not inherently capable of distinguishing the relevant goods or services, Members may make registrability depend on *distinctiveness acquired through use*.”) (emphases added).

¹² See, e.g., Art. 16.3 TRIPS.

interests in geographic names above trademarks that also happen to be geographic terms. The Proposal would place the onus on a trademark owner who wishes to acquire a new gTLD matching its trademark to first ascertain whether its trademark may or may not be a potentially obscure geographic term as defined by any government or community in the world, and then seek the permission of that government or community, with no guarantee of cooperation or success, all before applying for the new gTLD. There is no legal basis for such a requirement.

SECTION FOUR

THE PROPOSAL'S INCLUSION OF REGIONAL LANGUAGE, PEOPLE DESCRIPTIONS, AND OTHER SIGNIFICANT TERMS IS OVERBROAD.

Another concerning aspect of the Proposal is the inclusion of terms in Section 2.2.1.4 of the AGB that are not even geographic terms, but rather are “**regional language or people descriptions.**” To support their inclusion, the Proposal again appears to rely on the 2007 GAC Principles, suggesting that “terms with national, cultural [and]... religious significance” could be excluded as potential new gTLD strings - despite having meanings that do not have national, cultural or religious significance. Including these broad categories of terms creates a slippery slope that further undermines international legal principles and could result in unjustified exclusion of potential gTLDs that could deliver value to the community in future rounds. We address each in turn below.

Regional Language. The following hypothetical application for a .ENGLISH gTLD demonstrates the unforeseen and wide-ranging implications of such a requirement. It could prohibit the establishment of a .ENGLISH gTLD unless the applicant obtained the permission of all governments whose populations contain English speakers. Even if the scope were narrowed to include only those governments where a significant fraction of the population spoke English, such governments would include at least:

Antigua and Barbuda	Australia	Bahamas	Belize
Cameroon	Canada	Channel Islands	Ghana
Jamaica	Kenya	New Zealand	Republic of Ireland
Singapore	South Africa	Trinidad & Tobago	United Kingdom
United States of America			

When one adds to this list all 50 of the United States, the District of Columbia, Guam, each of the Canadian Provinces, Wales, Scotland, Northern Ireland, each of the Australian provinces, each city, county and township within each State, Province or Territory, the herculean scale of the task of pre-approval effectively precludes any successful application for a .ENGLISH gTLD.

People Descriptions. Similarly, ICANN's adoption and implementation of this requirement could prohibit the applications for thousands of otherwise lawful gTLD strings. While perhaps meant to include nationalities, such as APACHE, SERB, or ZULU, it could easily be read to include any people-describing adjective.

Nationally Significant Terms. This aspect of the Proposal could eliminate from the pool of potential gTLD strings thousands of nouns with daily uses as well as national significance. For example, it would exclude an application for a .EAGLE gTLD without obtaining approval from every government whose flags depict an eagle. Wikipedia lists approximately 200 different flags containing eagles. See http://commons.wikimedia.org/wiki/Category:Flags_with_eagles. The requirements to identify, contact, and obtain approval from such a broad array of governments to use a bird name as a gTLD would result in no applicant applying for it. This aspect seems likely to have a chilling effect on applications related to any number of words that may have a “national significance” but also have uses and meanings far beyond.

Culturally Significant Terms. Like the other categories, this requirement encompasses such an enormous spectrum of terms potentially subject to government pre-approval that the net result will be to eliminate them from any future rounds of new gTLDs. For example, .ROCK would not be permitted because rock is a form of music invented within the United States that has been accepted on nearly every continent. Because “rock” is a culturally significant term, not even a well-established geological society could apply for the .ROCK gTLD without seeking permission from hundreds of governments globally. This category seems likely to have the unintended (and unfortunate) effect of eliminating as future gTLDs terms which could be used by organizations to build scientific, cultural, and artistic information communities online via specialized registries.

Religiously Significant Terms. This category appears rife with peril. In the United States alone, the clear separation between Church and State, which serves as a founding principle of its representative democracy, essentially prohibits this requirement. Many other governments globally have similar prohibitions against interfering with the free exercise of religious rights. In addition, this category of “religiously significant terms” would encompass not only the names of major world religions but other religiously significant terms such as .WATER, .CROSS, .CRESCENT, .TEMPLE, and .OFFERING. Having to seek permission from all relevant governments would have the practical result in precluding any future gTLDs consisting of any term which is arguably religious in nature.

CONCLUSION

The IPC appreciates this opportunity to provide its input on the Proposal, and urges members of the GAC to seriously reconsider the approach they recommend therein.

SCHEDULE ONE

NON-EXHAUSTIVE LIST OF FAMOUS BRAND NAMES THAT ARE ALSO GEOGRAPHIC NAMES

DRAMBUIE –liqueur
KENT - cigarettes
BOURNVILLE - chocolate
IBIZA – clothing, leather goods
DARTINGTON - glass
OLYMPUS - camera
PICCADILLY - watches
WATERFORD - crystal
CASABLANCA – computing, cigarettes, fans, food products – all owned by unrelated companies
TOLEDO – watches; flooring; tobacco products and services– all owned by unrelated companies
EMIRATES – airline
SANTANDER – bank
CARIBBEAN – binoculars and sports scopes
PERITO MORENO – beers and alcoholic drinks
MENDOZA –snack foods
BARILOCHE – food products; fungicides; jewellery – all owned by unrelated companies
BUXTON - water
YELLOWSTONE – scaffolding
TEXAS – clothing; semiconductors - owned by unrelated companies
ANGLIA - windows
PERRIER - water
EVIAN – water
SANTIAGO –scientific instruments
MONTEVIDEO – sound recordings
MEISSEN – china products
AVON - cosmetics
STANLAKE PARK –wines
RUSCOMBE –wine
TY NANT – bottled water
MONTE CARLO – cookies
ANGUS – steak houses
VICHY- cosmetics (and water)
TUAREG - Car
CORTINA - Car
GRANADA - car
USHUAIA - showers
FUJI – photographic film
BRISTOL – planes and cars