



4 March 2013

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Associate Administrator
Office of International Affairs
National Telecommunications and Information Administration
1401 Constitution Avenue NW
Room 4701,
Washington, DC 20230

Subject: Country Code Top-Level Domain (ccTLD) for the United States; Policies and Requirements; Comments Request

Docket Number: 130124072–3072–01

Overview

Please accept the following comments in response to the National Telecommunications & Information Administration's (NTIA) request for feedback on policies and management of the .US Top Level Domain (usTLD). As the world's largest domain registrar, we appreciate the opportunity to contribute recommendations toward the shared goal of making .US a safe and trusted name space on the Internet. To the end, we offer specific policy suggestions involving kids.us, online identity and the potential creation of an .US policy council.

Policy and Practices Recommendations

(Notice of Inquiry, RFC Issues 1 and 2)

Currently, eligibility to register an .US domain name requires registrants to comply with the usTLD Nexus Requirements Policy¹. While we support the purpose of the nexus requirements, we believe that they are overly complex and restrictive. We suggest that usTLD consider simplifying the requirement to a single nexus category that is established by a valid U.S postal address. To guard against abuse, the registry and .US registrars could expand nexus spot checks.

Through feedback received by governments and other community stakeholders, the Internet Corporation for Assigned Names and Numbers (ICANN) is pursuing an accreditation program for proxy/privacy services. Once this is complete, we encourage usTLD modify its own policies to recognize the ICANN program, and allow the use of accredited providers in the .US name space.

Finally, other registries have adopted a popular service that allows registrants to choose a single renewal date for multiple registrations. Partial-year renewals are supported to synchronize all expiration dates. We recommend usTLD consider adopting an equivalent service for .US registrations.

1. <http://www.neustar.us/the-ustld-nexus-requirements/>

KIDS.US

(Notice of Inquiry, RFC Issue 7)

The registry's intentions for KIDS.US were admirable, however KIDS.US failed to achieve critical mass and public awareness. We suggest phasing out this effort. Existing sites can continue to be maintained, so long as this does not create unreasonable costs. But any resources or funding dedicated to promoting KIDS.US should be reallocated to the promotion of the .US TLD in general.

Policy Council

(Notice of Inquiry, RFC Issue 3)

To ensure that usTLD policies are responsive to an ever-changing industry and technological landscape, we encourage usTLD to consider creating a Policy Council. This group would advise usTLD on the management of .US, collecting feedback from commercial, nonprofit and public sectors, and ensuring this is reflected in usTLD policy. The group would be comprised of volunteers who are recognized experts in fields that are essential to the mission of .US.

Trusted Identity

(Notice of Inquiry, RFC Issue 1)

Finally although not part of your original request for comments, we have one additional suggestion that could foster innovation in the .US TLD. As a provider of online ecommerce platforms for individuals and small businesses, GoDaddy.com recognizes the challenges associated with verifying online identity and thwarting fraud and identity theft. We are encouraged by the early efforts of the National Strategy for Trusted Identities in Cyberspace (NSTIC), and urge usTLD to coordinate with participants in the Identity Ecosystem Steering Group (IDESG) pilot programs for providing trusted identity credentials for internet users. Working together, the .US TLD could become an incubator for IDESG efforts prior to expanding them to other TLDs.

Conclusion

We appreciate the opportunity to share our recommendations prior to the renewal of the usTLD contract, and will welcome further discussions or any follow up questions you might have. We look forward to working with you on these issues.

Thank you,

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