



To: Suzanne R. Sene
Office of International Affairs
National Telecommunications and Information Administration
1401 Constitution Avenue, N.W. Room 4701
Washington DC 20230
USA

Brussels, February 12, 2008

Dear Madam,

CENTR, the Council of European National Top Level Domain Registries welcomes the opportunity to respond to the NTIA Notice of Inquiry under the Midterm Review of the Joint Project Agreement between the Department of Commerce and ICANN.

We take this opportunity to highlight some pending issues which are of high importance to our community and we look forward to contributing to dialogue within the ICANN framework to facilitate ICANN's ongoing evolution.

CENTR believes that the NTIA's initiative in calling its Notice of Inquiry is well-timed. With 18 months left to run of the JPA, continuing multi-stakeholder dialogue is needed, for example through the NoI and within the ICANN process, in order to arrive at a shared vision of what a post-transition ICANN would entail, as well as how and when transition will be triggered.

It is now well understood that ICANN's role with respect to ccTLDs is limited. Nevertheless, CENTR and its members have experienced improvement in areas that are relevant to ccTLDs. Transparency has improved to levels that can be expected of a professional organization. CENTR anticipates that ICANN will continue this positive trend in the coming months and years.

As the IANA function is of utmost importance to the functioning of the Internet, CENTR has always paid keen attention to its management. We're pleased to see progress and professionalisation of IANA. IANA staff is capable and trusted by the ccTLD community. On several occasions in the past we have provided input at procedural and operational level. While some of these suggestions for improvement have been taken into account others, among which the eIANA automation project, remain to be fully implemented. CENTR looks forward to continuing its close dialogue with the IANA and to contributing to further improvements, such as greater streamlining of the process to change name servers.

Another key issue for many CENTR members is the implementation of Internalized Domain Names (IDNs) in the root.

The implementation of Internationalised Domain Names in the root is of primary importance to a number of ccTLD managers worldwide, and to many CENTR members. CENTR has contributed to the international debate on how to implement IDNs in a way that balances speed with the need to maintain the stability and security of the Internet.

We applaud ICANN's initiative to set up a public test-bed in 11 non-Roman alphabet/language systems. A related development illustrates the maturing relationship between ICANN and the regional ccTLD organizations: the ICANN Board decision to set up a working group (IDNC) to investigate the possibility of placing a limited number of non-contentious IDN ccTLDs in the root

before comprehensive guidelines for IDN ccTLDs as a whole are developed. This decision followed a proposal from APTLD and CENTR.



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Like many other commentators, CENTR is keen to see the implementation of IDN ccTLDs in the root by the end of 2008, and our members are committed to working within the ICANN community to resolve the outstanding policy issues.

Under the Joint Project Agreement, ICANN committed to improve several processes and procedures. Particularly in the area of transparency, ICANN has made positive progress in improving communication. However, information concerning the ICANN meetings could be further streamlined and made available in a more timely manner. Providing fuller details of the agenda and meeting arrangements further in advance of the meetings themselves would no doubt increase attendance of the Internet Community at ICANN meetings.

It is still extremely hard for small or medium ccTLDs to follow how ICANN works. In this field, we believe that the regional ccTLD organizations can contribute by facilitating two-way dialogue and information sharing. The complementarities and synergies between ICANN and the Regional ccTLD organizations (AfTLD, APTLD, CENTR and LACTLD) should be further explored.

There have been genuine efforts to make ccNSO more open and inclusive. CENTR encourages this process and offers its full support in reaching the new goals of broader participation in the ccNSO within its limited scope but believes that neither ICANN nor the ccTLD community could benefit from duplication or overlapping activities and goals already developed at regional level. The ccNSO is a supporting organization to the ICANN Board and should focus on its well defined mandate as provided through the ICANN bylaws.

We underline that ICANN's mission is and should remain within its limited scope as defined in its Bylaws. Extension beyond the Mission Statement in Article 1, Section 1 of the ICANN bylaws, could lead to conflicts with local internet community's interests and autonomy and undermine the renewed trust that was created through the improved organizational processes, increased transparency and the accountability frameworks.

Conclusion:

- CENTR and its members are positive about the improvements that have taken place in ICANN in the last two years.
- The introduction of IDN ccTLDs and the completion of the eIANA automation project are priorities in the view of CENTR and its Members.
- With 18 months to go, this is the right time to start discussing the post JPA era. The multistakeholder model should be the foundation for this discussion. At least part of the discussion should be held within ICANN. CENTR and the other Regional Organisations are looking forward to contributing to this debate.

Kind regards,

A handwritten signature in blue ink, appearing to read 'P. Van Roste'.

Peter Van Roste
General Manager CENTR

