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Date 5th of June 2009
Subject Request for Comment on the Transition of the Technical
Coordination and Management of the DNS

Reference

Your reference

Our reference 2009028

Attachment

Dear Ms. Alexander,

SIDN is the registry for the .nl country-code top level domain, which, with close to 3.5 million registered domains, is one of the world's largest and most successful ccTLDs.

SIDN views the internet as *the* medium for the globe's citizens to communicate, exchange information, socialize, work together and do business and as a crucial driver for personal and economic development and democracy. We therefore consider it our responsibility to contribute to maintaining and further developing the internet as a single, interoperable global medium, diverse, open and accessible to all.

We believe that the original principles of stability, interoperability, competition and private bottom-up coordination continue remain of prime importance in light of the developments such as the advance in Internet technology, the expanded global reach of the Internet, and the international dialogue, including the discussions within the Internet Governance Forum. We further believe in an internet that is managed by the private sector and that is co-ordinated, not controlled.

Accountability and legitimacy of ICANN has over the years been a key topic for many. SIDN considers ICANN's role and responsibility as a mainly technical one: providing technical-coordination functions for the management of the system of unique identifiers of the global Internet, including the Domain Name System (DNS). As such, (governance of) ICANN's contribution is only a small part of (the governance of) the internet as a global medium.

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However, Internet users rely on the efficient and flawless functioning of the root database and for registries the IANA function performed by ICANN is of prime importance.

As one of the founding members of the ccNSO, SIDN has been closely collaborating with ICANN since its creation with the objective to assure availability, accessibility, security, overall quality and further development of the Internet in general and the .nl name-space in particular.

SIDN has submitted input to the NTIA's previous Notices of Inquiry on the Transition of the Technical Coordination and Management of the DNS, released in May 2006 and November 2007, and participated in the public meeting held in Washington on February 2008.

As the Chief Executive of SIDN, I welcome the opportunity for stakeholders to give input to this process once again, you will find our contribution to be both consistent with earlier submissions as well as responsive to recent developments.

As on previous occasions, SIDN does not aim to individually address the questions raised in the Request for Comment published by the NTIA with this submission.

Compared to global challenges as security, openness, diversity and bridging the digital divide, the oversight of ICANN and the IANA function by the US does not seem a major issue, more so since the US has fulfilled this role effectively and honourably.

However, this unilateral supervision does not fit the global nature and dependency of the internet and will need to change. SIDN strongly supports ICANN's full transition to the private sector.

The present oversight by the US should thereby be replaced by a governance model that ascertains on one hand that accountability is guaranteed, capture is prevented and the possibility of objection, appeal and in the extreme; intervention is assured. On the other hand, it should assure that multi-stakeholder processes do not further politicise an essentially technical function, slow down innovation or lead to increased bureaucracy and costs.

With diverse activities, ICANN has further contributed to the security and stability of the DNS, while the independent assessment of ICANN by One World Trust proves that measures to improve the multi-stakeholder model, participation and ICANN's transparency and accountability have their results.

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However, while the end of the JPA approaches, no significant progress has been made in developing an adequate post-JPA governance model incorporating the safeguards described above. The necessity of such a model is illustrated by the challenges that ICANN, in the new gTLD process, noticeably faces to remain independent, objective, transparent and responsive.

Considering the complex projects that ICANN and the community face presently and will face in the near future, it is SIDN's opinion, that such a new governance model should be developed, implemented and working effectively before ICANN's full transition to the private sector.

In line with previous submissions, I suggest that the US continues its leading role by developing and implementing with ICANN, its Supporting Organizations and Advisory Committees and within the existing ICANN process, such a governance model, after which full transition can be realized.

Yours sincerely,



Roelof Meijer
CEO SIDN