



June 8, 2009

Attn: Fiona Alexander,

Associate Administrator,
Office of International Affairs,
National Telecommunications and Information Administration,
U.S. Department of Commerce,

1401 Constitution Avenue, N.W., Room 4701,
Washington, DC 20230

Subject: Our comments on DNS Transition

Ms. Fiona Alexander,

We are pleased to send our comment.

Best Regards,

Jun Murai

Director and Chair of Board
WIDE Project
5322 Endo, Fujisawa,
Kanagawa 252-8520 Japan
Tel: +81-466-49-3529
Fax: +81-466-49-1101
junsec@sfc.wide.ad.jp

June 7, 2009

Fiona Alexander,
Associate Administrator,
Office of International Affairs, National Telecommunications and Information Administration,
U.S. Department of Commerce,
1401 Constitution Avenue, N.W., Room 4701,
Washington, DC 20230

Assessment of the Transition of the Technical Coordination and Management of the Internet's Domain Name and Addressing System

Foreword

WIDE Project, which is a pioneer of the Internet development in Japan and was established in 1988 as a consortium for conducting broader activities in academia and industries on research and development for the Internet technology and its operation, would like to express gratitude to the Department of Commerce (DOC) and National Telecommunications and Information Administration (NTIA) for the opportunity to comment on "Notice of Inquiry Docket Number 090420688-9689-01" issued on April 24, 2009. The WIDE project offers the following comments in response to the NOI.

Our Comments

In order to make this comment both valuable and clear for any readers, following our brief introduction on what the WIDE project has been working with the ICANN, we state the comments as a response to the NOI.

The WIDE project has been working on development the Internet mainly in Japan since its creation in 1988. The project has been working on stable and trustful DNS operation for both Japan and global infrastructure since 1991. In mid 1990's, the project was working very hard on establishment of Japanese LIR called Japan Network Information Center (JPNIC) and Japan Registry Service (JPRS), and jointly made with our colleagues to launch our RIR called Asia & Pacific Network Information Center (APNIC). The WIDE Project has been operating "M" DNS root server in Japan since 1997, as the first non-US organization added to the DNS root server operators. Currently, the project is in charge of operation of "M" DNS root server and part of the root server operation of ".jp" ccTLD. Through our activities, the project had many opportunities

of working with the ICANN so far. Especially the project as one of DNS root server operators could have collaborations with ICANN.

At this opportunity to state our comment as a response to the NOI, the WIDE project clearly emphasizes importance on the following three ideas:

1. The ICANN is the one legitimate body for managing proper, robust, sustainable and trustful framework of DNS infrastructure by open participation among stakeholders of the rapidly growing Internet in practice.
2. The role and responsibility of the ICANN as of today, should not be replaced by other unproved means after the JPA conclusion.
3. The services and operations that the ICANN provides today should be kept after the JPA conclusion.

In the decade the ICANN has been served since its foundation, the Internet environment has been growing very rapidly. By the result of the growth, the Internet has been reaching, also very rapidly, to the “full coverage” over both of the human activities and the geographical locations. Consequently, it has been more and more important, since the beginning of the ICANN’s foundation, to manage the global governance in the way all the stakeholders participating and the operational stability and security at the same time.

The WIDE project prides ourselves on being one of the DNS root operators and highly honored to participate on the ICANN process for global operation of the Internet. By the experiences with the ICANN process, the WIDE project respects the success of the ICANN in the last decade of operation as a private sector organization that is independent from any national government.

During the rapid proliferation of the Internet in the last decade of the ICANN process, the interests on the Internet from a point of view of the each stakeholder have been stronger. All of the participants of the ICANN process, such as Individuals, operational entities, and national governments have their own broader missions for stable, sustainable, secure, and expandable operation of the Internet.

As a deliverables from discussions among various stakeholders participated in the ICANN establishment and designing its operations, there were four principles, which are widely accepted by those stakeholders, on the global Internet governance: 1) maintaining “stability” for sustainability of its role on operation of the Internet, 2) keeping “competition” for economic rationality and fairness, 3) being “private” not for depending on any national government, and 4) democratic “bottom up” structure for its decision making process. The WIDE Project believes that those original four principles (stability, competition, private and bottom up) are highly appropriate still for the Internet operations of the next decade.

If it is appropriate here to point areas for improvement of ICANN operation, two areas can be listed: 1) improving accuracy of its governance by considering the new area of stakeholders because of the expanding responsibility of the Internet environment, and 2) enhancing mechanism and process to promote and to encourage the rational security operation of the Internet infrastructure. The WIDE project concerns security discussions of the Internet tend to be non-technical and emotional. The ICANN should take proper actions for the strong mechanism to collect the wisdom on the Internet security.

The WIDE project appreciates and supports the role of the ICANN; the ICANN framework with its accumulated experiences and good practices of the last decade of the ICANN process should be carried out even after conclusion of JPA.

Jun Murai,
Director and Chair of Board,
WIDE Project, Japan