

To Ms. Fiona Alexander
Office of International Affairs
National Telecommunications and
Information Authority
1401 Constitution Avenue, N.W.
Room 4701
Washington, DC 20230
UNITED STATES OF AMERICA

Brussels, June 8th 2009

Concerns: **CENTR Position in response to the Nol issued by the NTIA on April 4th 2009.**

Dear Ms. Alexander,

CENTR welcomes the opportunity to reply to the Notice of Inquiry, issued by the National Telecommunications and Information Authority on April 4th 2009, Docket No. 090420688-9689-01. In our contribution we have not addressed the individual questions, but share our general views on the topics raised in the Notice of Inquiry.

While for ccTLDs the most crucial function– the efficient performance of IANA - is unaffected by the pending termination of the Joint Project Agreement, we believe that the questions raised in the Nol are important, in particular as the IANA function is performed by ICANN. IANA should continue to be administered in an unbiased and non-political manner and we look forward to the implementation of the e-IANA, the automated process for updating Root Zone data.

CENTR wants to congratulate both the United States Government and ICANN with the improvements in the functioning of ICANN to date. We believe that a significant part of these improvements was triggered by the JPA.

We are however concerned that while significant work has been done within ICANN on increased transparency and accountability, there has not been enough progress made on the development of a post-JPA governance arrangement. This arrangement should take into account the principles put down in the Green and White Papers by the Clinton administration and facilitate international participation in the coordination of the DNS.

CENTR confirms its strong belief in a global Internet, open to everyone. An Internet that is coordinated but not controlled. The model should embrace the four principles of



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stability, competition, private, bottom-up coordination and representation. The post-JPA governance arrangement should also include checks and balances that assure an efficient form of control over ICANN's decisions by the Internet Community.

While the other principles of competition; private, bottom-up coordination and representation are no less fundamental than ever, the stability and security of the DNS must take precedence. Consequently, CENTR recommends that before full transition to the private sector is completed, appropriate arrangements be put in place with a limited scope and for a short period so that ICANN may make further progress in a number of areas directly pertaining to stability and security of the DNS such as IPv6, DNSSEC and new TLDs.

Today, there is much coordination to be undertaken as the Community is tasked with designing an expedited process for Internationalised Domain Names that accommodate scripts other than ASCII. In addition there is scope for further progress in promoting the adoption of IPv6 and the implementation of DNS Security Extensions.

After expiration of the JPA, ICANN's role and responsibility should remain a technical one: providing technical coordination functions for the management of the Internet naming and numbering, including DNS.

The first place to discuss the way forward would be within the ICANN community, but the progress of such a debate should be shared with a much larger group of stakeholders that are typically not represented at ICANN meetings or mailing lists. The Internet Governance Forum, among others, could provide a platform to improve communication to a wider community.

CENTR remains strongly committed to contribute to these discussions in a constructive manner and spread awareness on these important issues amongst ccTLDs.

About CENTR

CENTR, the Council of European National Top Level Domain Registries, is the world's largest of Internet domain name registries. CENTR has over 50 members which account for over 85% of the country code domain name registrations worldwide. Each CENTR Full Member operates a country code top level domain. In this capacity they play a pivotal role in the stability of the Domain Name System and the Internet.

Yours Faithfully



Peter Van Roste
General Manager



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