

Island Networks welcomes the opportunity to respond to the NTIA's request for input. Island Networks is the registry for the Bailiwicks of Guernsey and Jersey (the .GG and .JE Top Level Domains). Island Networks has been closely involved in the ICANN framework since its earliest days.

GG and JE were two of only a small number of Internet codes for countries and territories allocated by USC-ISI not taken from ISO-3166-1. (We were pleased to note that the International Standards Organisation subsequently saw it appropriate to utilise these codes when adding Guernsey and Jersey to the main ISO-3166-1 list in mid-2006.) The Islands celebrate the tenth anniversary of the founding of the GG/JE Domain Registry in August 2006.

Island Networks' Response to NTIA

We submit that the original principles of the White Paper remain relevant today.

What we see as most important is that the framework created to fulfil those objectives closely follows those original principles in reality, and that there are checks and balances in the system (such as a separation of powers) to ensure it enjoys maximum legitimacy and achieves broad support from the community.

ICANN's progress has been slow, and at times frustrating to those of us participating in the forum. It has made some measurable progress, principally in the gTLD space. Island Networks hopes to see such progress continue in that area. We expect to see ICANN to have a genuine desire (and to exhibit commensurate effort matching such desire) fully to engage with, and respect, the diversity and local accountability that is the ccTLD world.

In particular, whilst those parties from outside the United States (including ccTLD managers) who do participate in ICANN do so enthusiastically and bring great skill and knowledge to the table, the lack of participation from other countries, (especially developing countries and countries with a diversity of view towards how the DNS should be co-ordinated) appears to impact upon ICANN's ability fully to achieve the White Paper goals.

Fully supporting the White paper principles, at this time, Island Networks believes that continued work and extra effort by ICANN is needed before transition is advisable or possible.

We support the view that changes of ccTLD manager¹ must necessarily be a local issue in accordance with the laws of the country or territory in which the registry is established and look forward to a return by the IANA to the service levels received by TLD managers under the InterNIC system pre-1998, when a routine change of TLD nameserver could be carried out in 24-48 hours.

Alderney, Bailiwick of Guernsey, 4th July 2006

¹ NB: Given the multiple meanings and ambiguity of the word 'relegation' -- often been mis-used to mean 'change of manager' in addition to its original use as a term of art describing the technical process of inserting NS records in a DNS zone, it is now preferable for clarity to employ the expressions 'change of manager' for the first meaning and 'change of nameserver' for the latter.