8ᵗʰ June 2009

Ms. Fiona M. Alexander

Office of International Affairs

National Telecommunications and

Information Administration

U.S. Department of Commerce

1401 Constitution Avenue, N.W.

Room 4701, Washington, DC 20230

United States of America

Re: Docket No. 090420688-9689-01

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

Dear Ms. Alexander,

We, JPRS (Japan Registry Services Co., Ltd.), are one of the ccTLD sponsoring organizations that formalized relationship with ICANN at its earliest stage, through conclusion of the ccTLD sponsorship agreement.   JPRS has supported coordination of Internet resource management led by private sector centering on ICANN, thus has actively participated in and contributed to the ICANN process.

We submit the following comments responding to your Notice of Inquiry:

- ICANN has promoted technical coordination of the Internet's resources on the basis of multi-stakeholder participation and contributed to realizing security and stability of the DNS.   Overall, ICANN has achieved a satisfactory level of performance.

- For instance, as for the formalization of the relationship between ICANN and ccTLD, a new framework based on mutual trust, called Accountability Framework, was introduced by ICANN in 2006.   Since the introduction, the formalization has been steadily advanced. As of June 1, 2009, as many as 66 ccTLD's, including 50 who executed the Accountability Framework, have established formal relationship with ICANN.

- With regard to IDN ccTLD, discussion has been accelerated to a very high level in the past two years, accompanied by concrete actions toward implementation.   We can now

expect to see the selection of IDN ccTLD starts within 6 months or so at the earliest.   This acceleration is the evidence of the fact that ICANN has proactively taken in what community demands, and complex issues have been addressed by ICANN's efforts through participation of multiple stakeholders, including organizations and individuals worldwide.

- In terms of root server administration, ICANN has already carried forward the formalization of relationship with 4 out of 12 operators except for ICANN itself, and the progress in stabilization of entire root server system has been observed.

- JPRS continues to support private-sector coordination of Internet resources and agree to the transition of DNS management responsibility into private hands.   The transition should be carefully carried out, so that the transfer does not damage continuity of the DNS stability and IANA function.

Sincerely yours,

Koki Higashida
President
Japan Registry Services Co., Ltd.