

From: MARUYAMA Naomasa <maruyama@nic.ad.jp>
To: <DNSTransition@ntia.doc.gov>
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Subject: Our comment on DNS Transition

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

Comment in response to the notice of inquiry "Assessment of the
Transition of the Technical Coordination and Management of the
Internet's Domain Name and Addressing System"
[Docket No. 090420688-9689-01]

8 June 2009

Thank you for providing us with the opportunity to submit our
comment on a very important issue for the Internet. As a member of
the Internet Community, we have long been supporting the concept of
private sector approach for the technical coordination and management
of the Internet DNS. In a word, we understand ICANN as the only
competent entity, at the moment, to fulfill this role, hence we
sincerely hope that the US government will eventually transit the role
to ICANN upon its full corporate maturity. In the following, we
explain some of our thought backing this idea, instead of responding
to individual questions posed in the docket.

(a) Stability, competition, private sector bottom-up coordination and
representation of all Internet stakeholders with their diverse
interests are vital principles for the development of the Internet.

(b) Evolution of the Internet heavily depends on the single
authoritative root DNS zone maintained so far by private sector
initiative. ICANN has been playing key role in assuring uniqueness of
the root zone since its foundation.

(c) Relation between ICANN and root server operators caused no problem
on management of the root zone since its foundation.

(d) ICANN has a mechanism to facilitate dialogue with governments.

These are some of our thinkings, and we hope that the US government
will take these points into account in making decision about the JPA.

Respectfully submitted,

Naomasa Maruyama
On behalf of the Board of Trustees, Japan Network Information Center
(JPNIC)

(Mr.) NaOMASA Maruyama

Japan Network Information Center(JPNIC)