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To: <DNSTransition@ntia.doc.gov>
Date: Mon, Jun 8, 2009 10:38 PM
Subject: DNS Transition Comments

Attention NTIA Staff:

Since its creation ICANN has existed under the oversight of the U.S. Department of Commerce. This oversight is set to expire in September of this year. Throughout this relationship it was assumed ICANN would completely transition to the private sector once certain conditions were met. The U.S. initiated this public-private partnership in order to bring investment and expansion to the Internet. Ten years later the Internet is large, diverse and robust but it is not secure. Completely removing government oversight will make security and accountability even weaker.

America has been criticized for keeping a tight hold on the Internet, but this is not the complete story. The U.K., The Netherlands, Sweden, and Japan all control root zones. ccTLDs flourish. Each country controls the destiny of its own network. The U.S. does not have a total monopoly on the Internet as sometimes suggested. Frequently, the critics of U.S. management are governments that have questionable human rights, free speech, and free press records and as such are threatened by the free flow of information.

The following quote is from the original MOU:

"The U.S. Government believes that it would be irresponsible to withdraw from its existing management role without taking steps to ensure the stability of the Internet during its transition to private sector management"

This statement could be interpreted in many ways, but can we truly say that it is stable after all the problems we've seen?

There are many arguments for and against this and in my opinion the Internet is not yet ready to be transitioned to private or international management. To be clear, I am not against the idea of cooperative international management eventually. However, KnujOn has spent six years analyzing the policy structure of the Internet and our general findings suggest the compliance and enforcement portion is not nearly robust or effective enough. Furthermore, there are serious concerns about DNS security that remain unresolved.

I believe it is unrealistic to assume the Internet will be administered by the U.S. forever, but we are encouraging a more concrete transition plan that occurs after significant security improvements to DNS and more public accountability of the Registrars. A multi-state administration of ICANN would be a better next step than total private sector transition. The Joint Project Agreement (JPA) should be extended for at least another year until a security and accountability plan is developed and fully tested.

Sincerely,

Garth Bruen
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