15 February 2008

To: Office of International Affairs
National Telecommunications and Information Administration
Ms. Suzanne R. Sene
1401 Constitution Avenue / Room 4701
Washington DC 20230, USA

Subject: The Continued Transition of the Technical Coordination and
Management of the Internet's Domain Name and Addressing System:
Midterm Review of the Joint Project Agreement

Dear Ms Sene,

JPRS appreciates the US Government for offering this opportunity for
comments on the transition of the coordination and management of the
DNS.

We, JPRS (Japan Registry Services Co., Ltd.), are one of the ccTLD
Sponsoring Organizations that formalized the relationship with ICANN
in its earliest days. Since its inception, JPRS has supported
private-sector-led Internet governance, thus contributed to organize
ICANN and participated in discussions of various issues surrounding
the management of the DNS. This contribution has been made based on a
notion that JPRS, as well as the other community members, forms part
of ICANN.

JPRS gives the following comments responding to your Notice of
Inquiry:

- ICANN has promoted management of the Internet's technical resources
 on a multi-stakeholder coordination basis and contributed to
 realizing security and stability of the DNS. All in all, we view
 ICANN has achieved a satisfactory level of performance.

- Especially, we value a series of steps taken by ICANN to protect
 gTLD registrants including Registry Failover Planning, Registrar
 Data Escrow and RAA amendments; as these measures strengthen
 consumer protection as well as security and stability of the DNS.
 We also value ICANN's processes where the inputs made by JPRS and
 other parties such as ccTLD registries, who have similar
 experiences, were well taken into consideration in ICANN's
 developing these solutions. It is crucial that ICANN continues to
 listen to and incorporate the views and experiences of the relevant

parties in addressing any issues.

- It is likely that ICANN adds new TLD's in near future. In introducing the new TLD's, ICANN needs to develop mechanisms that avoid confusion and satisfy the demand of the community. One of ccTLD manager's responsibilities is to serve the interest of the relevant community. In this regard, we believe ccTLD's can provide valuable input to ICANN throughout the process for the introduction. So we propose ICANN continue to consider such input for the policy development.

- The initial process to address IDN TLD issue was slow as it took time to gain common understanding of the issues per se by multi-stakeholders, global organizations and individuals. In the past few years, however, the discussion has been accelerated to a very high level, accompanied by concrete action. Accordingly, we can now expect to see the first IDN TLD within a year or so. This acceleration is the evidence of the fact that complex issues have been tackled by ICANN's activities through participation of multiple stakeholders, including global organizations and individuals.

- In the early days, not many ccTLD's formalized their relationships with ICANN due to excess formality of the responsibility in the proposed contract. Later, however, ICANN poured efforts in perceiving the situation of ccTLD's, and a new framework based on mutual trust called Accountability Framework was introduced. It is noteworthy that as of January 22, 2008, as many as 53 ccTLD's, including 37 ccTLD's who signed Accountability Frameworks, have formalized their relationships with ICANN.

- In respect to more participation of ccTLD's in the ICANN process, a working group has been established in ccNSO; and we expect to see further development. We believe relationship between ccTLD's and ICANN will continue to be stabilized. JPRS, as a ccTLD manager, is certainly ready to contribute in achieving this.

- The plans for transition of the DNS responsibility should be carefully developed so that the transition does not damage continuity of the IANA function. We understand the IANA is the scope of the agreement that is separate from JPA, but we should take into consideration of the continuity of IANA function when developing the plan.

Finally, please let us emphasize that JPRS continues to support the private-sector management of the DNS. We strongly believe that now is the time to start developing the plan for transition in preparation for the upcoming termination of JPA.

Sincerely yours,

Koki Higashida

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