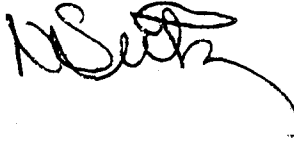


August 17, 2001

Memorandum For: Robin Layton  
Acting Associate Administrator  
Office of International Affairs

From: Neal Seitz  
NTIA Liaison  
NTIA/ITS



Subject: Technical Review of EDUCAUSE Proposal (and Associated Subcontract with VeriSign) for Administration of the .edu Top-Level Domain

Reference: EDUCAUSE Proposal to the U.S. Department of Commerce to Administer Policy and Operations of the .edu Top-Level Domain (August 10, 2001)

I have reviewed the subject proposal from a technical perspective, with primary emphasis on Attachment A, ".edu Registration Obligations." Overall I believe the EDUCAUSE proposal is outstanding and the proposed subcontract with VeriSign is appropriate and well-defined. As the leading association for information technology in higher education, EDUCAUSE is in an excellent position to administer .edu policy and operations. VeriSign (NSI) has been operating the .edu Top-Level Domain through a cooperative agreement with the National Science Foundation and (later) the Department of Commerce since 1996, and has the technical facilities and expertise to provide the .edu registry and supporting services described in the subcontract. In summary, I believe .edu TLD constituents and the Department would be well served by the contractual arrangements described in this proposal.

I do have a few detailed comments on the proposal. These are provided in the Attachment.

Cc: V. M. O'Day, NTIA/ITS  
M. Brown, NTIA/OCC

Attachment

Attachment – Review Comments on Proposed VeriSign (NSI) Subcontract

Agreement Page	Paragraph Number	Comment
3	4(a)	The phrase " <i>those members also become VeriSign's and that</i> " seems inappropriate and could be dropped.
7	9	The phrase " <i>and VeriSign shall not be liable for the consequences of any interruptions or errors</i> " seems quite forgiving. Paragraph 3(c) and 3(g) in the Products and Services Order (and VeriSign's industry reputation and motivation) largely mitigate this concern.
9	1.12	The meaning of IP " <i>numbers</i> " is unclear. The word " <i>numbers</i> " should probably be replaced with " <i>addresses</i> ."
10,12	2.1.1, 4.4, 4.4.1	The relationship between the " <i>API</i> " described in paragraph 2.1.1 and the " <i>menu driven command line interface ('Application')</i> " described in paragraphs 4.4 and 4.4.1 could be clarified.
13	4.6.1	The phrase " <i>VeriSign shall provide</i> " is redundant and could be deleted.
-1- (#1F)	2(b)	The term " <i>Program members</i> " is not clear in this context. The statement that " <i>these domain name registrations may eventually be accomplished through a domain name registration Application Program Interface</i> " seems a bit tentative in light of the clearly stated requirement to implement such an interface (see 2.1.1).