



28 June 2010

Ms Fiona Alexander
Associate Administrator
Office of International Affairs
National Telecommunications and Information Administration
US Department of Commerce
1401 Constitution Avenue, NW. Room 4701
Washington, DC, 20230

RE: Availability of Testing and Evaluation Report and Intent to Proceed With the Final Stages of Domain Name System Security Extensions Implementation in the Authoritative Root Zone [Docket No. 100603240-0240-01]

The Internet Society respectfully submits its comments on the above proceeding. In this proceeding, NTIA seeks comments on its intent to authorize the final stages of deployment of Domain Name and Addressing System Security Extensions (DNSSEC) at the authoritative root zone. The Internet Society welcomes this proceeding and offers its support of NTIA's proposal to proceed to deployment of DNSSEC in the root zone.

As we previously [noted](#), the Internet Society believes that the implementation of DNSSEC at the root zone level is of great importance to preserve the security and stability of the Domain Name System and, in turn, of the Internet itself. Having reviewed the "Final Report on DNSSEC Deployment Testing and Evaluation in the Root Zone", we concur it seems reasonable to expect operational success in going live with DNSSEC at the root.

We applaud ICANN and VeriSign's efforts to convey the substance of the experimental results in progress at various network operator group meetings. We believe the decision to move forward on any significant changes to Internet infrastructure should be driven by the Internet technical community and based on public review of evaluation reports. In the future, instead of relying *only* on NTIA and NIST, we would welcome Internet technical community leadership and public review consistent with established and proven practice in Internet organizations such as the Internet Engineering Task Force, in order to ensure broad support from the Internet community at each critical step along the path.

We welcome the progress made toward DNSSEC deployment at the authoritative root zone and encourage NTIA to move ahead quickly to final implementation by July 15, 2010.

Respectfully submitted,

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