

7 July 2006

Ms. Fiona Alexander,
Office of International Affairs,
National Telecommunications and Information Administration,
1401 Constitution Avenue, N.W., Room 4701,
Washington, DC 20230 USA

Subject: Docket No. 060519136-6136-01

Comments on the Continued Transition of the Technical Coordination and Management of the
Internet Domain Name and Addressing System

Thank you for providing us with the opportunity to offer our comments.

As the .JP ccTLD registry, JPRS has endeavored to contribute to the stable development of the Internet through registry operation as well as domestic and international cooperation in various fora including ICANN. JPRS therefore would like to express its views, based on the extensive experience it has gained.

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

(b) The Internet has evolved significantly because it is operated based on the single authoritative root led by the private sector. In this evolution, ICANN has played one of the central roles, and the principles mentioned above in (a) have also developed.

(c) Having said this, we have to admit that some of ICANN's projects are not fully completed at this moment. For example, establishment of formal relationships with the root server operators and further involvement of ccTLDs and governments remain limited, although they are improving. However, from the perspective of what has been achieved, the current level of cooperation of various organizations exemplifies the principles mentioned in (a) above. ICANN is also steadily evolving into an organization to help promote these principles even further.

(d) Based on the above observations, we recognize that ICANN has the capacity to autonomously implement its missions through properly liaising with other relevant stakeholders in the pursuit of excellence. Therefore, we wish to state our view that ICANN is the organization which shall play one of the central roles in Internet coordination, even after the completion of the Memorandum of Understanding with the Department of Commerce.

Yours faithfully,

Koki Higashida
President, Japan Registry Services Co., Ltd. (JPRS)