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Board of Directors
ICANN

Wednesday, July 27, 2011

Re: **Second Milestone Report of the Joint Applicant Support Working Group
Expanding Developing Economies Participation in the New gTLD Program**

Ladies and Gentlemen of the Board:

PCH commends the work of the JAS WG, and is in general agreement with the main points of its second milestone report. We would, however, like to provide comments relating to IPv6 and DNSSEC as mentioned in sections 4.1.1, 4.2, and 4.3.3.

We believe that it is both harmful and uncomplimentary to suggest that developing countries defer deployment of IPv6 and DNSSEC. Both technologies offer developing and economically-challenged applicants a level playing field in which more established and financially-endowed competitors are not inherently advantaged. Suggesting that applicants from developing countries forego this opportunity while those from developed countries are pursuing it aggressively would simply perpetuate the competitive inequalities of the digital divide, and squander an opportunity for economic, competitive, and capacity-building advancement.

Furthermore, it should be noted that ICANN, PCH, the OpenDNSSEC Project, ISOC, the IPv6 Forum, the Regional Internet Registries, and many other organizations have already invested considerable resources in order to ensure that everyone has equal access, at no cost, to the technologies and knowledge-transfer necessary to implement IPv6 and DNSSEC. This is a time for all of ICANN's constituents to reap the rewards of that investment; we should not be suggesting that those most in need be the last to benefit.

Thank you for your time and attention,

A handwritten signature in black ink, appearing to read 'Bill Woodcock', is written over a light gray background.

Bill Woodcock
Research Director
Packet Clearing House