

As requested at <http://www.icann.org/planning/consultation-stratplan-2008.htm>, the gTLD Registry Constituency (RyC) of the Generic Names Support Organization submits these comments to ICANN as part of the Initial Consultation for the June 2008 - July 2011 Strategic Plan. The comments are provided following each of the four questions asked.

1. What are the major factors that will affect the DNS over the next three to five years?
 - a. **The introduction of new TLDs** – It is quite likely that the process for introducing **new gTLDs** will be implemented in 2008; that process will eventually, if not at the same time, include **new IDN gTLDs**. It can also be expected that **IDN ccTLDs** will be introduced in 2008 or shortly thereafter. It is reasonable to predict that both of these happenings will result in significant changes in the size of the root zone file and in the use of domain names globally. While this will result in better meeting the needs of non-English speakers around the world, care must be taken to ensure that security and stability of the DNS will not be harmed and that new TLDs are introduced in a controlled manner.
 - b. **The growth in the frequency and sophistication of online cyber attacks** – ICANN’s primary mission is to ensure the security and stability of the Internet infrastructure, a main component of which is the DNS. Malicious and unintended attacks on the DNS will continue to grow in number and complexity, affecting DNS and Internet service providers.

2. What are the major issues facing ICANN over the next three to five years?
 - a. **The uncontrolled spread of IDN.IDNs outside the root** – The internationalization of the DNS is proceeding at a pace that has outstripped ICANN’s plans to deal with the issues raised by the use of IDNs. Throughout the world, domain names in the format IDN.IDN are being registered in ever-increasing numbers in a variety of scripts. These top-level domains are not in the ICANN administered root and are not presently globally operable. However, they are in such widespread use that they pose a risk to the fundamental concept that the Internet is and must continue to be globally interoperable. ICANN urgently needs a plan to ensure that the user demand for IDN.IDNs is met without fragmenting the Internet. The alternative is separate Internets, each in its own script.
 - b. **The impact of the domain name secondary market** – The secondary market for Internet domain names has grown beyond anything envisioned by most people as recently as several years ago. There are new uses of domain names, new business models and new ways to work around ICANN’s policies and procedures. As a result, domain names are increasingly unavailable for their originally intended uses. In addition, there are new concerns about cybersquatting and the protection of intellectual property rights.
 - c. **The Whois situation** - The Whois controversies have simply gone on too long. It should not have taken seven years to understand that there is no consensus on how to protect individual privacy. ICANN should adopt a plan looking forward to a compromise that maximizes protection of personal privacy while recognizing that there is a public interest in limited and controlled access to data by law enforcement and other qualified bodies.

- d. **Continual improvement to policy development processes** – ICANN has taken important steps to refine its policy development processes, but it still has a long way to go. It is critical that the completed and pending Supporting Organization and Advisory Committee reviews be used to achieve improvements in this area. Commissioning reviews is inadequate if there are no meaningful changes. Also, change should be viewed as a continuum, not as a routine to be performed every few years.
3. What are the most important issues for the ICANN community to discuss over the next three to five years?
 - a. **All of the above** – 1.a, 1.b, 2.a, 2.b, 2.c, 2.d.
 - b. **ICANN’s mission versus community demands** - How does ICANN maintain a balance between its limited mission and ongoing demands for involvement outside of that mission? There are security and stability issues posed by the unchecked growth of fraudulent activities such as “phishing-pharming”. ICANN should recognize that there may be areas where it can act within its mandate, and it should consider whether there are other venues where issues outside of ICANN’s mandate can be handled (e.g., spam and consumer protection).
 4. What should be ICANN’s priorities for the next three years?
 - a. **Security and stability of the Internet** should always be the #1 priority.
 - b. Providing a **ubiquitous IDN.IDN domain name experience** for as many non-English speakers as possible should be a high priority. This should include both **gTLD and ccTLD users**, without favoring either group. ICANN should take steps to minimize name confusion and ensure that dispute resolution processes are as simple as possible.
 - c. Significant improvements in policy development processes should be made in all ICANN supporting organizations and advisory committees separately and in their interaction with one another.

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