

CEO Rod Beckstrom  
ICANN  
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USA

Copenhagen, 21 January 2010

Dear Rod Beckstrom,

The Danish Internet Forum (DIFO) wishes to thank ICANN for the opportunity to comment on ICANN Draft Strategic Plan July 2010 – June 2013 (hereinafter Strategic Plan). DIFO is responsible for the Danish top-level Internet domain, .dk. Its core business is the registration of domain names and the administration and technical operation of the national domain name registry in Denmark.

DIFO acknowledges the work, which has been done in creating the Strategic Plan. DIFO has the following comments on ICANN Strategic Plan:

#### **General comments**

DIFO recognizes ICANN as a multistakeholder private sector, non-profit organization and support ICANN's vision of a unified global Internet that works for everyone.

Nevertheless, DIFO finds the Strategic Plan to be overly cursory. In our opinion it is necessary to be more specific on how the various strategic objectives will be reached. It is stated in the Strategic Plan that "details of staff work will be provided in the final plan." The lack of information about the work load, makes it difficult to comment on the objectives and projects, since the balancing of which objectives to prioritize - and the effort needed to reach the objective - are important factors in assessing and prioritizing a strategic plan.

By not being specific, ICANN fails to fulfill its aim to be transparent. As the Strategic Plan stands, it gives too much room for uncertainties in how and when, the various objectives are supposed to be carried out.

#### **Preserve DNS stability and security**

DIFO finds it important, that ICANN is prioritizing DNS stability and security. DIFO supports the implementation of DNSSEC, and DNSSEC will be implemented in the .dk-zone from 1 July 2010.

DIFO supports the establishment of a DNS collaborative security response system to coordinate effective response to attacks on the DNS, and finds this very useful to the Internet society in general.

### **Promote competition, trust, choice and innovation**

DIFO recognizes that ICANN's mission includes coordinating the operation and evolution of the DNS root server system. DIFO is therefore very pleased with the introduction of IDNs and the related possibilities to have domain names in various languages. However, there is a need to distinguish between IDNs and new TLDs, which is not reflected in the Strategic Plan. Whereas IDNs need to be implemented as soon as possible, DIFO is more reluctant to new gTLDs. As stated in DIFO's comment to DAG3, there seems to be no need for "brand" gTLDs in the Danish Internet community.

These and many other issues about IPR, scaling of the root etc. need to be thoroughly analyzed before introducing new gTLDs (and new geographical TLDs). Hence DIFO can not support that "The ICANN community will work through these [technical challenges and policy issues] as they arise." DIFO finds it important to underline, that the issues related to new gTLDs, need to be examined further - and in detail before their introduction.

DIFO supports that ICANN continues "to develop and implement policy to strengthen consumer trust in the domain name registration system". Again, DIFO will underline, that this is not done by introducing many new gTLDs, and thus losing the well-arranged structure, which characterizes the Internet at the moment.

To DIFO there seems to be no necessity to introduce new gTLDs. No reports have shown a commercial need or the consumers' need for more TLDs that can justify an expansion that can only imply a more complex TLD-structure on the Internet. However, if new gTLDs are introduced, geographical TLDs should be registered as ccTLDs, not as gTLDs.

DIFO strongly supports that ICANN encourages the uptake of IPv6 in order to secure sufficient address space for users across the globe. DIFO finds it very important that ICANN is proactive in supporting the implementation of IPv6.

### **Excel in IANA and other core operations**

ICANN indicates that it plans to make significant investments in upgrading the IANA function. It is not clear which investments are needed, and how much money will be spent. DIFO supports IANA being a part of ICANN, together with "flawless IANA operations" and "improved resilience". However, it is not possible for DIFO to get a picture of whether the planned strategy is reasonable or not. This is an example of the Strategic Plan being too cursory.

### **Contribute to shaping a healthy Internet eco-system**

DIFO appreciates, that ICANN works to make sure that the views of all stakeholders are heard on Internet-related issues, and agrees that this public comment period is part of this effort. As part of this, DIFO finds it important to evaluate, how the different methods of

reaching as many people and communities as possible are working. These evaluations should be publiced, and the methods should be open to discussion on ICANN's homepage and at ICANN meetings.

In order to be as transparent as possible, ICANN is advised to consider restructuring the ICANN homepage. DIFO finds it difficult to navigate and find the documents needed with the current structure. The homepage would gain much from being more logically arranged in order to find information.

On behalf of the Board of Danish Internet Forum  
Yours sincerely,



Lise Fuhr  
CEO  
Danish Internet Forum