



November 22, 2009

Mr. Kurt Pritz
Senior Vice President, Services
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292 USA

Dear Kurt,

Neustar appreciates the opportunity to submit comments to the TLD Draft Applicant Guidebook Version 3 (DAGv3). Neustar's detailed comments are captured in the Registry Stakeholder Group's November 21, 2009 submissions found at: <http://forum.icann.org/lists/3gtld-guide/msg00069.html> and <http://forum.icann.org/lists/3gtld-guide/msg00086.html>

Neustar also previously submitted comments on the issue of registry-registrar separation, which are located at: <http://www.icann.org/correspondence/lubsen-to-dengate-thrush-12oct09-en.pdf>
The following summarizes our position on this critical issue.

The nearly decade-long policy of registry-registrar functional separation has been one of ICANN's great organizational successes to date. The breakup of the legacy monopoly structure, with a requirement for a separation between registry and registrar functions, has enabled healthy and vibrant competition among registrars to the ultimate benefit of the consumer in the form of expanded choice and lower registration fees.

During the last decade, this successful market structure has prohibited registries from acting as a registrar in their own TLD, which has guaranteed equal access to all registrars and registrants without fear of preferential treatment or insider trading of registry data. Language in the DAGv3 would reverse this long-standing, fundamental policy and would amount to a major change in the structure of the domain name marketplace.

This issue is not about cross-ownership or whether existing registrars should be able to compete for new TLD business, either as a front-end or back-end provider. To be very clear, Neustar believes registrars should be permitted to become registry operators, but the long-standing, successful policy of structural separation should remain in place. A reversal of this policy would negatively impact consumers and reverse the very real successes of the last decade.

Neustar supports new TLDs and we look forward to the release of the next version of the Draft Applicant Guidebook.

Sincerely,

Keith Drazek
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