

August 8, 2002

The Honorable Nancy Victory
Assistant Secretary for Communications
and Information and
Administrator, National Telecommunications
and Information Administration
U.S. Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, DC 20230

Dear Ms. Victory:

As an organization that has participated in the ongoing development of ICANN since its inception, NeuStar, Inc. would like to reaffirm its commitment and continued support for the Internet Corporation for Assigned Names and Numbers (“ICANN”) as the private-sector body responsible for coordinating the global Internet's systems of unique identifiers.

In addition, NeuStar supports the belief that ICANN’s mission is to coordinate the stable and secure operation of the Internet's unique identifier systems. In particular, as stated in ICANN’s Blueprint for Reform, ICANN should be responsible for (a) coordinating the allocation and assignment of three sets of unique identifiers for the Internet, (b) coordinating the operation and evolution of the DNS's root name server system, as well as (c) coordinating policy-development as reasonably necessary to perform these technical functions. Moreover, NeuStar agrees with ICANN’s statement of its Core Values, including in particular, the promotion of a sustainable competitive environment for gTLD Registries and ICANN-Accredited Registrars.

NeuStar recognizes that ICANN is an evolving internationally-based institution that exists in a complex and demanding global environment. Despite this enormous challenge, NeuStar believes that ICANN has been successful in achieving a number of key accomplishments, including the introduction and promotion of competition for gTLD registries and registrars which has resulted in more choice and competitive prices for consumers. It is the view of NeuStar that a reformed ICANN is essential not only to achieve its primary mission as set forth in the ICANN Blueprint for Reform, but also to ensure a level playing field between the existing dominant provider of gTLD registry services and each of the new registries. Until such a level playing field can be achieved, NeuStar believes that market forces alone are insufficient to achieve fair and sustainable competition at the gTLD registry level.

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NeuStar also recognizes that the current system can and should be improved. ICANN needs to (i) reform its decision-making processes to provide for greater transparency and accountability, (ii) ensure that the views of all Internet stakeholders are heard, particularly those that are most impacted by the proposed ICANN policies (iii) create an effective advisory role for governments, and (iv) devise an adequate mechanism for the creation of sufficient financial and personnel resources to carry out its mission.

NeuStar looks forward to continued participation in the ICANN reform process and believes wholeheartedly that with the appropriate processes and procedures in place, ICANN can further enhance competition and provide for greater transparency and accountability.

We look forward to continued discussions with you and your staff on these important issues. Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/

Gerald J. Kovach
Senior Vice President
External Affairs