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Hon. Fiona Alexander
Associate Administrator
Office of International Affairs
Department of Commerce
14th and Constitution Ave., N.W.
Washington, D.C. 20230

Re: National Telecommunications and Information Administration
Docket No. 060519136-6136-01

Dear Ms. Alexander:

This letter is written in support of ICANN and its activities in fulfillment of the requirements of the Department of Commerce National Telecommunications and Information Administration – Internet Corporation for Assigned Names and Numbers Memorandum of Understanding (MoU). As you know, the Public Interest Registry (PIR) was created by the Internet Society (ISOC) to be the manager of the registry of the .ORG top level domain.

From its vantage point as a registry operator, PIR believes that ICANN has taken clear and significant steps to create an environment with many benefits for the end-users of the Internet. These include the promotion of competition in the domain name space both at the registry and registrar levels, and the institution of the UDRP to provide effective resolution of trademark-domain name controversies.

PIR supports the formal comments filed in the above proceeding by ISOC on 7 July 2006, and will not add to the formal record in the proceeding except to record this support.

PIR believes that the issues raised in the proceeding are of the greatest importance to the domain name system. PIR would like to emphasize its strong support for the internationalized multi-stakeholder bottom-up model that ICANN represents. As a participant in ICANN processes, PIR believes that ICANN is strong enough to move away from the current United States government oversight model. This is especially true as it relates to specific current issues, such as internationalized domain names, the WHOIS function, and the creation of new domain names that are of direct importance to registries and registrars.

Based on this confidence, PIR joins with ISOC in its call for the U.S. government to live up to the original intent of the first MoU and allow ICANN to move to an independent private sector institution exercising a role of coordination rather than control. In order to assure the stability of the domain name system as the Internet grows and evolves, PIR urges NTIA to avoid unnecessary constraints on its natural and inevitable technological evolution.

PIR further urges NTIA to recognize the necessity for all users to participate in the ICANN model so that ICANN is empowered to facilitate processes that meet users' needs.

Respectfully submitted,

PUBLIC INTEREST REGISTRY

cc: Suzanne Sene, NTIA
Paul Twomey, ICANN
Theresa Swinehart, ICANN

By _____
Edward G. Viltz, President and CEO