To the
National Telecommunications and Information Administration,
U.S. Department of Commerce
DNSTransition@ntia.doc.gov

Vienna, 7th of July 2006

Dear Madam,
Dear Sir,

We, the ISPA – Internet Service Providers Austria, the association of ISPs in Austria and a key stakeholder of the Local Internet Community were invited to comment on ICANN's management over the Internet domain system and addressing system, and are grateful for that opportunity. We note that the registry for the at TLD is also member of the ISPA and managing directors are represented on the ISPA executive board.

nic.at GmbH, seated in Salzburg, Austria is the official registry for .at domains, and therefore subject to Austrian law. nic.at has been providing the registry service under supervision of the Local Internet Community as represented on it's Domain Name Council since 1998 in an open and transparent way. The ISPA - representative of ISPs and registrars - would like to emphasize the fact that the entire LIC in Austria is very satisfied with nic.at GmbH's performance.

Our views on your inquiry are as follows:

- We support the concept of ICANN acting as the global coordinator and enhancing stability of the Internet all over the world.

- We support private sector leadership and a bottom-up approach to decision-making.

- We consider national governments an important part of the LIC, among other stakeholders.

- We believe ICANN should concentrate on its core mission (stability and coordination) and reduce policy activities to a minimum. In particular, ICANN shall in no way be involved in decisions better left to the local community.

- According to the WSIS declaration, no other country or organisation shall decide on ccTLD policy. This declaration shall also apply to ICANN.

- The involvement of all stakeholders (including governments) within the ICANN processes is important, and be performed through appropriate bodies within the ICANN context.

- In our view, a contractual arrangement with ICANN and ccTLD´s is neither necessary nor desirable. We understand nic.at GmbH is willing to provide a reasonable contribution to ICANN's expenses, relating to the IANA operating cost.

- The IANA function should be streamlined and automated, for instance by using the e-IANA software. We underline that substantial progress has been made with respect to IANA process backlog and organisational structure, and acknowledge the major contribution of David Conrad and his team.

- We do not understand why the DoC still has control over, and approves of changes in the .at root zone entries. We consider these an exclusively national matter.

- We welcome ICANN's IDN and internationalisation efforts, but see a limited impact on registries like nic.at. We do welcome the DNSsec initiative, and note that a signed root zone would be a major step forward.

- We believe additional gTLD's are of limited value – the TLD business is highly competitive, there is no scarcity in the DNS namespace, and we suggest to keep in mind that many new gTLD efforts have turned out as flat-out failures.

- We consider ICANN a policy-making body for gTLDs, but not for ccTLD's, as stated above.

- We would particularly welcome Service Level Agreements with IANA and understand nic.at GmbH would be willing to contribute funds to achieve them.

- We note that a detailed budget for IANA (cost and expense) are lacking.

Overall, we support the ICANN concept. However, we consider the out-of-scope policy making attempts and the ballooning ICANN budget as issues to be addressed.

We are grateful for the opportunity to express our point of view and remain
Yours truly

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