



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Telecommunications and**  
**Information Administration**  
Washington, D.C. 20230

SEP 9 2008

Dr. Paul Twomey  
President and CEO  
Internet Corporation for Assigned Names and Numbers  
4676 Admiralty Way, Suite 330  
Marina del Rey, CA 90292

Dear Dr. Twomey:

Thank you for submitting the September 2, 2008, proposal for implementing the domain name system security extension (DNSSEC) protocol in the root zone to the Department of Commerce (Department) for its consideration. The Department remains committed to preserving the stability and security of the Internet domain name and addressing system (DNS) and appreciates the efforts of the Internet Corporation for Assigned Names and Numbers (ICANN) in this regard. The deployment of DNSSEC at the root zone represents one of the most significant changes in the architecture of the DNS in the past decade and raises complex implementation issues. As such, the Department in the coming weeks will seek public input on all aspects of DNSSEC deployment to ensure that it is implemented in the manner that best assures our common goal.

The Department is currently conducting a thorough review of the proposal submitted by ICANN and will want to reference ICANN's proposal in our broader DNSSEC process, dependent upon the results of this review. To facilitate this, please provide a copy of the proposal without information that ICANN considers to be trade secrets or privileged commercial or financial information. Please provide us with the revised document no later than Wednesday, September 17, 2008. For some guidance on the information that can be withheld from the public, your counsel may wish to review case law, such as *National Parks and Conservation Association v. Morton*, 498 F.2d 765 (D.C. Cir. 1974).

Lastly, the Department considers the ICANN proposal to have been submitted as a proposed modification to the Internet Assigned Numbers Authority (IANA) functions contract. Given that the proposal would alter root system responsibilities contrary to the performance exclusions in the contract and would materially change the established methods for performing the IANA functions, the Department does not authorize ICANN to engage in public consultations on this proposal or the terms of the IANA functions contract.

Thank you again for the submission of this thoughtful and timely proposal. We look forward to working with ICANN and others in the Internet community to determine the best way to deploy DNSSEC within the current DNS architecture.

Sincerely,

A handwritten signature in black ink that reads "MA Baker" with a long horizontal flourish extending to the right.

Meredith A. Baker  
Acting Assistant Secretary  
for Communications and Information

cc: Mr. Peter Dengate-Thrush, Chairman of the Board of Directors, ICANN  
Doug Brent, Chief Operating Officer, ICANN