EDUCAUSE Comments on Enhancement of the .us Domain Space
October 5, 1998

Background

This document is submitted in response to National Telecommunications and Information Administration docket 980212036-8172-03, which invites public comment on the future use and management of the .us domain space of the Internet.

EDUCAUSE is an association of more than 1500 colleges and universities in the United States with primary interests and programs in the field of information technology for research and education. This community has pioneered the use of the Internet, owns and operates more than four million Internet hosts, and holds domain names in both .edu and .us. EDUCAUSE has previously submitted comments in the NTIA proceeding on Technical Management of Internet Names and Addresses, whose substance is contained in the “Green Paper” of 2/20/98 and the subsequent “White Paper” of 6/10/98. In its previous comments, EDUCAUSE (the successor organization as of 3/1/98 to Educom) endorsed the principles and goals of the Green Paper and made specific suggestions relating to the management of the registry and registration functions for domain names. In this response, we submit a number of general recommendations, followed by responses to those parts of the questions for public comment which are of primary interest to our members.

General Recommendations.

1. The basic policy direction for the use of the .us domain should continue to be provided by the federal government. This is not only consistent with the manner in which ccGTLDs are managed by other national governments, but it recognizes that the use of the national identifier is intrinsically a governmental function. On a day to day basis, the management and operation of .us can be subcontracted or delegated by the government in any of a number of ways. For instance, the operation of .gov is subcontracted by the General Services Administration to a private sector company.

2. The present policy restrictions and conventions which make .us primarily a locality-based system should be substantially modified or eliminated. The locality convention leads many people to believe that a state and local domain name host is in fact physically located in the location of the name. This is not necessarily true and is rapidly becoming less true as mail and web hosting services expand their support of a variety of domain names and TLDs. The Internet domain name space is NOT geographically specific and never has been. To the extent that geographic location information becomes useful in the provision of Internet services, such information can be rapidly and accurately derived from sources such as the satellite based GPS system. There not only is no need to preserve the geographic conventions...
in .us, but to do so would substantially inhibit the desired expansion of use of the name space. However, those name holders in .us for whom the locality designation is valuable should be permitted to continue to use it in that manner.

3. In order to promote the goals of open competition presented in the Green Paper, the future management of .us should conform to the separation of registry and registration functions described in the Green Paper. Unless there are persuasive national policy considerations to the contrary, the registry function and registration function of .us should follow policies established by the new domain names non-profit corporation.

Comments on Specific Questions

Q. What rules and procedures should be used to minimize conflicts between trademarks and domain names under .us?
A. WIPO is actively engaged in a normalization and rationalization process for Internet names and trademarks. A dispute resolution procedure is a specific goal of the present consensus process. A representative of .us should actively participate in this work, and future policy for .us should observe the conventions adopted by the WIPO parties unless there are persuasive U.S. national policies which dictate otherwise.

Q. What role should states play in the allocation and registration of their respective subdomains?
A. It does not appear cost effective for individual states to operate a state level registry and registration function. However, there are unique needs of state, regional, and local government agencies and entities that may be represented best by a single registry devoted to governmental interests in the .us domain. This could be administered through an entity such as the National Governors Association, the League of Cities or an equivalent membership organization.

Q. How should the operation of the .us registry be supported?
A. Within the same general framework of fees as is established for the gTLDs by the new domain name corporation.

Q. By what type of entity should .us be administered?
A. Consistent with its previous comments on the Green Paper, EDUCAUSE believes that the public trust aspects of the TLDs, including the ccTLDs, require a non-profit entity to manage and administer policy for the .us domain. All operational aspects, including databases and registration functions, can and should be awarded to one or more qualified bidders through a competitive process.