



Mr. Peter Dengate-Thrush  
Chairman of the Board of Directors  
Internet Corporation for Assigned Names and Numbers  
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USA

National IT and Telecom Agency

Ministry of Science  
Technology and Innovation

**Dear Chairman Dengate-Thrush**

The Danish Ministry of Science, Technology and Innovation appreciates the opportunity to comment on the documents regarding the introduction of new generic top level domains (gTLDs), including a Draft Applicant Guidebook, posted for public comment by the Internet Corporation for Assigned Names and Numbers (ICANN) on 23 October 2008.

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While acknowledging ICANN's efforts in preparing the documents and ICANN's long standing goal to promote competition and consumer choice, the Ministry of Science, Technology and Innovation believes there are outstanding issues that ICANN needs to address and act upon effectively in the revised policy documents before the introduction of new gTLDs is implemented, e.g.:

1. In promoting competition and consumer choice the focus of ICANN should be to lower costs, promote innovation, and enhance user choice and satisfaction, as stated in the Memorandum of Understanding between the Department of Commerce and ICANN.
2. It must be ensured that the introduction of new gTLDs, including internationalized domain names, will not put at risk the security and stability of the DNS.
3. The ICANN Board should focus on *coordinating* the management of the DNS and not on issues more appropriately addressed by governments and other entities, including the appropriate advisory committees and support organisations within ICANN.
4. ICANN must take into account the GAC Principles regarding new gTLDs, including national and geographical interests.
5. It is important that appropriate mechanisms including appropriate objection mechanisms are in place through all stages of the application process to ensure the protection of consumer interests.
6. It is essential that ICANN show sufficient capacity to enforce contract compliance of both existing and new registries.

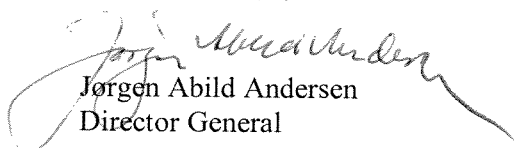
7. The introduction of an unlimited/unknown number of new domain names does not seem to take the scarcity of IP-address resources into consideration.
8. ICANN should limit the number of new gTLDs because the fundamental search structure of Internet domain names may be blurred making it difficult for users to navigate, if a vast number of TLDs are introduced.
9. The issue of disproportionately high costs for defensive registration must be managed by ICANN in order to protect national and trademark protection.
10. The amount of the application fee should be reduced as the amount may discriminate against less financially resourceful applicants, such as small enterprises and communities.
11. In regard to ICANN's status as a non-profit entity, transparent mechanisms for the disposition of excess revenues must be in place.
12. The process of introducing new gTLDs should in itself be accountable and transparent to the entire community and be executed according to ICANN's multi-stakeholder model.

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The Danish Ministry of Science, Technology and Innovation looks forward to engage in further consultations with all stakeholders and ICANN in reaching a common understanding on how to move forward in the development of Internet Governance.

Yours sincerely,



Jørgen Abild Andersen  
Director General

Ministry of Science, Technology and Innovation  
National IT and Telecom Agency

Cc: Dr. Paul Twomey, President and CEO, ICANN