**Input for the European Commission
Hearing on Internet Governance arrangements
6 May 2009**

CENTR, the Council of European National Top Level Domain Registries, is the world's largest of Internet domain name registries. CENTR has over 50 members which account for over 85% of the country code domain name registrations worldwide. Each CENTR Full Member operates a country code top level domain. In this capacity they play a pivotal role in the stability of the Domain Name System and the Internet.

The CENTR Board of Directors welcomes the opportunity to contribute to the hearing on Internet Governance, organised by the European Commission on May 6th 2009 in Brussels. In our contribution we have used the preliminary agenda as guidance for our comments and reflections on the main meeting topics.

We believe that one of the key principles of WSIS as agreed during the Geneva phase and reinforced at the Tunis phase still stands: "Building a people-centred Information Society is a joint effort which requires cooperation and partnership among all stakeholders." The ccTLD community brings this principle into practice at two different levels: 1. On a national level, many ccTLDs have a governance model based on the participation from the local community. 2. On an international level the ccTLD community has actively supported this principle by continuous contributions to the Internet Governance Forum and cooperation with organizations such as ICANN and ISOC. Through this mechanism of cooperation and partnership, significant steps have been taken towards the achievement of the WSIS goals. It is essential to continue these efforts, the results of which can be witnessed through the IGF and many regional and national initiatives.

Security and stability are key elements for a thriving Internet economy. The ccTLD industry is proud of its excellent track record in stepping up to the challenges and guaranteeing a stable and secure DNS. At the same time, the ccTLD community is well aware of the increasing challenges to the Internet's security and stability and remains committed, within its role, to meet them through continuous investment in technology and people, training sessions and sharing best practices. Probably one of the main reasons for this success can be found in the diversity of registry architecture and the different choices that have been made when implementing technology and policy. The variety of approaches intends to meet the different local needs.

One of the main challenges in the future will be the balancing act between standardization and best practice sharing and the need to avoid single points of failure by fostering that diversity.

In every country, governments and other public authorities are involved in Internet Governance to some extent. Through privacy laws, telecommunication regulations, liability rules or monitoring

competition on telecommunication networks governments and regulators have important and necessary means to correct any market failure. Within this legal framework, industry has an important role in providing the investment and technical know-how to provide a secure and stable infrastructure, and has taken the leadership and responsibility to provide the networks that Europe needs to underpin its competitiveness.

Government participation and involvement in Internet Governance should be a balance based on local needs and political reality, as it is the case today for the various degrees in which governments are being involved in ccTLD governance models. There is no one size fits all. Coordination between governments should be encouraged, but the principle of subsidiarity should be respected and such coordination should be aimed at promoting decentralized decision making, responding to the local needs and contributes to the strength of the Internet architecture.

Providing global accountability to all Internet users is certainly going to be a major challenge given the diversity of interests across different stakeholder groups and through the international community. Inevitably the ICANN model is imperfect, but it provides accessibility in a way that no other organisation has ever done before. Through the multi-stakeholder process we have made progress on relevant issues such as the introduction of IDN ccTLDs. We would encourage ICANN to continue to move forward rapidly on this work: many countries will see the early introduction of IDNs as key to its credibility. In our letter to the NTIA, dated 19th February 2008, we were looking forward to the implementation of IDNs in the root zone by the end of that year.

On other issues where we have expressed a strong concern in the past such as transparency and accountability, we have seen consistent improvement to a level that can be expected from a professional organization. We believe that a lot of that progress has been made possible and encouraged by the Joint Project Agreement.

Similarly, progress has been made on improving the operation of the IANA function, even though the automation through the eIANA still needs to be completed.

The introduction of IDN TLDs and new gTLDs will prove to be a key phase in ICANN's existence. We feel that the significant progress that has been made depends on a stable basis for the company's governance structure. To date we have not heard of any realistic alternative that could replace the current model by the expiry date of the JPA.

Internet Governance brings together some exceptionally complex issues, many of which do not have clear-cut solutions and which need cooperation between many different organisations and experts globally: they need to be addressed with caution.

It is important to make the distinction between the two layers. Since Internet is global, technical standardization should be dealt with at a global level. Organisations such as IETF have fulfilled their role successfully over the last 25 years and we strongly believe that there is no need for change.

On policy issues decentralized decision making based on international coordination and cooperation is the key. Differences in the needs of local communities (e.g. privacy requirements in the US

compared to Europe) and in the legal environment in the various countries and territories could easily lead to never ending discussions or lowest-common-denominator solutions that will almost never lead to satisfactory results. To use the example of the ccTLDs: while strongly united on regional and international levels through the regional organisations (AFTLD, APTLD, CENTR and LACTLD), each implements the policy that fits in with the national legal framework and benefits their local community the most.

Developing common understanding of issues and developing shared appreciation of the ways that these issues can be addressed can help inform national and European policy making. IGF has shown itself to be an ideal framework for helping respond to the challenges of the information age and to ensure we get the best of the opportunities that the Internet offers. We are pleased at the way some Member States and the European institutions have taken a global lead in the IGF: this leadership reflects well on Europe and will help shape an Internet economy based on European values such as free speech, openness and fair competition. Many CENTR members are active in contributing to this work both nationally and in European initiatives.

Closing the digital divide was one of the most challenging goals of the WSIS process. While individual capacity building efforts such as those led by some CENTR members have proven to be successful, large-scale efforts to get more developing countries to participate in IGF or ICANN have proven to be less effective. The lack of understanding of the importance of Internet Governance is identified as one of the main causes of this failure, but some countries still have not accepted the value of multi-stakeholder cooperation in addressing these issues. As one of the leaders in developing the Tunis Agenda, Europe has a special responsibility to help promote the outcomes of Tunis as a way of addressing international Internet governance.

On behalf of the CENTR Board of Directors,

Peter Van Roste   Andrzej Bartosiewicz
CENTR General Manager   CENTR Chairman