

September 14, 2011

Rebecca Blank
Acting Secretary
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Lawrence E. Strickling
Assistant Secretary for Communications and
Information
National Telecommunications and
Information Administration
1401 Constitution Ave., NW
Washington, DC 20230

Dear Acting Secretary Blank and Assistant Secretary Strickling,

As the Department of Commerce and NTIA consider the various policy options surrounding the September 30 expiration of the Internet Corporation for Assigned Names and Numbers (ICANN) authority as the designated Internet Assigned Numbers Authority (IANA), I urge you to put in place guidelines that ensure any future IANA has clear ethics rules and conflict of interest requirements in place.

As you know, any designated IANA is hugely important in regulating the multi-million dollar domain name industry. At the same time, because the IANA is not a branch of the federal government, its executive leadership is not subject to the same financial disclosure, ethics, or conflict of interest rules as executive leadership at federal agencies or in Congress.

While this arrangement may have been unproblematic in the early stages of the Internet, the growth of the domain name industry and the increasing importance of the decisions made by the IANA have lead to an increasingly large, sophisticated, and expensive agency in ICANN. With the growth in importance of this authority, it is important to ensure that decisions are made impartially.

Moreover, the importance of the domain name system requires that companies and individuals have a clear understanding that the IANA is acting in a transparent manner, just as NTIA employees are required to do. While I support the control of this system by NTIA, I also believe that any IANA employees ought to be made subject to the same ethics rules in place as NTIA employees.

I urge you to include requirements for strict ethics guidelines in any future agreement with a designated IANA and I look forward to working with you in the future.

Sincerely,



Ron Wyden
US Senator