



April 13, 2009

VIA EMAIL

Mr. Peter Dengate Thrush
Chairman of the Board of Directors
Dr. Paul Twomey
President and CEO
ICANN
4676 Admiralty Way, Suite 330
Marina del Ray, CA 90292

Re: Comments of Microsoft Corporation on Technical Considerations
Relating to the Introduction of New gTLDs

Dear Mr. Dengate Thrush and Dr. Twomey:

Microsoft Corporation ("Microsoft") welcomes this opportunity to provide its comments to ICANN on technical considerations in connection with Version 2 of the new gTLD Draft Applicant Guidebook ("DAG 2").

Microsoft is a worldwide leader in the IT industry, with a mission to enable people and businesses throughout the world to realize their full potential. Since the company was founded in 1975, it has worked to achieve this mission by creating technology that transforms the way people work, play, and communicate. Microsoft is also an owner and champion of intellectual property rights. It maintains sizable trademark and domain name portfolios and takes pride in the worldwide recognition of multiple of its trademarks. Further, Microsoft's businesses rely heavily on the Internet and the current system of top level domains, and Microsoft is an ICANN-accredited registrar. As such, Microsoft was well positioned to provide meaningful comments to ICANN on the technical considerations related to the introduction of new gTLDs in connection with the first version of the new gTLD Draft Applicant Guidebook and remains well positioned to do so on DAG 2.

Microsoft appreciates that the ICANN Board has requested the SSAC and RSSAC to conduct jointly a study of the potential impact on DNS security and stability of the combined introduction of IPv6, DNSSEC, IDNs, and new TLDs. However, it remains unclear whether many of the concerns Microsoft raised in its prior comments on technical considerations will be considered "within the scope" of the noted study. ICANN should provide further clarity on the manner in which questions will be gathered and catalogued concerning the scaling-up of

Mr. Peter Dengate Thrush
Dr. Paul Twomey
April 13, 2009
Page 2

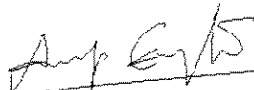
the root and whether those questions will be answered in this study. Microsoft reserves further comment until the results of that study are made available.

Microsoft staff is available for further discussion of these issues with ICANN.

Thank you for your consideration. If you have questions or wish to discuss any of the points raised herein, please contact Anoop Gupta (anoop@microsoft.com) or Dan Simon (dansimon@microsoft.com).

Respectfully submitted,

Microsoft Corporation



Anoop Gupta
Corporate Vice President



Dan Simon
Principal Architect, Windows Networking