

To: Esther Dyson, Interim Chairma  
ICANN Initial Board of Directors

From: Eric E. Menge, Assistant Chief Counsel for Telecommunications  
Office of Advocacy, U.S. Small Business Administration

Date: August 25, 1999

Re: ICANN At-Large Membership

The Office of Advocacy of the United States Small Business Administration supports most of the recommendations in the Staff's Report on ICANN At-Large Membership. For full discussion of the Office of Advocacy and the role of small business on the Internet, please see our comments filed in response to the DNSO WG-A's Final Report to the ICANN Board, filed with ICANN on August 25, 1999.

Advocacy would like to address directly two of the proposals contained in the staff report.

Advocacy believes that membership criteria contained in Recommendation III.1 must be carefully considered because of the impact it will have in determining membership. Advocacy agrees with staff's recommendations on the first four criteria presented, but the requirement to support the cost of ICANN membership could create a barrier to participation for representatives from individuals and small businesses. If a membership fee is to be assessed, Advocacy urges ICANN to keep the fee low or to provide a waiver process for either the entire fee or a part of the fee.

In response to Recommendation IV.2, Advocacy offers its assistance to the ICANN staff in its efforts to attract membership. Advocacy has extensive contacts with individual small businesses and with small businesses associations and could facilitate ICANN's outreach efforts.

Thanks you for consideration of these issues.