



Hong Kong Internet
Registration Corporation Limited
香港互聯網註冊管理有限公司

Our Ref: 11-2523

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**RE: Response from Hong Kong Internet Registration Corporation Limited (HKIRC) to
NTIA Further Notice of Inquiry (FNOI) on the IANA functions**

About HKIRC

Hong Kong Internet Registration Corporation Limited (HKIRC) is a non-profit-distributing and non-statutory corporation designated by the Government of the Hong Kong Special Administrative Region to administer the registration of Internet domain names under .hk and .香港 country-code top level domains (ccTLD). We are the designated manager of the ccTLD .hk and internationalised country-code top level domain (IDN ccTLD) .香港 as recorded in the IANA root zone database.

Comments

HKIRC welcomes the opportunity to provide comments in response to the National Telecommunications and Information Administration's (NTIA's) Further Notice of Inquiry on the IANA functions. HKIRC provided its comments to the Notice of Inquiry (NOI) released by NTIA on 25 February 2011 on the related matters and appreciates NTIA's consideration and adoption of our comments submitted on 31 March 2011.



HKIRC's specific comments on the Draft Statement of Work (Draft SOW) are as below:

Working relationship between the Contractor and its stakeholders (C.1.4 and C.2.2.1.1)

HKIRC opines that clause C.1.4 might not have reflected accurately the working relationship between the Contractor and its stakeholders including but not limited to IETF, IAB, ccTLD managers, governments, and the Internet user community. The “close constructive working relationships” should be spelt out as where the Contractor operates based on and following the policies developed and agreed upon by all interested and affected parties.

While the Contractor shall remain functionally a purely operational and technical entity, nevertheless, “prohibiting any and all staff dedicated to executing the IANA functions... from any policy development”, as stipulated in C.2.2.1.1, might not be beneficial to the community. IANA staff should be directed to cooperate with, and provide information and resources to, related policy and process development activities amongst the community of stakeholders. We are aware of the fact that IANA staff's inputs in terms of information and communications during different policy development processes have proven to be valuable within the Country Code Names Supporting Organisation (ccNSO).

HKIRC therefore recommends editorial revision to the clauses of C.1.4 and C.2.2.1.1 to reflect the above said working relationship.

Fees (C.2.2)

HKIRC would like to point out that there are established principles and practices recognising the interests of national sovereignty over country code Top Level Domains (ccTLD) and the voluntary basis of contribution by ccTLD to maintain the IANA functions. Different stakeholders are working together to review policies on contributions by different parties to maintain the IANA functions and mentioning of collecting fees in the SOW will unintentionally pre-empt the work already done and limit the options that can be considered. We are of the view that the matter regarding fee collection by the Contractor needs not be mentioned in the SOW.



Apart from the comments mentioned above, HKIRC would like to extend its appreciation to NTIA's effort in analysing and compiling the considerable amount of comments received earlier on the NOI to come up with the current FNOI and the draft SOW. HKIRC looks forward to providing further comments and assistance to the procurement process of the IANA functions in the future.

Yours sincerely,

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