

Fiona M. Alexander,
Associate Administrator, Office of International Affairs,
National Telecommunications and Information Administration
US Department of Commerce
1401 Constitution Avenue NW Room 4701
Washington D.C. 20230

Ref: Further Notice of Inquiry on the IANA Functions

The Latin America and Caribbean Federation of Internet and Electronic Commerce – eCOM-LAC, welcomes this opportunity to comment on the Further Notice of Enquiry on the Internet Assigned Numbers Authority (IANA) functions, issued by the National Telecommunications and Information Administration of the U.S. Department of Commerce (Docket N° 110207099-1319-02)

Our Federation is convinced that the global public interest is best served if the management of the IANA functions could evolve from being subject to Government oversight contractual responsibility, to that of a multistakeholder independent entity. In that context, we consider that ICANN is the obvious choice to fulfill such a responsibility.

There has been a distinct improvement in the performance of the IANA functions, and of course ICANN itself has proven itself as an impressive global forum, where stakeholders from all walks of society (including Governments through the GAC), contribute to the evolution and innovations pertaining to the Internet critical resources, in a transparent, bottom-up proceedings environment.

eCOM-LAC agrees that the preservation of a stable and secure Internet DNS, and management of IP addresses, is a matter of top priority for all stakeholders and the IANA function is of extreme importance to this effect. We also support the continuity of having IANA's three core functions bundled.

Perhaps a public consultation would be appropriate in order to transition the .INT TLD.

The question of "Compliance with national laws" (VI), would seem to be an undue obligation for the IANA contractor, which may well create more problems than it's intended solutions.

With regards to the "Documentation requirements for new gTLDs" (VII), we struggle to find justification for such an imposition. Having been part of the six-year process which developed successive iterations of the Applicant Guide Book for new gTLDs, we cannot see any justification for this. Paragraph C.2.2.1.3.2. of the draft SOW states: *"For delegation requests for new generic TLDs (gTLDs) the contractor shall include documentation to demonstrate how the proposed string has received consensus support from relevant stakeholders and is supported by the global public interest"* Surely if a new gTLD application runs the gauntlet of the evaluation and approval process as outlined in the AGB,

and comes out of it with a seal of approval, then no further checking procedures could in any way be justified?

The global Internet community has had ample occasion to participate in the development of the new gTLD programme, and the intervention of Governments in these proceedings was more than noticeable in recent months. This does not require any further checkpoints, once approval to an applicant has been granted.

In closing we reaffirm our preference that the IANA function not deviate from it's technical mandate, to become involved in verifications or become entangled in national regulatory compliance issues.

Yours truly



Oscar Messano
President