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Re: Further Notice of Inquiry on the Internet Assigned Numbers Authority Functions

CNNIC welcomes the National Telecommunications and Information Administration (NTIA) Further Notice of Inquiry (FNOI) on the IANA functions, and thanks NTIA for referring CNNIC's comments¹ on the last NOI. CNNIC appreciates the progress made by the NTIA of involving more stakeholders in the IANA functions, and the NTIA's effort reflected in the SOW draft on carefully considering and understanding comments from global Internet stakeholders.

However, CNNIC would kindly remind the fact again that development and evolution of the global Internet comes from collaborative organization and negotiation among global stakeholders, and the use and management of the Internet should be guaranteed for the benefit of people throughout the whole world. The IANA functions are clearly crucial for the global Internet, thus requiring more involvement of all stakeholders.

1. Does the language in "Provision C.1.3" capture views on how the relevant stakeholders as sources of the policies and procedures should be referenced in the next IANA functions contract. If not, please propose specific language to capture commenters' views.

CNNIC shares the acknowledgement that data submitted by applicants in connection with the IANA functions is confidential information, and thus supports "Provision C.1.3" which well defines the obligation of the Contractor in terms of data protection.

2. Does the new "Provision C.2.2.1.1" adequately address concerns that the IANA functions contractor should refrain from developing policies related to the IANA functions? If not, please provide detailed comments and specific suggestions for improving the language.

¹ See China Internet Network Information Center (CNNIC) Comments at (March 31, 2011), <http://www.ntia.doc.gov/comments/110207099-1099-01/comment.cfm?e=3A835CB9-68ED-4ABF-A376-7A4FF0F430A6>

CNNIC asserts that development of policies and procedures regarding delegation and redelegation should comprehensively involve all multiple-stakeholders. Therefore, CNNIC supports the intention of the “C.2.2.1.1” which aims at separating policy development from the performance of the IANA functions; but on the other hand, CNNIC would like to further encourage that the “C.2.2.1.1” should define and clarify a well-defined multiple-stakeholder model of policy development.

CNNIC has noticed that section C.2.2 intends to permit the Contractor to collect fees for the performance of the IANA function in future SOW. CNNIC strongly suggest keeping the voluntary contribution model.

3. Does the language in “Provisions C.2.2.1.2, C.2.2.1.3, C.2.2.1.4, and C.2.2.1.5” adequately address concerns that the IANA functions contractor should perform these services in a manner that best serves the relevant stakeholders? If not, please propose detailed alternative language.

CNNIC continually supports the adoption of performance standards and metrics as essential mechanism to guarantee satisfactory effectiveness of the IANA functions. Particularly, CNNIC welcomes “C.2.2.1.3” which defines that the Contractor should ask relevant stakeholders for approval when developing performance standards and metrics.

However, with increasing number of comments pointing out that transparency and accountability should be essentially improved, CNNIC encourages NTIA that performance standards, metrics and reports should be made public in order to involve more relevant stakeholders into collaboration with the NTIA. In the long term, CNNIC together with other relevant stakeholders urges more practical progress to transform the current DOC-supervising-only model into a complete independent multiple stakeholder model.

4. Does the language in “Provision C.2.2.1.3” adequately address concerns related to root zone management? If not, please suggest detailed alternative language. Are the timeframes for implementation reasonable?

CNNIC has noticed that the Contractor is required to make collaboration with relevant stakeholders in terms of root management. CNNIC welcomes the progress and expects more change in the future.

However, CNNIC, as a national registry together with many other ccTLD registries in the similar circumstances, should point out the principle that delegation and management of ccTLDs is in scope of sovereignty concerns. This principle has been recognized by the U.S. government in its 2005 Principles on the Internet’s Domain Name and Addressing System that “The United States recognizes that governments have legitimate public policy and sovereignty concerns with respect to the management of their ccTLDs.” Therefore, CNNIC urges that IANA functions should be performed independently without interference of the DOC, and any change of root zones relating to ccTLDs should be discussed and handled between IANA and those ccTLD registries.

5. *Does the new “Provision C.2.2.1.3.2 Responsibility and Respect for Stakeholders” adequately address concerns related to the root zone management process in particular how the IANA functions contractor should document its decision making with respect to relevant national laws of the jurisdiction which the TLD registry serves, how the TLD reflects community consensus among relevant stakeholders and/or is supported by the global public interest. If not, please provide detailed suggestions for capturing concerns. Are the timeframes for implementation reasonable?*

CNNIC has noticed the effort reflected in section C.2.2.1.3.2 that the IANA work should bring more respect to all stakeholders in the Internet community, and CNNIC expects more collaboration between the Contractor and relevant stakeholders, with respect to relevant national or local laws.

6. *Does the new “Section C.3 Security Requirements” adequately address concerns that the IANA functions contractor has a secure communications system for communicating with service recipients? If not, how can the language be improved? Is the timeframe for implementation reasonable?*

CNNIC shares the same goal of ensuring a more secure and stable operation of the DNS, root zone management, and execution of IANA functions. In general, CNNIC supports the requirements of adopting state-of-the-art practices in terms of security and stability, but applying specific global technical solutions is not only a technical issue but also a matter of global collaboration among all stakeholders.

Security and stability of the global internet requires involvement of global stakeholders, CNNIC suggests that the security issues raised in C3.3, C3.4 and C3.5 should be discussed and addressed among all relevant stakeholders and institutions. In particular, CNNIC is strongly concerned about the necessity of designating the COTR. If it turns out necessary, CNNIC suggests that the COTR should be elected and approved by all relevant stakeholders.

7. *Does the new “Provision C.2.2.1.3.5 Customer Service Complaint Resolution Process” provide an adequate means of addressing customer complaints? Does the new language provide adequate guidance to the IANA functions contractor on how to develop a customer complaint resolution? If not, please provide detailed comments and suggestions for improving the language.*

CNNIC welcomes the introduction of the “Customer Service Complaint Resolution Process”.

8. *Does the new “Provision C.3.6 Contingency and Continuity of Operations Plan (CCOP)” adequately address concerns regarding contingency planning and emergency recovery? If not, please provide detailed comments and suggestions for improving the language. Are the timeframes for implementation reasonable?*

CNNIC supports the CCOP in general, which aims at contingency planning and emergency

recovery. CNNIC has noticed that the Contractor is required to deliver the CCOP to the U.S. government annually. However, in order to increase transparency and accountability, CNNIC suggests that it would be better to deliver or publish the CCOP to all related stakeholders.

9. Does the new “Section C.4 Performance Standards Metric Requirements” adequately address concerns regarding transparency in root zone management process, and performance standards and metrics? Should the contractor be required to gather and report on statistics regarding global IPv6 and DNSSEC deployment? If so, how should this requirement be reflected in the SOW? What statistics should be gathered and made public?

CNNIC welcomes the introduction of Section C.4 in general, which explicitly defines performance metric requirements for the root zone management. However, CNNIC has noticed that only the Contractor, NTIA and Verisign are involved in the development of root zone management dashboard. Since root zone is crucial for all global Internet stakeholders, CNNIC again suggests that all relevant stakeholders should be invited when addressing root zone related issues.

About CNNIC

Founded in 1997, China Internet Network Information Center (CNNIC), a non-profit organization, assumes the responsibility of “.CN” and “.中国/.中國” ccTLDs registry and other services for the development of the Internet in China, which are authorized by Chinese government. CNNIC is also an active participant in the global Internet community, helping to shape the global Internet policy making process for the sake of Chinese Internet users.

Sincerely,



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