

## **Response by the Canadian Internet Registration Authority to the National Telecommunications and Information Administration (NTIA) Request for Comments on the Internet Assigned Numbers Authority (IANA) Functions**

**March 31, 2011**

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The Canadian Internet Registration Authority (CIRA) is the not-for-profit corporation responsible for operating the .CA country code top level domain. CIRA is a member of ICANN's country code Name Supporting Organization (ccNSO), a member of the Council of European National Top Level Domain Name Registries (CENTR), and a member of the Internet Society (ISOC). CIRA is pleased to have the opportunity to provide comments on the NTIA's Request for Comment.

Prior to responding to NTIA's detailed questions, CIRA would first like to comment on the current practice of issuing short-term Internet Assigned Numbers Authority (IANA) functions contracts. The IANA functions are at the very root of the stability of the Internet, and a more consistent, predictable relationship between the U.S. government and the IANA functions operator would be conducive to promoting that stability. While the relationship could evolve in many ways, awarding the contract on a longer-term basis may introduce a greater degree of certainty in the system.

As well, CIRA wishes to make the general comment that the existing framework for managing the IANA functions permits the IANA functions to remain technical and be free from political or economic considerations. CIRA, as a ccTLD and DNS operator, supports this framework, and does not support reform of the framework without appropriate consultation and caution.

### **Detailed Questions**

1. The IANA functions have been viewed historically as a set of interdependent technical functions and accordingly performed together by a single entity. In light of technology changes and market developments, should the IANA functions continue to be treated as interdependent? For example, does the coordination of the assignment of technical protocol parameters need to be done by the same entity that administers certain responsibilities associated with root zone management? Please provide specific information to support why or why not, taking into account security and stability issues.

CIRA believes that at present there is insufficient evidence that splitting of the IANA functions would enhance the performance of the functions.

2. The performance of the IANA functions often relies upon the policies and procedures developed by a variety of entities within the Internet technical community such as the IETF, the RIRs and ccTLD operators. Should the IANA functions contract include references to these entities, the policies they develop and instructions that the contract or follow the policies? Please provide specific information as to why or why not. If yes, please provide language you believe accurately captures these relationships.

To date, and in reference specifically to the Delegation and Redelelegation Working Group report to the ccNSO<sup>1</sup>, the predictability and consistency of IANA decisions have not always been sufficient. This concerns CIRA, as predictability and consistency in decisions which affect ccTLDs is paramount to maintaining a secure and stable Internet. Therefore, CIRA agrees that the contract with the IANA functions operator should refer to ccTLDs and the ccNSO, along with the other relevant policy and procedure development bodies, in order to ensure accountability to those who not only develop the policies but also rely on the proper execution of those policies and procedures.

3. Cognizant of concerns previously raised by some governments and ccTLD operators and the need to ensure the stability of and security of the DNS, are there changes that could be made to how root zone management requests for ccTLDs are processed? Please provide specific information as to why or why not. If yes, please provide specific suggestions.

CIRA would welcome the automation of processes relating to IANA's root zone management.

4. Broad performance metrics and reporting are currently required under the contract. Are the current metrics and reporting requirements sufficient? Please provide specific information as to why or why not. If not, what specific changes should be made.

CIRA does not have a comment on the IANA performance metrics and reporting at this time.

5. Can process improvements or performance enhancements be made to the IANA functions contract to better reflect the needs of users of the IANA functions to

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<sup>1</sup> <http://ccnso.icann.org/workinggroups/final-report-drd-wg-17feb11-en.pdf>  
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improve the overall customer experience? Should mechanisms be employed to provide formalized user input and/or feedback, outreach and coordination with the users of the IANA functions? Is additional information related to the performance and administration of the IANA functions needed in the interest of more transparency? Please provide specific information as to why or why not. If yes, please provide specific suggestions.

We believe that the automation of processes and improved documentation will increase transparency, predictability and consistency.

6. Should additional security considerations and/or enhancements be factored into requirements for the performance of the IANA functions? Please provide specific information as to why or why not. If additional security considerations should be included, please provide specific suggestions.

We support security requirements remaining flexible in order to facilitate the ability of IANA and its stakeholders to respond to rapid changes in the nature, sophistication and frequency of security threats. However, better authentication of change requests would promote the objective of ensuring the secure and stable operation of the DNS.

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