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**RE: Request for Comments on the Internet Assigned Numbers Authority Functions**

China Internet Network Information Center (CNNIC) welcomes the National Telecommunications and Information Administration (NTIA) request for public comment on the Internet Assigned Numbers Authority (IANA) functions. CNNIC appreciates NTIA's commitment to preserving the security and stability of the Internet DNS. In the meantime, we would like to emphasize that the security and stability of the DNS are shared responsibility among all stakeholders in the Internet community, which CNNIC thinks is yet properly incorporated in the management of the IANA functions. In this context, CNNIC would suggest that the future management of IANA functions reflect the smooth operation of IANA and reflect the interests of multi-stakeholders in the Internet community.

Specifically, CNNIC would like to make comment on the questions raised in the NTIA's NOI,

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.

Generally, CNNIC doesn't think it's necessary to separate the IANA functions except for running a root server by IANA itself. CNNIC would suggest any separation of IANA functions take into consideration the stability and smooth operation 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 contractor follow the policies? Please provide specific information as to why or why not. If yes, please provide language you believe accurately captures these relationships.

CNNIC thinks IANA contract should include references to ccTLD operators for advice with regard to the ccTLD management principles and guidelines on IANA performance. Similarly, it is also advised that other performance of IANA functions consult with other proper entities to meet the demand of other stakeholders.

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.

CNNIC submitted its IDN ccTLD application last year, and the request process took two distinctive processes within ICANN and IANA. While the ICANN process is relatively clear and transparent, the IANA delegation process isn't clear and well-defined, which made CNNIC made a strenuous effort to meet the requirement. Based on this experience, CNNIC suggests the IANA process optimized to ease the burden with regard to the change of the request of ccTLDs. Moreover, it is also suggested the approval process by DOC be removed in the IANA process when change of request is submitted by ccTLDs to reflect the fact that the ccTLDs are to serve local community of the nation. The change of root zones should be maintained by IANA itself completely without involving DOC and Verisign.

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?

The reporting should be public, and the best multi-stakeholder model is to change the DOC-supervising-only model, and make IANA to be a real independent organization or run by an independent organization, which is supervised by the global Internet communities themselves.

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 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.

Current IANA contract failed to include Service Level Agreement (SLA) in its service to the whole Internet community. In order to better serve the Internet community and to protect the stability and security of the Internet, it is highly recommended that SLA be introduced in the IANA management and the performance of IANA be published in a transparent and timely manner.

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.

IANA should strengthen the multi-stakeholder model, and ensure all the root server operators to follow the policies and instructions that are developed by the community. Of course, as a neutral organization, it's not necessary for IANA to operate a root server by itself.

#### **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,



Xiaodong LEE  
Deputy Director General and Chief Technology Officer, CNNIC