



Association Française pour le Nommage Internet en Coopération  
chargée de la gestion des noms de domaine en *.fr* et *.re*

St Quentin en Yvelines, 31st March 2011

## **AFNIC comments on the Internet Assigned Number Authority function**

AFNIC is the manager of French country-code top level domains *.fr*, *.re*, *.tf*, *.wf*, *.pm* and *.yt*. We are a not-for-profit, multistakeholder organisation founded in 1997.

AFNIC is a member of ccNSO and a founding member of CENTR, the European regional organisation of ccTLDs gathering 57 ccTLD managers.

AFNIC has also been involved in the development of responses from CENTR which we strongly endorse.

### ***a. IANA is part of a wider root zone management system***

On a general level, we are grateful to the Department of Commerce to allow us to provide input on the IANA function, a key technical function for the Internet. We believe it is part of our mission to the French and global community to contribute to the enhancements of this function.

Before responding to the questions of the NoI we note that the IANA function, with regards to the management of the domain name system (DNS) root, is just part of a wider root management system comprised of IANA, the DoC and Verisign, acting as the root zone publisher. We believe it is highly important for the global trust in the Internet that the same openness, accountability and transparency principles studied below for IANA be also applied to the other parts of the root management system. We stand ready to contribute to further NoIs on these aspects.

### ***b. Transparency, accountability and the opportunity to introduce an IANA version of the “Affirmation of Commitments”***

We also took note of ICANN’s submission to the present NoI, asking the DoC to modify the legal nature of the IANA contract, taking the example of the AoC. We strongly support the suggestion to introduce in any future IANA contract additional transparency and accountability mechanisms. While the quality of service has significantly improved in the past few years, transparency of costs, or of motivation for denied requests are not yet provided. As discussed below, accountability also remains quite low since there is no appeal mechanism.

But we believe these conditions are prerequisites to be fulfilled before any significant change in the legal framework is undertaken. The example of the AoC demonstrates how difficult it can be to introduce additional transparency and accountability measures within an organisation. We believe the example pleads for caution.

### ***c. Comments on specific 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.*

While it is clearly feasible to separate these functions, we can not see at this stage any significant reason to do so for the interest of the public.

The advantages gained by splitting the IANA functions to different organisations are currently unclear and there is a risk that any such split would lead to increased costs and complexity.

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.*

References to IETF are obviously needed with regards to technical parameters (ports, codes, types). References to RIRs and their common policies (NRO) are recommended for IP address and ASN management. More generally, references to other potential parties involved in the standardization or the management processes associated with the assigned numbers covered by IANA function are encouraged, as IANA should keep its focus on the technical aspects.

As far as domain names are concerned, reference to both the ccTLD operators and the policies they develop is to be recommended. The IANA contractor should be expected to respond to decisions on ccTLDs that are, in most cases, made through nationally-developed processes: This is in line with the US Government's commitment in the "U.S. Principles on the Internet's Domain Name and Addressing System" and in its support for the WSIS Tunis Agenda.

Such policies should be elaborated through open and transparent processes, taking into account that the service is delivered all across the world, and the multiple relevant stakeholders. The ccNSO, which initiated a working group recently on these issues, seems a good starting point.

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.*

The automation of the IANA root zone management function would address many of the shortcomings of the current process and it is therefore our strong belief that the early implementation of the automation project should get the highest priority. The European ccTLD community has in the past contributed significantly (both financially and in terms of expertise) to the project and is looking forward to its deployment. We also believe that the additional requests related to the roll-out of DNSSEC across the world could lead to significant overload (hence additional arbitrary delays) on the system without the automation.

The outcome of the survey that was held amongst CENTR Members from 11 March 2011 until 18 March 2011. 21 Members provides an appropriate basis for identifying areas of improvement.

In addition, we recommend to introduce the possibility for a ccTLD to appeal a decision by the IANA contractor, in case the decision does not follow existing and documented policies. Such appeal should not be internal to the contractor.

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 current metrics provide a sufficiently detailed perspective on IANA's overall performance. However, there is currently no transparency on budget costs, let alone costs related to specific aspects of the IANA function, ie domain name requests. This lack of transparency should be addressed quickly.

We also suggest that – in cooperation with the ccTLD community – IANA develops a Service Level Agreement for its root zone management function. This Service Level Agreement should include framework parameters and timelines. These service levels should also be accompanied by detailed documentation that explain the root zone management function (and when implemented the eIANA interface) and should be made available in the UN languages.

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.*

As mentioned in the response to question 4, CENTR encourages the drafting of detailed documentation. In addition we believe that the development of a “Framework of Interpretation” for the delegation and redelegation of ccTLDs will help significantly to make the process more transparent.

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.*

The implementation of eIANA is expected to increase the level of security and stability of the root zone management function. In particular the communication and identification processes should benefit from the new interface. Using commonly available tools for signing (and the validation of signatures) is believed to sufficiently guarantee proper security for this process.

Care should be taken however, that these processes do not obstruct the efficient and effective interaction in case of emergency.

Mathieu Weill,  
CEO

A handwritten signature in black ink, consisting of several overlapping, sweeping lines that form a stylized, abstract shape. The signature is positioned below the printed name and title.