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Response by the Government of Egypt to the Department of Commerce – National Telecommunications and Information Administration [Docket No. 110207099–1099–01] RIN 0660–XA23: Request for Comments on the Internet Assigned Numbers Authority (IANA) Functions

General Views:

- Egypt welcomes the opportunity provided by the National Telecommunications and Information Administration (NTIA) to submit comments on the Internet Assigned Numbers Authority (IANA) functions which are fundamental public functions that serve the global Internet community around the world.
- Egypt supports that the Internet Corporation for Assigned Names and Numbers (ICANN) continue to perform the IANA functions and believes that the ICANN model, through its bottom up process and the involvement of all stakeholders, is the right place for discussing improvements of the IANA functions rather than through a contract between ICANN and an individual government.
- Egypt believes that the IANA functions could be enhanced through more transparency and through accountability to the whole community which could be significantly improved by removing (or at least narrowing the scope of) a unilateral contractual oversight; consequently providing more flexibility and responsiveness of ICANN in accordance with a constantly evolving Internet.

- The Affirmation of Commitments (AoC) had given ICANN more independence as compared to the Joint Project Agreement (JPA). Egypt suggests that a similar approach be followed for the IANA contract; i.e. changing the contract to a long-term high level framework where the whole community could take part in its reviewing. In this context, Egypt also suggests a review process on improvements of the IANA functions in terms of transparency, accountability and performance similar to the review done by the AoC Accountability and Transparency Review Team (ATRT) and other reviews which are being implemented by the community in the context of the AoC.
- Egypt believes that the IANA is currently more of an isolated black box within ICANN. It is unclear how agreed policies affect or are reflected into the IANA functions. It's unclear how GAC principles are reflected into the IANA delegation and re-delegation process. Furthermore Egypt believes that the IANA delegation and re-delegation process did not integrate smoothly with the IDNs Fast Track process which was agreed upon by all the different stakeholders within ICANN's Supporting Organizations and Advisory Committees (SOs/ACs).

Answers to Questions:

*Q1. "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."*

There is no clear advantage of splitting the IANA functions across different organizations. On the contrary, there might be a risk of lack of performance, lack of coordination and delays. Yet technical functions under the current contract may not necessarily be included under the new agreement. For example functions such as the management of .arpa or the protocol parameters can be taken under a separate agreement between ICANN and IETF/IAB.

*Q2. "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."*

Entities within the Internet technical community such as the IETF, the RIRs and ccTLDs should maintain a direct relationship with the IANA. The referencing of those entities in the IANA functions contract would further recognize the importance of their roles yet this referencing should refrain from getting into details that would result in a rigid agreement limiting the flexibility of the nature of those direct relationships.

*Q3. "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 fact that the final approval is being sought from NTIA/DoC negatively affects the responsiveness, predictability, transparency and accountability of the process. As long as the ICANN Board is not the ultimate decision-making body, they will not be able to respond in a timely manner with accurate information which also reflects on the way the IANA works. It is hence suggested that the ICANN Board should be empowered to make decisions with regard to delegations and re-delegations as well as root zone changes.

On another note, changes with respect to how root zone management requests for ccTLDs are processed should take into consideration the results of the work of the ccNSO Delegation, Re-delegation and Retirement Working Group<sup>1</sup>.

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<sup>1</sup> <http://ccnso.icann.org/workinggroups/final-report-drd-wg-17feb11-en.pdf>

*Q4. "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?"*

As a step towards more transparency and apart from any requests or data that are requested to be kept confidential, all metrics and reporting should be made public. Evaluation and improvements, if necessary, can hence be done in consultation with the broader community and on regular basis.

*Q5. "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."*

In this context, Egypt suggests a review process on improvements and enhancements of the IANA functions in terms of transparency, accountability and performance similar to the AoC ATRT review and other reviews which are being implemented by the community in the context of the AoC.

*Q6. "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."*

Security considerations should be factored into the performance of the IANA functions and should continuously be made up-to-date. Hence, from a contract point of view, this cannot be specified in details but rather mentioned as a general principle.

Best Regards,

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Egypt