



March 31, 2011

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1401 Constitution Avenue, NW
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Re: NTIA Notice of Inquiry, Request for Comments on the Internet Assigned Numbers Authority (IANA) Functions

The United States Council for International Business (USCIB) appreciates the opportunity to provide input to the U.S. Department of Commerce to inform the procurement process leading to the award of a new IANA functions contract. Our members include some 300 leading U.S.-based global companies and professional services firms from every sector of our economy, with operations in every region of the world. The technical coordination of Internet resources and preservation of a unified Domain Name System (DNS) is of critical importance to all of our members given the amount of their business that is conducted over it.

USCIB recognizes the importance of the IANA functions contract, and USCIB applauds NTIA for seeking ways to enhance the performance of the IANA functions. We also recognize the requisite cooperation and coordination that the IANA functions require between a variety of technical groups and stakeholder communities. Understanding the best way to structure the IANA functions contract in order to ensure the continued security and stability of the DNS is critical to continued innovation and growth of the Internet. We offer the following two key considerations in evaluating the IANA functions contract.

The continued interdependence of the IANA functions

At the general level regarding the procurement process and contract, USCIB supports the current model of contracting the interdependent IANA functions to a single entity. We believe the current IANA Functions Operator, Administrator, and Root Zone Maintainer have performed their duties well over the course of the last IANA functions contract, as have the entities and organizations involved in processes directly affiliated with the IANA functions. We support continuation of these organizations' respective roles.

The IANA functions themselves remain interdependent and should be treated as such, with coordination under the same model that has governed the IANA functions contract in the past. This model has demonstrated itself as robust and flexible enough to respond to threats. The implementation of DNSSEC is an example of such positive coordination. Furthermore, any

segmentation of the current administrative and technical coordination model raises significant issues and potential challenges, including the operational, administrative, policy, political and management considerations. In our view, the potential benefits of any significant changes do not outweigh the risks to the continued security and stability of the DNS.

Support for Continuation of the IANA Functions Process

According to the NOI, the IANA functions operator must retain “constructive working relationships with interested and affected parties if it is to ensure quality performance of the IANA functions. Applicable to each of these functions and their performance are relevant policies, technical standards, and procedures developed and administered outside the purview of the IANA functions contract.” USCIB supports ICANN in its role as the IANA functions operator, as it is currently the organization best equipped to manage the global coordination of the DNS in both technical coordination of IANA and policy development that impacts the DNS.

The transparency and effectiveness of the IANA functions process is relevant to the IANA contract in that it influences global perception of the current tripartite model governing the IANA functions. Some stakeholders have concerns about the current model. We support the current model, and feel that such concerns are best addressed by focusing on specific suggestions to enhance the transparency or the operation of the IANA functions process. This should be done within the existing model and contract framework.

Institutional confidence in ICANN generally will help to maintain support for the IANA functions process. Accordingly, ICANN must continue to improve its accountability and transparency to its various stakeholders. The recent Accountability and Transparency Review Team Report, mandated under the Affirmation of Commitments agreement between ICANN and the Department of Commerce, details a series of recommendations that ICANN should implement in short order. Doing so will improve ICANN’s functioning and bolster global community support for ICANN’s important role in ensuring the continued security and stability of the DNS, its respective role as the IANA functions operator, and the current contract model for IANA.

Furthermore, confidence in ICANN as both the functions operator for IANA and its policy development work is tied to its organizational expertise. We encourage ICANN to continue to maintain and develop its staffing, in line with its responsibilities under the IANA contract, as well as its obligations to ensure the security and stability of the DNS.

Conclusion

The renewal of the IANA contract and its execution are important to businesses worldwide, as well as the larger global Internet community. Within the context of the current model, NTIA

should seek ways to enhance accountability and transparency in both the IANA functions themselves, as well as the entities involved in IANA functions implementation, especially ICANN. The IANA functions contract should be renewed under the existing model in order to preserve stability and security, with accompanying improvements on aspects of transparency and accountability. Doing so is important to ensure the security and stability of the DNS, confidence in the current model of IANA, and continued growth of the Internet and its unprecedented and vital role as a global interactive platform.