



Hong Kong Internet  
Registration Corporation Limited  
香港互聯網註冊管理有限公司

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Fiona M. Alexander  
Associate Administrator  
Office of International Affairs  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W.  
Room 4701  
Washington, DC 20230  
[IANAFunctions@ntia.doc.gov](mailto:IANAFunctions@ntia.doc.gov)

**RE: Response from Hong Kong Internet Registration Corporation Limited (HKIRC) to NTIA Notice of Inquiry (NOI) on the IANA functions**

### About HKIRC

Hong Kong Internet Registration Corporation Limited (HKIRC) is a non-profit-distributing and non-statutory corporation designated by the Government of the Hong Kong Special Administrative Region to administer the registration of Internet domain names under .hk and .香港 country-code top level domains (ccTLD). We are the designated manager of the ccTLD .hk and internationalised country-code top level domain (IDN ccTLD) .香港 as recorded in the IANA root zone database.

### Comments

HKIRC welcomes the opportunity to provide comments in response to the National Telecommunications and Information Administration's (NTIA's) Notice of Inquiry on the IANA functions. HKIRC shares and supports NTIA's commitment to preserving the security and stability of the Internet DNS. At the same time, we echo NTIA's view that the security and stability of the DNS are shared responsibility among all stakeholders in the Internet community. Nevertheless, we are of the view that the topic of reform and possible separation of IANA functions should be approached with caution and stakeholder-wide consultation, in order to avoid unintended fragmentation and disruption of the current services.

HKIRC's specific replies to the questions posted in the NoI are as below:

*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.*

HKIRC sees no merit of splitting the technical functions of the IANA. Having a single entity performing the IANA functions avoids the over-complication of the process and the need to coordinate with multiple parties. Furthermore, the IANA has been a pivotal part of the ICANN and HKIRC appreciates the efficient use of resources and better communications made possible by having a single entity to perform a range of interdependent technical functions. We would advise NTIA to fully consider the pros and cons of any structural changes and consult the stakeholders involved including those outside ICANN.

*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.*

HKIRC supports the multi-stakeholder approach advocated by the ICANN. The fact remains true that IANA is an entity performing technical functions whereas policies are developed elsewhere amongst and by stakeholders under the context of ICANN, IETF and others. Naturally, references ought to be made to the policies developed by the community including ccTLD managers, ccNSO, IETF, and RIRs in the IANA functions contract. HKIRC opines that the working relationship between IANA as a purely technical administrator and different stakeholders as policy developers should remain *status quo*.

In particular, the ccNSO has developed the policy for the IDN ccTLD Fast-track process and

reviewed the policy related to the delegation, redelegation and retirement of ccTLDs. The policy work already completed provides a sound and comprehensive basis for IANA to implement and enhance the related technical functions,

*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.*

HKIRC found the services provided by IANA on root zone management to be satisfactory and up to the standard. With our previous applications for name server changes and recent application for the IDN ccTLD, IANA has been helpful and reasonably efficient. Considering the need to strike a balance between security and efficiency in managing the root zone, as well as the initiatives being undertaken to enhance the process, we do not have specific suggestions on changes at this stage. Any specific enhancement proposed should be tested to see whether they satisfy the following criteria - (a) the benefits will outweigh the costs and additional complexity and effort to be incurred, (b) the enhancement will have consideration on options for the more advanced ccTLDs which have more resources at their disposal as well as the smaller ccTLDs which may not have the technical knowhow or resources to implement more advanced technical functions or features.

*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?*

HKIRC found the current performance metrics and reporting of IANA to be adequate understanding that we are talking about a diverse ccTLD and gTLD community. There are always rooms for improvement, but caution should be exercised when considering adding performance metrics and reporting requirements as an overly complicated mechanism will lead to additional bureaucracy which may outweigh the benefits.

*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.*

HKIRC found that the current email-based communications and feedback channel with IANA administrators to be adequate, primarily because of the diversity in the size and level of technical knowhow and resources of the different ccTLD and gTLD registries in the domain name community. Reiterating our comments above, we do not see any critical shortfalls that require major overhaul of the systems or processes in place. Improvement for any process is worthwhile only when the benefits gained from the improvements outweigh the additional overhead incurred. Full automation of a process can be considered provided that security is not unduly undermined and that alternatives are available for the less technically sophisticated and equipped registries. Consultation of the community on any such changes is essential.

*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.*

HKIRC thinks that the security measures taken by the IANA are sufficient in respect of the most often used functions of the IANA. The requirement for making change requests by delegation contacts via recorded email addresses and the subsequent acknowledgement and confirmation together serve the purpose without undue complications. To enhance security, two-factor authentication of the more critical functions which have to be automated can be considered. However, options and alternatives should be made available for the smaller and less technically advanced ccTLD registries.

A handwritten signature in blue ink, consisting of a vertical stroke with a loop at the top and a horizontal stroke at the bottom.

Jonathan Shea  
Chief Executive Officer  
Hong Kong Internet Registration Corporation Ltd.  
[jonathan.shea@hkirc.hk](mailto:jonathan.shea@hkirc.hk)