

Regarding to Request for comment on Internet Assigned Numbers Authority Numbers (IANA) functions, on behalf of Internet Governance Capability Build Program 2011 (IGCBP 2011) would like to address comments, which are:

1. To response question number 1 “Whether the interdependent technical functions performed under the IANA should continue to be treated as interdependent, or if there should be changes to the present grouping? “

We suggest that IANA should become Interdependent organisation that free from the US Government’s intervene and ICANN group as well. IANA should stand by their own to keep on focus for IP Address management only. Our justification for this are:

- a. We all cannot deny the importance of the IANA functions as one of the foundational components of the Internet ecosystem thus it is vital to rely on the such Internet institutions in the Internet ecosystem to play appropriate roles where their expertise contributes to the smooth functioning of the Internet overall.
 - b. IP Address is very crucial resouces, so the management of IP Adress can’t exist under either a country power, or organisation who have profit/ money orientation. In fact, a group organisation such as ICANN has moved their interst to profit/ money orientation,, because by the time they have earned more money from registrys of new gTLD and ccTLD as well. As eveidance of this , when ICANN approve .XXX that can disturb stability of DNS easily as caused of blocking action of government who keep tight morality . On the other hand, the process of delegation and redelagation have became so complicated because many parties seem it as competition to earn more money, by neglecting the importance of management IP Address behind the ccTLD it self.
 - c. The interdependency calls for of one neutral body like IANA which acts as a liaison among IETF/IAB, ICANN, RIRs and other stakeholders. Simply put, IANAs role as a coordinating body is very essential for smooth operation of these technical bodies.
 - d. If IANA would become interdependent organisation, we would suggest that IANA funding should come from equal contribution of all countries by considering countries resources and ability. Besides, we accept the UN intervence to accomodate this process at the beginning, untill IANA fit enough to stand by their own way.
2. To response question number 2 “ Recognizing that other Internet technical organizations' policies (e.g., IETF, IAB, RIRs, ccTLDs) impact on the performance of the IANA functions, should those be referred to and specified in the IANA functions contract and how?

We suggest that if IANA would become interdependent organisation, they should make their own policies on IP Address management. As IANA will focus on technical aspect only, we support if IANA would be referred to IETF who known as technical organisation that have best policies for technique aspect. However, by the time they will run their own business, IANA should able to create own policies related to IP Address, root zone management.

3. To response question number 3 “ Should there be changes in the handling of root zone management requests pertaining to ccTLDs to address the concerns of some governments and ccTLD operators?

We suggest that if IANA would become interdepended organisation in term and condition that explained at point number 1, so IANA should handling and focus on stability of root management without any interest from a country or groups.

On the other hand, we emphasize that distribution of IP Address which is Top Level Domain (TLD) of countries and country code Top Level Domain (ccTLD) management, have to be treat by different way. Considering that ccTLD shouldn't be ran for profit/ money orientation. But it should put country's interest and stability at the top priority. We belive that it will become one of solution to breakthrough difficulties of process delegation and re-delegation of ccTLDs. Delegation or Re-delegation is not a chance to increase business aspect, otherwise to form a better management for IP Address of country's TLD and ccTLD as well.

4. To response question number 4 “Are the current performance metrics and reporting by the IANA functions operator adequate, or should there be changes?.

Regarding to this question IGCBP 2011 agreed that during the times of IANA existance, we don't see a transparency. All of us know that IANA has been treating countries by different way by giving special access to the US government. IANA always give annual report about traffic communication through IP address to The US governmnet only. So, as we ask for IANA should become Interdependent organisation, we would like to ask IANA apply “ The equal rights and equal responsibilities among all ocuntries in the world”. Somehow, we think every country should get the report of traffic communication through IP Address, to enable each country, each government to be aware of malfuction of IP address it self.

5. To response question number 5”Are there improvements that should be made to the IANA functions contract to better address the needs of users of the IANA functions? Here the NOI specifically asks if additional information on the performance and administration of the IANA function would make the process more transparent?

The answer for this question, we have explained in answers number 1, 2, 3, 4 above. In addition, efficiency should become another consideration, beside transparency.

6. To response question number 6 “Should additional security considerations or enhancements be included in the requirements in the IANA functions contract?”

We suggest that IANA functions information security plan should have a risk management to ensure the CIA of the IANA functions processes and information assets.