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National Telecommunications and Information Administration
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By electronic mail: IANAFunctions@ntia.doc.gov

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

Dear Ms Alexander,

The Internet Society is pleased to submit the following comments to the National Telecommunications and Information Administration process on the Internet Assigned Numbers Authority functions.

GENERAL COMMENTS

The Internet Society (ISOC) is a non-profit organisation founded in 1992 to provide leadership in Internet related standards, education and policy. We are dedicated to ensuring the open development, evolution and use of the Internet for the benefit of people throughout the world. Coming from this perspective, we feel it is important to preface our comments on the IANA functions by recalling that a common set of values and principles has characterized the development and operation of the global Internet since the beginning. In particular, open standards, freely accessible inclusive processes, and transparent governance are central to the Internet's management and ongoing evolution.

The Internet works precisely because all involved organizations work together collaboratively, respecting individual roles and in the public interest. This method of working is called the Internet model of development, and the diverse environment of stakeholders engaged in creating and developing the Internet is broadly known as the Internet ecosystem¹.

¹ <http://www.isoc.org/internet/issues/ecosystem.shtml>

The IANA functions are among the foundational components of the Internet ecosystem, and the IANA has developed over time as the administrator of some of the Internet's most vital shared resources, guided by policies established by other entities within the Internet ecosystem. The position of the IANA functions within the ecosystem is well described in the comments submitted in this process by the Internet Architecture Board, which are fully supported by the Internet Society.

For the Internet Society, it remains important for the IANA functions to continue to be a part of the Internet ecosystem, and that the IANA functions operator is permitted to continue its evolution toward becoming an internationally-accepted, private sector (i.e., multistakeholder) entity. This approach needs to be maintained and enhanced, as it is best suited to serving the global public interest.

Before responding to the NOI's specific questions, two general comments: if considering making any possible changes to the IANA functions contract, it will be important that those terms not be made overly specific. The Internet is in constant evolution, and will be so for the foreseeable future. The Internet Society recommends that the contract language should refer to desired outcomes rather than to specific methods or mechanisms, to avoid attempting to artificially shape the course of the Internet's evolution, which has at times taken surprising yet positive turns.

Secondly, the Internet Society consider that the current US government practice of issuing an ongoing series of relatively short-term IANA functions contracts is not a desirable way to implement the internationally-accepted private sector (i.e., multistakeholder) model. This practice introduces a degree of uncertainty into the system and thus a certain amount of instability. Thus, ISOC looks forward to seeing the relationship between the US government and the IANA functions operator, and the related legal instruments, evolve so as to demonstrate greater confidence in and commitment to the model.

SPECIFIC RESPONSES

QUESTION 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.

- The Internet Society view is that the IANA functions continue to be interdependent, and we would agree that it is important that they continue to be performed together by a single entity. If the functions were ever to be performed by a different entity, it would be important to build in sufficient time for all involved organizations external to IANA to prepare for the change and to react appropriately. We respectfully refer you to the submission from the IAB for specific examples of why the IANA functions should evolve together and be performed by a single entity.

QUESTION 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.

- The Internet Society believes it is vital to rely on the native Internet institutions in the Internet ecosystem to play appropriate roles where their expertise contributes to the smooth functioning of the Internet overall, including by providing the policy framework for the administration of the IANA functions.
- Thus, we think it is important that the roles of the IETF, IAB, RIRs, and ccTLD operators be recognized in the system. However, in doing so care must be taken that the way they are recognized does not expand the scope of IANA nor assert any authority over those organizations by any mechanism; e.g., “incorporation by reference.” For that reason, the most appropriate approach would likely be to include a general reference to the roles of the various entities involved, making reference to them only in the “Background” section of the contract.

QUESTION 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 Internet Society notes that the way requests for changes pertaining to ccTLD name-servers are handled will always be a sensitive area (whoever is in charge) because of the necessity to authenticate and validate the requests received which can involve governments, technical operators, the civil society, and business, sometimes in conflictual circumstances.
- In that respect, ISOC notes that significant and positive progress has been made by the ccNSO Delegation, Redefinition and Retirement Working Group in ICANN. The ccNSO has recommended continuing this work through a policy development process to develop policies for the retirement of ccTLDs and the development of a “framework of interpretation” for the delegation and re-delegation of ccTLDs. The framework is expected to provide guidance to IANA and the ICANN Board on interpretations of the current policies, guidelines and procedures relating to the delegation and re-delegation of ccTLDs.
- ISOC recommends against making changes in the contract pertaining to how root zone management requests for ccTLD operators are processed until the results of the ccNSO work are known.
- Finally, related to the response to question 5 below, the Internet Society recommends that there be more transparency and public reporting on the processing of requests related to ccTLDs.

QUESTION 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?

- We understand that the current contract requires the IANA functions operator to submit status reports and defined statistics to the NTIA in a monthly report but does not permit the operator to publish those reports publically. To be consistent with the evolving expectations of increased transparency and accountability for a broad range of Internet institutions, the Internet Society recommends that the current metrics and reports be made public as a matter of practice. If confidentiality is dictated, for example in the handling of a sensitive request, the public report should indicate that such a request is being handled, and the reason for confidentiality. Please see the answer to question 5, below, for additional detail.

QUESTION 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.

- The Internet Society believes there is an ongoing need to build international confidence in how the IANA function is operated and administered. That need can in part be addressed by making the IANA functions more open and transparent to the global community, and particularly to those entities engaged in setting policy or who are impacted by the IANA functions.
- Although this point may go beyond the specific remit of this proceeding, we recommend that more information related to the performance and administration of the IANA-related functions should be required from the IANA Functions Operator, the Administrator, and the Root Zone Maintainer. This will provide a more complete picture of the process and enhance the overall customer experience.
- Transparency would also be improved by establishing standardized operating procedures and maintaining transparent time lines for all parts of the process, accompanied by regular progress reports.
- The Internet Society recommends that a public process be commenced to invite comments from those who directly interface with the IANA functions operator to design appropriate mechanisms to ensure transparency, and to provide input on performance enhancements to reflect users' needs, to enhance customer service, and to recommend meaningful metrics and reporting mechanisms and timelines.
- ISOC believes that providing all interested parties with increased ability to see into the entire chain of IANA-related activities will greatly help to reassure those who are concerned about the degree of influence exerted over the IANA function by the government of the United States, and thus be good for the Internet overall.

QUESTION 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.

- We believe that the entity that performs the IANA functions should serve as an example to the Internet community by maintaining state-of-the-art best practices in the security and stability of its operations. However, in order to accommodate the constant evolution of the Internet, we do not believe it is appropriate to set overly specific security terms within the IANA functions contract. An overly specific approach to security may inadvertently lock in place a specific approach and may provide a disincentive to implement the most advanced solutions to enhance security and stability.

CONCLUSION

In conclusion, the Internet Society offers the following statement from its Board of Trustees, resulting from a recent discussion of how the IANA functions are currently being handled: "ISOC supports ICANN as the continuing operator of the joint IANA functions, and believes that the current stakeholder communities should remain in charge of the evolution of their relevant functions. For the IP address space, that is the Regional Internet Registries; for the protocol parameters, that is the Internet Architecture Board; for domain name evolution, that is the consultative committees and current operators."

For further information, please contact:

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About the Internet Society

The Internet Society (ISOC) is a non-profit organization founded in 1992 to provide leadership in Internet related standards, education, and policy. The Internet Society is the organizational home of the Internet Engineering Task Force, the Internet's premier technical standards body. With offices in Washington, D.C., and Geneva, Switzerland, it is dedicated to ensuring the open development, evolution, and use of the Internet for the benefit of people throughout the world. For more information see <http://InternetSociety.org>.