

Subject: Response to Request for Comments on the Internet Assigned Numbers Authority (IANA) Functions; National Telecommunications and Information Administration, Docket No. 110207099–1099–01, RIN 0660–XA23; published in the Federal Register /Vol. 76, No. 38 / Friday, February 25, 2011, page 10569

The International Telecommunication Union (ITU) provides comments related to the performance of the IANA functions, with respect to “*other services related to the management of [...] .INT top-level domains*” listed in NTIA’s Notice of Inquiry document. This topic is of particular interest to the United Nations family and our comment reflects agreements reached within that family.

Proposal: Any future IANA contract should specify that the manager of the .INT top-level domain name implement the provisions of Recommendation ITU-T E.910.

This Recommendation clarifies (a) the principles and procedures for the registration of names under the Internet top-level domain name “.INT” and (b) the process by which qualified international organizations can register for domain names under “.INT”.

An international organization, as defined in this Recommendation, "may be created by a treaty or other agreement (resolution, etc.) among international juridical persons". The United Nations (UN) family, composed of such intergovernmental treaty organizations (e.g. ITU, WIPO) has an interest in preserving its appropriate presence and identity on the Internet under the .INT top-level domain, in line with its special status and requirements. In this regard, the UN family has endorsed the provisions in Recommendation ITU-T E.910 related to the management of .INT top-level domain.

1. ITU provides its comments on the management of .INT top-level domain in the spirit of developing greater collaboration and cooperation with relevant organizations involved in the development of IP-based networks and the *future internet*

ITU is the leading UN agency for information and communication technology (ICT) issues, and the global focal point for governments and the private sector in developing telecommunications/ICT networks and services. ITU membership includes 192 governments and more than 700 private sector entities.

The 2010 ITU Plenipotentiary Conference in Guadalajara, Mexico adopted a revision of its Resolution 102 (on ITU's role with regard to international public policy issues pertaining to the Internet and the management of Internet resources, including domain names and addresses), which, inter alia, resolves to *explore ways and means for greater collaboration and coordination between ITU and relevant organizations¹ involved in the development of IP-based networks and the future internet, through cooperation agreements, as appropriate, in order to increase the role of ITU in Internet governance so as to ensure maximum benefits to the global community.*

Through Resolution 102 (Rev. Guadalajara, 2010) the ITU Plenipotentiary Conference further recognizes ITU’s significant effort on .INT top-level domain.

¹ Including, but not limited to, ICANN, the RIRs, IETF, ISOC and W3C on the basis of reciprocity

It is in this spirit of seeking greater collaboration and cooperation that ITU provides its comments regarding the management of .INT top-level domain.

2. ITU membership endorsed the provisions of Recommendation ITU-T E.910 on *Procedures for registration within the domain name .INT*, following extensive consultation with other UN agencies and International Organizations as well as ICANN

Recommendation ITU-T E.910 clarifies (a) the principles and procedures for the registration of names under .INT top-level domain and (b) the process by which qualified international organizations can register for domain names under .INT. The Recommendation is publicly available on the ITU web site at: <http://www.itu.int/rec/T-REC-E.910-200512-I>

The process to develop this Recommendation started in 2002. Following up on complaints from international organizations - that (a) the rules currently applied for the domain .INT do not meet their requirements (for example, it is not possible for WIPO to obtain the domain name “ompi.int” corresponding to the French-language acronym of its name) (b) there are several domain name registrations under .INT for organizations that are not even treaty organizations² - the 2002 ITU Plenipotentiary Conference instructed the Director of ITU Telecommunication Standardized Bureau to work with Member States and Sector Members, recognizing the activities of other appropriate entities, to develop a Recommendation to clarify the management of the domain “.INT”.

Recommendation ITU-T E.910 was approved in December 2005 by ITU-T (Telecommunication Standardized Bureau) Study Group 2 (2005-2008) under the World Telecommunication Standardization Assembly (WTSA), which establishes the topics for study by the ITU-T Study Groups and who, in turn, produce Recommendations on these topics.

The Recommendation garnered a high degree of consensus, following extensive consultations with UN agencies, other intergovernmental/international organizations, and as well as others in the Internet technical community. Representatives of ICANN, including its then President and Chief Executive Officer, were invited to participate in the development of the Recommendation and indeed did participate and provide comments.

3. Work on Recommendation ITU-T E.910 has been formally endorsed by the heads of agencies of the United Nations system.

The UN System ICT Network, at its third meeting in May 2004, agreed that it would support all measures that would protect the interest of the UN family, including the “.INT” domain management, and it adopted the following decision (Decision 10 in CEB/2004/HLCM /16).

“The ICT Network endorses the position expressed by IAEA and UNFCCC (in ITU-T Study Group 2 TD 174) on the proposed revised text for draft Recommendation E.int concerning Management of the .INT domain. The organizations of the UN System expressed particular concern for their requirement that the name of an organization may be registered in all official

² Currently, www.tpc.int or <http://www-usa.tpc.int/sendfax.html> is being used for The Phone Company’s Remote Printing Service. (accessed on 16 March, 2011)

languages and the need for registration of institutions, programmes and subsidiary organizations that may be established by the treaty organization.”

Then, the UN System High-Level Committee on Management (HLCM) of the Chief Executive Board for Coordination (CEB) endorsed the above decision (CEB/2004/HLCM/16), and made the following additional statement:

“The HLCM believes that the operation of the domain “.INT” should be confided to an organization that agrees to comply with the UN’s requirements and recommends that the ITU be given the task to identify such an organization and to take the steps required to ensure that the identified organization complies with the requirements.”

4. Despite global approval and endorsement, Recommendation ITU-T E.910 has yet to be implemented

Following its approval in 2005, ITU communicated Recommendation ITU-T E.910 to ICANN (which currently manages the IANA functions). ICANN in its response dated 6 May 2006 stated it would consider implementing the provisions of the Recommendations following ICANN procedures consistent with transparency and public consultation and consultation with appropriate parties. However, no public consultations were undertaken regarding this important matter, ICANN did not consult ITU, no further communication was received from ICANN, and no acknowledgement was sent by ICANN in response to the various requests detailed below. A record of the activities regarding this matter can be found under the following links:

- a) September 2003 workshop to develop a Recommendation to clarify the management of “.INT” (co-chaired by the then-President of ICANN): <http://www.itu.int/ITU-T/worksem/int/index.html>
- b) January 2006 letter to ICANN and May 2006 reply from ICANN: <http://www.itu.int/md/T05-SG02-060503-TD-GEN-0187/en>
- c) May 2006 letter to ICANN: <http://www.itu.int/md/T05-SG02-070130-TD-GEN-0231/en>
- d) March 2007 letter to ICANN: <http://www.itu.int/md/T05-SG02-071030-TD-WP1-0148/en>

Following an enquiry from ITU on 13 January 2010, we were informed by the United States Department of State, on 6 April 2010, that *“this matter relates to the [IANA] functions contract that the Department of Commerce’s [NTIA] has with [ICANN].”*

Having considered this reply from the United States, ITU-T Study Group 2, at its November 2010 meeting, agreed to suggest that ITU re-initiate communication as appropriate with the relevant parties regarding implementation of provisions in Recommendation ITU-T E.910.

5. Consequently, it could be appropriate for NTIA to consider specifying in any future IANA contract that the manager of the .INT top-level domain name implement the provisions of Recommendation ITU-T E.910 on Procedures for registration within the domain “.INT”.

With the convergence of the virtual and physical worlds, Internet domain names play a crucial role in establishing an online presence and identity. Internet domain names are a vehicle for making known the policies, strategies and even the purpose of an entity (country, organization, business and individual) on

the Internet. The very high price paid for a single domain name and the multibillion dollar domain name industry are both testimony to the value put on this online presence and identity.

Therefore, it is critical for international organizations, especially organizations established by international treaties, to have an appropriate presence and identity on the Internet, in line with their special status and requirements. Since these treaty organizations have already agreed that the provisions contained in Recommendation ITU-T E.910 correspond to their special requirements, it might be appropriate to consider whether any future IANA contract should specify that the manager of the .INT top-level domain name implement the provisions of Recommendation ITU-T E.910.