

By electronic mail to: IANAFunctions@ntia.doc.gov

March 31, 2011

Fiona M. Alexander
Associate Administrator
Office of International Affairs
National Telecommunications and Information
Administration
U.S. Department of Commerce
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Re: Nokia Siemens Networks Response to NTIA Request
for Comments on the Internet Assigned Numbers
Authority (IANA) Functions/Notice of Inquiry
[Docket No. 110207099-1099-01] RIN 0660-XA23

Dear Ms Alexander,

Nokia Siemens Networks appreciates the open and inclusive approach of NTIA by issuing the Notice of Inquiry (NOI) regarding the IANA Functions contract and we are happy to respond with the brief comments that follow below.

Nokia Siemens Networks is a leading supplier of telecommunications infrastructure for network operators and other communications service providers globally. Of the 100 largest operators in the world, 75 are our customers in 150 countries. Nokia Siemens Networks also is an active member of the Internet community with several years of significant contributions in organizations such as IETF, IAB and ICANN.

As a company, Nokia Siemens Networks is a strong supporter of the multi-stakeholder model with inclusive bottom-up policy processes and high transparency. We believe that development, standardization and governance of the Internet should stay with the current organizations responsible for these areas. We believe that the IANA functions should continue to be directed and guided by the IAB and IETF.

Please find below our responses to some of the detailed questions in the NOI:

Q1 Should the IANA functions continue to be treated as interdependent?

Nokia Siemens Networks' view is that the IANA functions should be performed by a single entity. Although it is possible to contract the function to different entities, there are connections and synergies on a detailed level and the functions have similar dependencies on other organizations like IETF and IAB. Splitting the functions will most likely lead to increased complexity and overhead costs.

Q2. 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?

Nokia Siemens Networks believes that the new contract should contain high level definitions of the functions but not include deep technical details. We would like to reconfirm that the IANA function should be operated under the auspices of the IAB and other organizations as delegated by the IETF or IAB.

Q3. 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?

This is one of the core IANA functions and also here transparency is a key element to increase and maintain trust between all involved parties. Nokia Siemens Networks recommends that all relevant information regarding process phases, criteria and outcome be made available.

Q4. Broad performance metrics and reporting are currently required under the contract. Are the current metrics and reporting requirements sufficient?

Nokia Siemens Networks does not see urgent needs to change these requirements but would prefer the results to be publicly available.

Q5. 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?

Nokia Siemens Networks does not see the IANA Contract as the best place to define process improvements nor performance enhancements. Rather the contract should contain general requirements for these issues. How to improve processes and performance in detail should be up to the function operator in cooperation with the community.

With best regards,

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