

Fiona M. Alexander
Associate Administrator
Office of International Affairs
National Telecommunications and Information Administration
1401 Constitution Avenue, NW, Room 4701
Washington, DC 20230

Re: *Notice of Inquiry*, Request for Comments on the Internet Assigned Numbers Authority (IANA) Functions, Docket No. 110207099–1099–01, RIN 0660–XA23

By electronic mail: IANAFunctions@ntia.doc.gov

Dear Ms. Alexander:

Nokia is pleased to submit the following comments to the National Telecommunications and Information Administration *Notice of Inquiry*, Request for Comments on the Internet Assigned Numbers Authority Functions.

General comments:

Nokia is the world's leading mobile phone supplier and a leading supplier of mobile and fixed telecom networks including related customer services.

Nokia strongly supports the multi-stakeholder, highly-transparent, bottoms-up policy process for Internet Governance. Overall Nokia believes that there is no reason to drastically change the current responsibilities in the areas of Internet Governance, standardization and development.

Responses to NOI questions:

Q1: 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.

- Nokia believes that all IANA functions should be performed by a single entity. Many of the IANA dedicated tasks require close cooperation with different organizations such as Internet Engineering Task Force (IETF) and Nokia believes that one entity could handle the interactions the most efficient and cost-effective way.

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? Please provide specific information as to why or why not. If yes, please provide language you believe accurately captures these relationships.

- Nokia believes that high-level references would be more useful than detailed technical descriptions. IANA definitely needs to function within the boundaries set by Internet technical community (IETF, IAB, RIRs, and ccTLD Operators) but overly-detailed descriptions might prove to be too prohibitive and restrictive in the longer run.

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? Please provide specific information as to why or why not. If yes, please provide specific suggestions.

- Nokia believes that this is an area that needs to include transparency by design to maintain a high level of trust between the different parties who are involved. It is of utmost importance to have the relevant data about the current policy development process available in a timely and transparent manner.

Q4. 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?

- Nokia sees no reason why the current metrics wouldn't provide sufficient data for analyzing the performance. To improve transparency and accountability this data could be made 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? Please provide specific information as to why or why not. If yes, please provide specific suggestions.

- Nokia believes that IANA operations should be continuously improved in terms of security, stability and transparency. However, such processes are best performed in cooperation with the Internet technical community, and the contract should only reflect the general need for those kinds of activities.

For further information, please contact:

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