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

RE: United States Department of Commerce, Request for Comments on the Internet Assigned Numbers Authority (IANA) Functions.
[Docket No. 110207099-1099-01]

Dear Ms. Alexander,

PayPal welcomes the opportunity to comment on [the Internet Assigned Numbers Authority \(IANA\) Functions](#) and appreciates the role played by NTIA in ensuring that these functions, essential to the Internet, are responsibly and professionally managed.

The Internet has evolved from an experiment to become a vital component of daily life for many on the planet. Much of this evolution has occurred in the last ten to fifteen years, with a substantial portion during the initial contract period between NTIA and IANA. Throughout that period, Internet names and numbers have provided a steady platform on which to build Internet services and the Internet community both expects and requires that this will continue.

PayPal supports a renewal of the IANA functions on substantially similar terms. This will serve to ensure the stability of core Internet services and encourage their continued expansion. At the same time, we believe there are opportunities to make improvements to the contract and its implementation that would be generally beneficial for Internet Governance.

We believe that the Internet's success is largely due to its distributed and generative nature, allowing it to grow and change in ways not originally foreseen. This evolution was a direct result of the technical community encouraging participation in a set of open and transparent processes with each participant accorded equal standing. This mechanism was itself an experiment, but was and still remains highly successful.

The principles of openness, transparency, and equality form the foundation on which the Internet community rests. IANA performs a set of functions essential to the Internet and we believe that the Internet community would benefit from applying these basic principles to the IANA functions contract as well. While this

review allows the community to provide input, that input alone is not sufficient to satisfy the basic principles.

We suggest that any changes to the IANA functions contract must be consistent with the principles of openness, transparency, and equality. Generally speaking, the contract language should be less specific, require open reporting and independent reviews, and encourage stability through long-term rather than short-term commitments. Making these changes would enable IANA to be more agile and respond to changes that might be necessary as the Internet itself changes.

As an adjunct, we believe that a covenant, similar to the ICANN Affirmation of Commitments, would significantly enhance international community support provided it contains assurances that all parties commit to the principles of openness, transparency, and equality. Community members have concerns related to censorship, root zone maintenance, and a general perception that the community is excluded from any discussion of these important issues. Failure to recognize and address these concerns and perceptions could have a corrosive effect.

We believe that NTIA should take the opportunity presented by the IANA functions contract renewal to address these general, but important issues. PayPal would welcome the opportunity to discuss these issues and possible solutions in an appropriate forum and encourages NTIA to obtain further input. We respond to NTIA's six specific requests for information as follows:

1. We believe that the majority of current IANA functions should remain at a single entity. With respect to the specific question of port number and protocols, we recommend a move of this function from IANA to IETF. The IETF has the demonstrated capability and respected international reputation to perform this function on behalf of the Internet community. We do not recommend that this function be moved to any other de facto or de jure standards organization, as we believe that no other body has the stature, practical experience or pragmatism of the IETF.
2. Clearly establishing IANA's role as implementing policy and procedure rather than establishing policy is laudable. However, specifically mentioning those organizations that do establish policy or procedure may be seen, by some, as an attempt for NTIA to expand its reach to include those organizations, by reference, within NTIA's scope. This would be unfortunate and is, we believe, avoidable.
3. As noted in the Notice of Information, there is considerable interest in Root zone requests by governments, operators, and the public. While there are varied causes for this interest, we believe that many of the concerns behind the interest can be addressed, at least partially, through a substantially more open and transparent process for handling such requests. While the set of

organizations which currently support the Root zone perform in an entirely competent manner, it's true to say that their composition is completely a matter of history, and it's not at all obvious that the same set of choices would be made if the Root zone and its operational support were designed today. We believe that the realities of this substantially increased interest in this topic demand a much more open process by which the Root zone is managed.

4. Monthly Performance Reports and any other information provided to NTIA should be made available to the public. IANA performs functions essential to the operation of the Internet and as the Internet becomes ever more important globally, it is imperative that the IANA functions are performed in an accountable and transparent manner.
5. Substantially all of the information related to the operation of the IANA functions should be available to the public in a timely manner. As with other aspects of Internet Governance, accountability and transparency regarding the IANA functions will enhance confidence in the underlying structures and institutions supporting the Internet.
6. The security mechanisms in the current contract are reasonable, from a high-level perspective. However, any detailed analysis would be highly dependent on the contractor-developed security plan. Without access to that plan, and any updates, it is difficult to determine if the specific mechanisms in the plan are adequate.

Recognizing that most security plans are closely held, making the plan available to the public is unwarranted. However, it would be appropriate to call for an independent review of the contractor's security plan in order to enhance confidence in the plan. We suggest including such a requirement in future contracts.

As stated earlier, PayPal supports a renewal on generally similar terms, with the exception of markedly increased transparency in all IANA operations. IANA performs functions essential to the Internet and it is equally essential that all that depend on the Internet be able to review IANA's operations.

Sincerely,

Michael Barrett,

Chief Information Security Officer,

PayPal