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Subject: ictQATAR Response to NTIA Request for Comments on the Internet Assigned Numbers Authority "IANA" Functions

The Supreme Council of Information and Communication Technology " ictQATAR" welcomes the opportunity to provide comments in response to the National Telecommunications and Information Administration's (NTIA's) Notice of Inquiry "NOI" on the IANA functions.

The Internet has become the global network which used by more than two billion users worldwide, ictQATAR welcomes and shares the NTIA's stated commitment to preserving the stability and security of the Domain Names System "DNS" and ensure a robust and operable internet for all. The IANA functions currently managed by the Internet Corporation for Assigned Names and Numbers "ICANN" specially the responsibilities associated with DNS root zone management are critical to the internet stability and security.

ictQATAR welcomed the Affirmation of Commitments between the United States Department of Commerce and ICANN in September 2009, which ended the exclusive oversight on ICANN and was a step forward toward internationalizing ICANN's Accountability and Transparency.

The Stability and Security of the Internet relates to the performance of IANA functions, this stability and continuity of functions requires longer IANA contract period than the current one year base term. The IANA functions are being performed for the benefits of the global internet users and requires global trust, transparency and accountability.

ictQATAR specific Responses to NTIA's NOI questions related to IANA function :

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 IANA function is critical to the internet stability and security; any proposals related to the separation or splitting of the current IANA functions need to be studied with caution. A single unit coordination is still valid and required due to the criticality of the functions performed by IANA and to ensure stability of the Internet .

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 eco-system and technical community depends on a multi-stakeholder model for its technical functions coordination, which requires IANA to coordinate and consult with other stakeholders in conducting its core functions. The coordination level between IANA and other technical stakeholders might vary depending on the relationship between IANA and the other entities such as IETF, RIR and ccTLD operators. Adding reference to those entities to the IANA functions contract should not limit IANA from interacting with other internet technical community stakeholder or the internet community at-large; and create new relations as the internet multi-stakeholder model evolves.

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.*

Automation of IANA's Root DNS management services, transparency related to Root DNS changes and proper auditing on IANA functions performance are required changes and will be welcomed by the internet technical community.

The Time frames required to complete Root DNS changes and other IANA functions should be clear and documented, Root DNS changes requests status should be visible to the requestor in a real-time mode.

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?*

Due to the scarcity of information currently available related to IANA reporting mechanism or amount of information required, it's difficult to comment on what are the new required specific information to be included. Due to IANA function criticality, it's important to ensure greater transparency in providing information to the internet community about the overall performance of IANA in compliance with its core functions.

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.*

Same as our response to Question 3.

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.*

IANA functions related to Root DNS management should be secure and stable, its could be recommended to audit those functions and ensuring their compliance with the highest security standards from International recognized standards bodies .

About ictQATAR :

In 2004, the Government of Qatar established The Supreme Council of Information and Communication Technology “ ictQATAR” in order to regulate and encourage the use of technologies to advance the nation’s objectives. Qatar’s Decree Law No. 36 created ictQATAR with the mission to create an advanced knowledge society through ICT infrastructure and skills development, the delivery of e-services and the establishment of a regulatory environment that promotes growth and benefits citizens, businesses and the government.

ictQATAR is leading the strategic thinking and implementation of ICT initiatives in government, market development and knowledge management, education, health, business, and cyber security. ictQATAR is also the Qatar’s Country Code Top Level Domain Operator (.QA ccTLD and قطر .IDN ccTLD).

Best Regards,

A handwritten signature in black ink, appearing to be "S. Fakhro", is written over a printed name and title.

Salwa Fakhro
Institutional Relations Manager