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National Telecommunications and Information Administration
U.S. Department of Commerce
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RE: Further Notice of Inquiry on the Internet Assigned Numbers Authority Functions

About CONAC

China Organizational Name Administration Center (CONAC) is a not-for-profit organization established in March 2008. With the authorization of the State Commission Office for Public Sector Reform (SCPSR) and the Ministry of Industry and Information Technology (MIIT), CONAC runs the registry for “.政务.cn” and “.公益.cn” .

Introduction

CONAC welcomes the National Telecommunications and Information Administration (NTIA) request for further public comment on potential enhancements to the performance of the Internet Assigned Numbers Authority (IANA) functions. The effective performance of IANA functions is of great importance to the efficient assignment of global Internet resources. Therefore, it is necessary to have an organization which is transparently operated and widely accepted by the global Internet community to perform IANA functions in a persistent manner.

Answers

Q1. Does the language in “Provision C.1.3” capture views on how the relevant stakeholders as sources of the policies and procedures should be referenced in the next IANA functions contract. If not, please propose specific language to capture commenters’ views.

Answer to Question 1:

Section C.1.3 mainly states that the United States will apply confidentiality obligation on information protection, while there is no description of how to introduce relevant stakeholders’ opinion when developing policies and procedures. According to C.1.3, the information is confidential to all countries but the United States. Additionally, the protection policy follows US laws and

regulations, there must be uncertainties in other countries and regions. Therefore, the protection of confidential information is regarded as comparative and need to be further studied. It is recommended to accredit a real independent body to deal with information confidentiality and a multi-stakeholder model shall be introduced.

7. Does the new "Provision C.2.2.1.3.5 Customer Service Complaint Resolution Process" provide an adequate means of addressing customer complaints? Does the new language provide adequate guidance to the IANA functions contractor on how to develop a customer complaint resolution? If not, please provide detailed comments and suggestions for improving the language.

Answer to Question 7:

CONAC welcomes the adding of Customer Service Complaint Resolution Process (CSCR). We expect CSCR may better resolve customer complaints. We also believe the new provision will bring positive effect to IANA functions contractor on how to develop a customer complaint resolution.

Comments

1. Comment on Section C.2.2

Section C.2.2 describes that the "Contractor may establish and collect fees from third parties (i.e., other than the Government) for the functions performed under this purchase order". We consider such exception is unfair. If the Government is served by the contractor, it should pay related fees.

2. Comment on Section C.2.2.1.1

Section C.2.2.1.1 requires that "the Contractor shall ensure that any and all staff dedicated to executing the IANA functions from any policy development". It is required to specify the policy maker of IANA functions. In addition, the management of critical IANA functions is suggested to take a bottom-up and multi-stakeholder model. It could be the only way to ensure the impartiality and transparency when performing IANA functions.

3. Comment on Section C.2.2.1.2

The performance standard and metrics described in Section C2.2.1.2, in nature, are all up to U.S. government's decision. As a technical issue, the performance standard and metrics developed by the Contractor and relevant stakeholders can be operated as criteria.

4. Comment on Section C.2.2.1.3.1

The Transparency and Accountability described in Section C.2.2.1.3.1 are just set in practice stage. A complete transparency and accountability should start from the initial policy development stage, which means more stakeholders should get involved in the policy-making process regarding IANA functions. It is unacceptable for any single country to dominate global Internet resources.

5. Comment on Section C.2.2.1.3.2

In light of Section C.2.2.1.3.2, the Contractor shall abide by local laws of registries. However, Section C.2.1 states that the Contractor must possess and maintain through the performance of this acquisition a physical address within the United States, which means the Contractor must follow U.S. laws. But how to deal with legal conflicts between U.S. laws and registries' local laws remains a tough issue.

6. Comment on Section C3.4

According to C3.4, the Contractor shall deliver annual security plans to the U.S. government, which indicates the U.S. government has the sovereign power to control the Internet resources. We therefore suggest making the computer security plan available for comment by all multi stakeholders, for maintaining the security of cyber space is not a mission only for the U.S. government, and it cannot be accomplished by any single nation.

7. Comment on Section C.4.1

The monthly performance progress report described in Section C.4.1 shall be available for public access. In addition, a public forum could be regularly organized to get the public involved.

8. Comment on Section C.4.4

To some extent, the Performance Survey described in C.4.4 helps the public supervise the operation of IANA functions, while more details need to be added, such as how to ensure the global participation, and how should the Contractor use the survey result to make changes.

Thanks for your consideration.

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