



29 Jul 2011

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

Re: Docket #110207099-1399-02  
Internet Assigned Numbers Authority (IANA) Functions  
Further Notice of Inquiry

Ms. Alexander:

Please accept the following comments in response to the Further Notice of Inquiry regarding IANA functions.<sup>1</sup> Go Daddy reserves the right to future comments on this issue and our positions include, but are not necessarily limited to, the text herein.

### **Overview**

As stated in our previous comment<sup>2</sup>, we are generally satisfied with the current procurement of IANA functions and the incumbent operator. Additionally, because the IANA Functions contract is a critical component of Internet governance, we caution against making sweeping and material changes without careful consideration of their impact on the long-term continuity of IANA functions.

That said, we concur with the conclusions reached by NTIA from the initial NOI and we especially welcome the additional transparency requirements for handling changes to the DNS Root Zone provided in C.2.2.1.3.1

Furthermore, we acknowledge that the proposed Statement of Work (SOW) would be appropriate provided the various elements are properly defined, implemented, and reviewed, for example:

We generally support the requirements for Performance Metrics (C.4) and Audits (C.5), but note that the proposed SOW does not provide examples of penalties or sanctions for Contractor underperformance.

We are not clear on the specific Contractor obligations in C.6.3 with regard to ccTLD delegations.

### **Conclusion**

The draft SOW presents a welcomed enhancement in the performance of the IANA

Functions Contract, and the relationship between the Contractor, the NTIA and interested stakeholders. There are, however, some areas that require further development of details. We reiterate our recommendation that changes to IANA not be undertaken in a manner that is disruptive or rushed.

Sincerely,  
GoDaddy.com, Inc.

Tim Ruiz  
Vice President  
Corporate Development and Policy  
GoDaddy.com, Inc.

1. <http://ntia.doc.gov/federal-register-notice/2011/internet-assigned-numbers-authority-iana-functions-further-notice-inqui>
2. <http://ntia.doc.gov/files/ntia/comments/110207099-1099-01/attachments/Go%20Daddy%20response%20IANA%20NOI.doc>