

July 29, 2011

To: Fiona M. Alexander  
Associate Administrator  
Office of International Affairs  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
Washington, DC 20230

Response to docket number: 110207099131902

Kuwait Information Technology Society (KITS) welcomes the opportunity made by the NTIA to provide public comments on the IANA functions further notice of inquiry (FNOI). KITS expresses its deepest appreciation to this effort made by the NTIA which support a more transparent process on issues relevant to the Internet and its users across the Globe.

Find below our response to the questions:

1. 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.

The Provision C.1.3 is clear.

2. Does the new “Provision C.2.2.1.1” adequately address concerns that the IANA functions contractor should refrain from developing policies related to the IANA functions? If not, please provide detailed comments and specific suggestions for improving the language.

The Provision C.2.2.1.1 is clear and we find it important and proper. However, the IANA functions contractor should be allowed to express his opinion from a technical point of view on policies without taking part on the decision making process for these policies.

3. Does the language in “Provisions C.2.2.1.2, C.2.2.1.3, C.2.2.1.4, and C.2.2.1.5” adequately address concerns that the IANA functions contractor should perform these services in a manner that best serves the relevant stakeholders? If not, please propose detailed alternative language.

The language is clear. We would like to suggest that with reference to the collaboration with relevant stakeholders in Provisions C.2.2.1.2 and C.2.2.1.3, that minimum number of stakeholders that the IANA functions contractor should collaborate with are all the stakeholders mentioned in Provision C.1.4 namely the Internet Engineering Task Force (IETF) and the Internet Architecture Board (IAB), regional registries, country code top-level domain (ccTLD) operators/managers, governments, and the Internet user community.

4. Does the language in “Provision C.2.2.1.3” adequately address concerns related to root zone management? If not, please suggest detailed alternative language. Are the timeframes for implementation reasonable?

The Provision C.2.2.1.3 adequately addresses the concerns related to root zone management.

5. Does the new “Provision C.2.2.1.3.2 Responsibility and Respect for Stakeholders” adequately address concerns related to the root zone management process in particular how the IANA functions contractor should document its decision making with respect to relevant national laws of the jurisdiction which the TLD registry serves, how the TLD reflects community consensus among relevant stakeholders and/or is supported by the global public interest. If not, please provide detailed suggestions for capturing concerns. Are the timeframes for implementation reasonable?

Documenting decision making process according to national laws will be mainly applicable to ccTLDs. The operator may not have the capability to interpret correctly national laws related to all ccTLDs. Therefore we would suggest that for this process, the operator collaborates with relevant ccTLDs operators.

6. Does the new “Section C.3 Security Requirements” adequately address concerns that the IANA functions contractor has a secure communications system for communicating with service recipients? If not, how can the language be improved? Is the timeframe for implementation reasonable?

Yes, section C.3 adequately address that the IANA functions contractor must have a secure communications system.

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.

With reference to our input for Question 3, this process should be developed in collaboration with all relevant stakeholders and the IANA functions contractor should be obliged to forward the input of relevant stakeholders to the NTIA.

8. Does the new “Provision C.3.6 Contingency and Continuity of Operations Plan (CCOP)” adequately address concerns regarding contingency planning and emergency recovery? If not, please provide detailed comments and suggestions for improving the language. Are the timeframes for implementation reasonable?

Yes, the new “Provision C.3.6 CCOP” adequately addresses concerns regarding contingency planning and emergency recovery. The timeframes are suitable too.

9. Does the new “Section C.4 Performance Standards Metric Requirements” adequately address concerns regarding transparency in root zone management process, and performance standards and metrics? Should the contractor be required to gather and report on statistics regarding global IPv6 and DNSSEC deployment? If so, how should this requirement be reflected in the SOW? What statistics should be gathered and made public?

We would like to suggest that the IANA functions contractor should publish the monthly report in provision C.4.1 and the final report in provision C.4.5 as a way to increase the transparency.

We support that the contractor be required to gather and report on statistics regarding global IPv6 and DNSSEC deployment.

10. Does the new “Section C.5 Audit Requirements” adequately address concerns regarding audits? If not, please propose alternative language. Are the timeframes for implementation reasonable?

Section C.5 adequately addresses the audits concern and the timeframes are reasonable.

Sincerely Yours,,

Qusai Al-Shatti  
Deputy Chairman, Kuwait Information Technology Society