

Monterrey, Nuevo León, México, 29th July, 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

Latin American and Caribbean ccTLDs Organization welcomes the opportunity to provide comments in response to the National Telecommunications and Information Administration (NTIA) request, for public comments on the IANA functions further notice of inquiry (FNOI).

Below are the responses to the questions from LACTLD:

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.

LACTLD considers that the provision is clear.

LACTLD recognizes the positive value in the IANA staff contribution in the policy development processes (PDP), and expects to have those contributions in the future, by request of the different working groups and committees involved in the PDP that are willing to have this collaboration, but keeping IANA Staff out of the decision making process.

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.

The drafting specifies functions, limits the operator actions and establishes a deadline for the execution of assigned activities.

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 time frame for implementation is reasonable.

The drafting recognizes that standards would be defined taking into account the proper actor’s opinions.

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?

It is important to outline that TLD’s are circumscribed to national, local or jurisdictional legislations, issue that enables to foresee the existence of substantial differences among one another, so in that case the definition of a unique process would be non-viable. It’s indispensable a joint work among all actors, especially to consider the ccTLD Manager’s opinions.

The time frames for implementation are acceptable.

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, new “Section C.3” adequately addresses concerns that the IANA functions contractor has a secure communications system for communicating with service recipients.

The time frame for implementation is reasonable.

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.

The new drafting does not provide specific information on how and by which way a complaint will be solved. It only indicates that contractor must establish a process to file complaints.

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.

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?

Yes, “Section C.4 Performance Standards Metric Requirements” adequately addresses concerns regarding transparency in root zone management process, and performance standards and metrics.

Yes, the contractor should 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?

The provision C1.5 is clear and the timeframes for implementation are reasonable.

Yours Sincerely,

Oscar A. Robles Garay
Chairman of the Board of Directors
LACTLD