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The Number Resource Organization (NRO) response to the National Telecommunications and Information Administration Docket No. 110207099–1319–02: Further Notice of Inquiry on The Internet Assigned Numbers Authority (IANA) Functions

The Number Resource Organization (NRO) appreciates the National Telecommunications and Information Administration's (NTIA) continued review of the IANA functions contract and Statement of Work (SOW). By providing a summary of comments to the initial NOI and their response to those comments, NTIA has demonstrated their commitment to seeking input from the community and support for community driven policymaking.

As stated in our previous NOI response, the NRO maintains that the renewal of the IANA functions contract provides an opportunity to consolidate the established multi--- stakeholder approach to Internet technical coordination and to demonstrate NTIA's commitment to Internet community stakeholders and global governance.

In order to better understand the intent of the SOW, the NRO seeks clarification on several points. The clarifications we seek are on those points we believe could have an adverse affect on the Regional Internet Registries and their relationship with the IANA functions Contractor. We look forward to NTIA's response to our suggestions and are available for further clarification if needed. The points we seek clarification on follow.

"C.1.4 The contractor, in performance of it duties, has a need to have close constructive working relationships with all interested and affected parties including to ensure quality performance of the IANA functions. The interested and affected parties include, but are not limited to, 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."

We agree that there is a need for close constructive relationships with all parties including the Regional Internet Registries (RIRs). Given RIRs have a unique relationship with the IANA Contractor, as stated in RFC2050, and can be materially affected through the performance of the IANA functions contract we believe they should be acknowledged and included in the above statement. For clarity, we note the term Regional Registry also appears in C.2.2.1.4 and we suggest changing both sections. We suggest the following wording:

C.1.4 … The interested and affected parties include, but are not limited to, the Internet Engineering Task Force (IETF) and the Internet Architecture Board (IAB), <u>Regional Internet Registries (RIRs)</u>, country code top---level,

domain (ccTLD) operators/ managers, governments and the Internet user community.

"C.2.2.1.4 Allocate Internet Numbering Resources – This function involves overall responsibility for allocated and unallocated IPv4 and IPv6 address space and Autonomous System Number (ASN) space. It includes the responsibility to delegate IP address blocks to regional registries for routine allocation, typically through downstream providers, to Internet end---users within the regions served by those registries. This function also includes reservation and direct allocation of space for special purposes, such as multicast addressing, addresses for private networks as described in RFC 1918, and globally specified applications. Within six (6) months of award, the Contractor shall submit to NTIA performance standards and metrics developed in collaboration with relevant stakeholders for approval. Upon approval by the COTR, the contractor shall perform this task in compliance with approved performance standards and metrics. The performance of this function shall be in compliance with the performance exclusions as enumerated in Section C.6."

As stated earlier the RIRs have a very unique relationship with the IANA Contractor. The NRO has worked closely with the Contractor on performance and standards. As an organization materially affected by the Contractor's performance, it is important that the relationship be maintained to ensure the needs of the Internet community are met. Given this relationship we believe the language proposed below would better meet the intent of the metrics. Additionally, the role of the COTR should be clarified. The COTR's approval is needed to ensure the tenets of the contract are complied with, not to presume the relevancy of the metrics. We suggest the following wording:

C.2.2.1.4 … Within six (6) months of award, the Contractor shall submit to NTIA performance standards and metrics developed in collaboration with materially affected parties for approval. The COTR will approve the proposed standards and metrics unless found and identified to be in direct conflict with the contract. Following any necessary modifications and upon approval by the COTR, the Contractor shall perform this task in compliance with approved performance standards and metrics. The performance of this function shall be in compliance with the performance exclusions as enumerated in Section C.6.

"C.3.1 Secure Systems – the Contractor shall install and operate all computing communications systems in accordance with best business and security practices. The Contractor shall implement a secure system for authenticated communications between it and its customers when carrying out all IANA function requirements within nine (9) months after date of contract award. The Contractor shall document practices and configuration of all systems."

The NRO understands the importance of constantly evolving security requirements and strongly supports the use of best practices, however it cannot end there. Given that for any security requirements to be effective, there must be a two---way street between those setting the policies and those affected by the policies. The Contractor must take into consideration the various systems in use by those they interface with, i.e. RIRs, and how the policies being proposed will affect them. We suggest the following wording:

C.3.1 Secure Systems – the Contractor shall install and operate all computing communications systems in accordance with best business and security practices. The requirements for any secured communication system shall be

developed in coordination with those materially affected by the policies. The Contractor shall implement a secure system for authenticated communications between it and its customers when carrying out all IANA function requirements within nine (9) months after date of contract award. The Contractor shall document practices and configuration of all systems.

"C.6.2 This purchase order, in itself, does not authorize the Contractor to make material changes in the policies and procedures developed by the relevant entities associated with the performance of the IANA functions. The Contractor shall not change or implement the established methods associated with the performance of the IANA functions without prior approval of the COTR."

If such language were taken literally, it would effectively provide NTIA with control over the global policy process for Internet number resources. The NRO finds such language contrary to both the NTIA's published "U.S. Principles on the Internet's Domain Name and Addressing System", as well as globally accepted multistakeholder principles on Internet governance, and therefore unacceptable. We suggest the following wording to provide more appropriate guidance to the Contractor:

C.6.2 This purchase order, in itself, does not authorize the Contractor to make material changes in the policies and procedures developed by the relevant entities associated with the performance of the IANA functions. The Contractor shall not change or implement the established methods associated with the performance of the IANA functions without direction via recognized consensus under documented multi---stakeholder processes.

In response to the question as whether the Contractor should be required to gather and report on statistics about global IPv6 and DNSSEC deployment, the NRO has no comment regarding DNSSEC. However, given the Contractor's role in allocating IPv6 addresses and the complexities associated with determining if allocated and assigned IP addresses have been deployed, the NRO does not believe this is a necessary requirement.

Lastly, the NRO believes that maintaining open and transparent processes are key to overcoming the challenges facing the Internet and ensuring it will continue to evolve in a secure and stable manner. We recognize and are encouraged by NTIA's efforts to openly consult with stakeholders, and furthermore appreciate the opportunity to comment on the proposed SOW. However, we cannot emphasize enough the need to make the Contractor accountable to the community materially affected by their performance as well as to NTIA, and ask that NTIA keep this mind as they finalize the SOW.

Best regards,

Raul Echeberría
Chair NRO