China Organizational Name Administration Center
Jia 31, Guangximen Beili, Xibahe, Chaoyang District
Beijing, 100028
P. R. China
Mar. 31, 2011

Fiona M. Alexander
Associate Administrator
Office of International Affairs
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Room 4701
Washington, DC 20230
IANAFunctions@ntia.doc.gov

RE: Request for Comments on the Internet Assigned Numbers Authority Functions

China Organizational Name Administration Center (CONAC) appreciates the opportunity provided by National Telecommunication and Information Administration (NTIA) to comment on IANA functions contract. We suggest the establishment of a framework that allows for multi-stakeholder supervision on IANA function performance, which would not only ensure the security and stability of the Internet, but also protect the interests of the multi-stakeholder groups. CONAC's responses to Notice of Inquiry are as follow.

Q1. The IANA functions have been viewed historically as a set of interdependent technical functions and accordingly

performed together by a single entity. In light of technology changes and market developments, should the IANA functions continue to be treated as interdependent? For example, does the coordination of the assignment of technical protocol parameters need to be done by the same entity that administers certain responsibilities associated with root zone management? Please provide specific information to support why or why not, taking into account security and stability issues.

Response:

As IANA functions are highly interdependent, we suggest no separation of IANA functions, in consideration of security and stability of the Internet and the economies of scale. Years of operational practice have also proven it is of high efficiency that a single entity performs all IANA functions.

Q2. The performance of the IANA functions often relies upon the policies and procedures developed by a variety of entities within the Internet technical community such as the IETF, the RIRs and ccTLD operators. Should the IANA functions contract include references to these entities, the policies they develop and instructions that the contractor follow the policies? Please provide specific information as to why or why not. If yes, please provide language you believe accurately captures these relationships.

Response:

We agree that IANA functions contract includes the references to entities, policies and instructions mentioned above. But in light of the extensiveness of the community, we suggest that references be collected in the form of attachment and be updated regularly.

Q5. Can process improvements or performance enhancements be made to the IANA functions contract to better reflect the needs of users of the IANA functions to improve the overall customer experience? Should mechanisms be employed to provide formalized user input and/or feedback, outreach and coordination with the users of the IANA functions? Is additional information related to the performance and administration of the IANA functions needed in the interest of more transparency? Please provide specific information as to why or why not. If yes, please provide specific suggestions.

Response:

We notice that ICANN, as the operator of IANA functions, is actively engaged in customer experience improvement, which to large extent, is attributed to the multi-stakeholder model. Likewise, we believe it is imperative for IANA to incorporate muti-stakeholder model and establish a formalized mechanism to collect IANA functions users' inputs and feedbacks to improve the overall customer experience. Also, more information concerning IANA functions performance and management should be released to enhance transparency and facilitate the multi-stakeholder's supervision on the performance of IANA functions.

Q6. Should additional security considerations and/or enhancements be factored into requirements for the performance of the IANA functions? Please provide specific information as to why or why not. If additional security considerations should be included, please provide specific suggestions.

Response:

As the security issues involve many factors, and differ greatly among regions, we suggest not incorporating security

considerations and enhancements in IANA functions.

We have reasons to believe that under the leadership of ICANN Chairman Peter Dengate Thrush and President and CEO Rod Beckstrom, a new pattern of the IANA functions contract can better serve the development of the Internet.

About CONAC

China Organizational Name Administration Center (CONAC) is a non-profit organization established in 2008. With the authorization of the Chinese government, CONAC runs the registry for ".政务.cn" (Government Affairs) and ".公益.cn" (Public Interest). CONAC also actively participates in the global Internet community.