



Canadian Internet  
Registration Authority

Autorité canadienne pour  
les enregistrements Internet

June 2, 2009

Ms. Fiona M. Alexander  
Associate Administrator  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Ave. NW., Room 4701  
Washington, DC, 20230

**Re: Assessment of the Transition of the Technical Coordination and Management of the Internet's Domain Name and Addressing System**

Dear Ms. Alexander;

The Canadian Internet Registration Authority welcomes this opportunity to comment on the pending expiration, scheduled to occur on September 30, 2009, of the Joint Project Agreement between the United States Department of Commerce and the Internet Corporation for Assigned Names and Numbers.

Our submission can be summarised as follows: While CIRA continues to endorse the objective that the technical management and coordination of the Internet's assigned names and numbers transition to the private sector, we feel there are several critical areas where urgently required progress could be unnecessarily put at risk should the transition take place prematurely. Consequently, CIRA recommends that a transition to fully independent, private-sector status be delayed for a short period so that the Internet Corporation for Assigned Names and Numbers may make further progress in these areas.

Without specifically replying to the eight sets of questions posed in the NTIA's April 20, 2009, Notice of Inquiry but focusing, rather, on our key concerns, please allow us to expand on our above summary.

The fundamentals of risk and risk mitigation inform our submission. A standard risk-analysis model shows that the likelihood of the overall success of any endeavour becomes exponentially more compromised as the number of issues that must be resolved to achieve that success increases. At this time, there are several areas in which urgent progress must be made, and each of them intensifies the risk to a successful transition to fully independent, private-sector status.

CIRA supports a model for the technical management and coordination of the Internet's assigned names and numbers that embraces the four principles of stability; competition; private, bottom-up coordination; and representation. Improvements have been made in the transparency and accountability of the ICANN model over the past two years, and further insights and clarity around financial issues are soon expected. While more does need to be done, the multi-stakeholder approach has worked reasonably well. More than 1.2-billion people regularly participate in Internet-based activities, and the Internet has come to thrive at the intersection of communications and commerce.

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Similarly, as stated, we continue to endorse the objective that the technical management and coordination of the Internet's assigned names and numbers transition to the private sector, but that it does so in a manner that sustains these four principles and facilitates international participation in the coordination of the DNS.

Among these four principles, the stability and security of the DNS must take precedence, and at present, there are several areas directly pertaining to the stability and security of the DNS where it is urgent and essential that specific progress be made. A too-early transitioning to private-sector management unnecessarily increases the risk that this required progress fails to take place if only because the transition process will divert attention and consume resources.

Key among these areas is the successful implementation of the DNS Security Extensions, or DNSSEC, in the root. While we applaud the recent announcement that an interim measure for signing the root will be in place by the end of 2009, we also recognise that several parties have valid objections that need to be addressed and that there are outstanding legal and technical issues to be resolved. Still, we are encouraged by the progress that is being made and we urge continued high-priority attention be paid to this issue.

Secondary areas that require further progress are the implementation of Internationalized Domain Names, the adoption of IPv6 and the introduction of new global TLDs.

On the first of these, there is a fast-track process that proposes a schedule that would see IDN implemented by ccTLDs by early 2010. CIRA supports this timetable.

Given the expected continued explosive growth of the Internet, especially in rapidly developing regions of the world, exhaustion of IPv4 addresses is imminent. Even in regions where allocation of addresses has historically been more generous, important initiatives, such as the introduction of continental smart energy grids in Europe and North America, will greatly accelerate the pressure on what is rapidly becoming a scarce resource. CIRA wishes to see ICANN take a more aggressive posture in promoting the adoption of IPv6.

While CIRA looks forward to the introduction of new gTLDs we share a concern that the unfettered increase in TLDs will amplify current shortcomings in compliance enforcement and worsen the concerns expressed by the intellectual property community. We have no timetable to propose with regard to this.

In our view, however, the greatest risk is posed by the pending lack of leadership continuity at ICANN. The current leadership is expected to depart the corporation coincident with the scheduled September 30, 2009, expiration of the JPA. Navigating a course to privatisation will require firm control and a clear understanding of the associated risks. It would be very useful, therefore, that new leadership at ICANN be given the time to cultivate sufficient knowledge and to develop the necessary relationships so that the proper course to privatisation may be strategically plotted and successfully navigated. Having an experienced hand at the wheel through the transition period may be the most effective single action ICANN can take.

What needs to be accomplished in order to mitigate the risk we currently see? In CIRA's view, an effective administrative mechanism is necessary to govern ICANN's efforts in these areas under the continued oversight of the United States Department of Commerce, but only for a short period. In keeping with the bottom-up, multi-stakeholder nature of the ICANN model, CIRA would like to see the broader Internet community seek consensus on specific criteria for each of these areas against which ICANN's progress may be measured. Once these criteria have been successfully achieved, the management and coordination of the Internet's assigned names and numbers can transition to an independent, private-sector entity.

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Appropriately so, one issue that is not addressed at all in the NOI is the status and governance of the Internet Assigned Numbers Authority, which currently is governed by ICANN under a separate contract. As a ccTLD, CIRA has no contractual relationship with ICANN although we support the ICANN model and contribute financially to the corporation. Importantly, however, we also support the critical technical coordination function IANA provides. Regardless of the eventual timetable for the transitioning of ICANN, CIRA believes that IANA's functions must continue to be administered in a manner that does not put at risk this technical coordination.

In conclusion, then, it is CIRA's submission that the number of critical issues on which ICANN must make measurable progress are too numerous and serious, making it too risky at this juncture to contemplate beginning the process of transitioning ICANN to wholly independent and private-sector status.

Sincerely,

Byron Holland  
President and CEO