June 8, 2020

United States Department of Commerce
National Telecommunications and Information Administration
Input on Proposals and Positions for the 2020 World Telecommunication Standardization Assembly
Docket No. 200504–0126

Comments of the Internet Corporation for Assigned Names and Numbers (ICANN)

**Question I. Further the Multistakeholder Approach to Internet Policy**

a. *What role would stakeholders like the ITU–T to play with respect to standards development for these issues? Given NTIA's limited resources to cover or even track all of these issues at the ITU and all other Standards Developing Organizations (SDO), it would help us to understand which of these issues are more effectively covered in other SDOs*

The role of the ITU-T is to develop international standards (ITU-T Recommendations) "which act as defining elements in the global infrastructure of information and communication technologies".[1]

Other organizations are developing standards and/or policies in the Internet field, like the Internet Corporation for Assigned Names and Numbers (ICANN), the Internet Engineering Task Force (IETF), the World Wide Web Consortium, the Regional Internet Registries (RIRs) and others. ICANN uses a multistakeholder approach to Internet policy.

The relations between ICANN and the ITU have been developing in a positive way in the last few years; e.g. in 2019 ICANN became an ITU-D sector member. Consistent with this positive development, we hope that the ITU would not pass resolutions at the WTSA which may touch on ICANN's mission and remit. As a general rule, any proposals, if they are enacted in resolutions, should not lead to harmful consequences for the technical functioning of the single, interoperable Internet; among others, they should avoid its fragmentation, and ensure that its security, stability and resiliency is intact.

**Question V. Further the Multistakeholder Approach to Internet Policy**

d. *What areas should the ITU-T avoid and of those, where are those areas better handled?*

ITU-T should avoid considering proposals in areas that are within the mandate of other relevant

[1] See https://www.itu.int/en/ITU-T/about/Pages/default.aspx

Internet organizations, as the ITU refers in ITU Resolutions 101, 102, 133, 180 (rev Dubai 2018)[2].

**Question VI. Explore Further Coordination and Collaboration With Other Industry-Led Standards Development Organizations**

a. *Are there specific areas where the work of the ITU-T is either duplicative or has unnecessary overlaps with the work of other SDOs? If so, please describe the duplication and overlap, as well as any additional concerns.*

Over the last several years, Study Groups 17 & 20 (SG17, SG20) at the International Telecommunications Union (ITU-T) have generated significant discussion around the Digital Object Architecture (DOA) technology[3]. This technology was presented at the IETF and published as a series of experimental RFCs (RFC3650[4], RFC3651, and RFC3652) with serious warnings about its fitness in the overall Internet architecture and lack of consensus in the community about its applicability. ITU-T has published a framework for DOA in recommendation X.1255[5]. ICANN has published an analysis of DOA[6].

ITU-T Study Group 13 created FG NET-2030 (FG2030,) the ITU-T Focus Group Technologies for Network 2030 in July 2018. It was set up as *"a platform to study and advance international networking technologies, and investigate the future network architecture, requirements, use cases, and capabilities of the networks for the year 2030 and beyond[7]".* A new proposal, called "New IP" is circulated in the ITU-T SG13 as a technology to realize the vision of Network 2030.

It is ICANN Org's position that Internet standards should be developed within organizations that have the relevant mandate and expertise, including the IETF, and should not be pursued within organizations such as the ITU-T, that have neither the expertise, the mandate or relevant stakeholder participation.

[2] See https://www.itu.int/en/action/internet/Documents/Res%20180.pdf "Including, but not limited to, the Internet Corporation for Assigned Names and Numbers (ICANN), the regional Internet registries (RIRs), the Internet Engineering Task Force (IETF), the Internet Society (ISOC) and the World Wide Web Consortium (W3C), on the basis of reciprocity."
[3] See https://www.dona.net and
[4] See https://www.ietf.org/rfc/rfc3650.txt, https://www.ietf.org/rfc/rfc3651.txt, and https://www.ietf.org/rfc/rfc3652.txt
[5] ITU-T Recommendation X.1255, Framework for discovery of identity management information, ITU-T, 09/2013
[6] See https://www.icann.org/en/system/files/files/octo-002-14oct19-en.pdf
[7] See https://www.itu.int/en/ITU-T/focusgroups/net2030/Pages/default.aspx