



COUNCIL OF EUROPEAN NATIONAL TOP LEVEL DOMAIN REGISTRIES

CENTR's response to Questions raised in the NTIA Notice of Inquiry on The Continued Transition of the Technical Coordination and Management of the Internet Domain Name and Addressing System

CENTR, the Council of European National Top level domain Registries, has 50 members comprising 42 ccTLDs in Europe and beyond and 8 associate ccTLD and gTLD registries from the global community. We welcome the opportunity to give input to this process and make the following response to the questions raised.

Q1: The DNS White Paper articulated principles (i.e., stability; competition; private, bottom-up coordination; and representation) necessary for guiding the transition to private sector management of the Internet DNS. Are these principles still relevant? Should additional principles be considered in light of: the advance in Internet technology; the expanded global reach of the Internet; the experience gained over the eight years since the Department of Commerce issued the DNS White Paper; and the international dialogue, including the discussions related to Internet governance at the United Nations World Summit on the Information Society (WSIS)?

CENTR believes the original principles have gained additional relevance in light of the developments raised in the question. In particular, the expanded international reach of the Internet can best be accommodated and further supported by these principles. We believe that management of the DNS is best served in the private sector and wholly endorse the view of the UN Secretary General at the World Summit on the Information Summit: *"I believe all of you agree that day-to-day management of the Internet must be left to technical institutions, not least to shield it from the heat of day-to-day politics"*. We note the outcome of the WSIS process which, in our view, does not contradict the White Paper principles, and we are following preparations for the first Internet Governance Forum later this year.

Q2: *The DNS White Paper articulated a number of actions that should be taken in order for the U.S. Government to transition its Internet DNS technical coordination and management responsibilities to the private sector. These actions appear in the MOU as a series of core tasks and milestones. Has ICANN achieved sufficient progress in its tasks, as agreed in the MOU, for the transition to take place by September 30, 2006?*

ICANN has made considerable progress since its establishment but further improvements are needed. The IANA function is at the core of ICANN's services to ccTLDs. We have been encouraged by recent steps to automate the IANA function, and improve its operational efficiency. We look forward to further progress in terms of realisation of the objectives relevant to the ccTLD community and we appreciate ICANN's recent efforts to best address these responsibilities in consultation with our community.

Q3: *Are these core tasks and milestones still relevant to facilitate this transition and meet the goals outlined in the DNS White Paper and the U.S. Principles on the Internet's Domain Name and Addressing System? Should new or revised tasks/methods be considered in order for the transition to occur? And on what time frame and by what method should a transition occur?*

ICANN's role with respect to ccTLDs is limited and primarily consists of providing the core technical service known as the IANA function. As the reliability of the function is of utmost importance for the functioning of the Domain Name System as a whole, we believe that ensuring its proper performance must be paramount when considering a time frame for transition.

With regard to ICANN's relationship with ccTLDs, we do not interpret the MoU requirement that ICANN "continue its efforts to achieve stable agreements" as meaning that ICANN must enter formal contracts with ccTLD managers. Rather, we encourage efforts to form other relationships which acknowledge the respective roles and ensure adequate service levels in respect of the IANA function, such as the publication of a standard Service Level Commitments for the operation of the IANA.

Q4: *The DNS White Paper listed several key stakeholder groups whose meaningful participation is necessary for effective technical coordination and management of the Internet DNS. Are all of these groups involved effectively in the ICANN process? If not, how could their involvement be improved? Are there key stakeholder groups not listed in the DNS White Paper, such as those with expertise in the area of Internet security or infrastructure technologies, that*



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could provide valuable input into the technical coordination and management of the Internet DNS? If so, how could their involvement be facilitated?

Q5. The *DNS White Paper* listed principles and mechanisms for technical coordination and management of the Internet DNS to encourage meaningful participation and representation of key stakeholders. ICANN, in conjunction with many of these key stakeholders, has created various supporting organizations and committees to facilitate stakeholder participation in ICANN processes. Is participation in these organizations meeting the needs of key stakeholders and the Internet community? Are there ways to improve or expand participation in these organizations and committees?

Naturally, we are mostly interested in the effective participation of ccTLDs in the ICANN process and note with satisfaction that the ccNSO has been created to provide a forum for them. To date, the ccNSO has not attracted many European ccTLDs and consequently cannot yet be seen as a means of effective ccTLD participation. We note that steps have been taken to amend the ICANN bylaws with respect to the ccNSO and urge ICANN to explore and enact what it can further do to make the ccNSO the truly inclusive and representative organization originally envisaged.

Regardless of this, it is important that ICANN establishes an effective method of processing the input of ccTLD registries in planning and executing the IANA functions. It lies in the nature of performing the IANA function that the IANA contractor be accountable and responsive to all ccTLD Registries on a non-discriminatory basis and irrespective of a ccTLD Registry's political relationship or relationship with ICANN or their being a member of the ccNSO or not.

6: What methods and/or processes should be considered to encourage greater efficiency and responsiveness to governments and ccTLD managers in processing root management requests to address public policy and sovereignty concerns? *Please keep in mind the need to preserve the security and stability of the Internet DNS and the goal of decision-making at the local level.* Are there new technology tools available that could improve this process, such as automation of request processing?

It is of utmost importance for the stability of the DNS, and ultimately the Internet, that the Authoritative root database is managed as a technical function.

We believe that decisions relating to ccTLD management policies be determined at the local level, in consultation with the Local Internet Community (including governments), and in accordance with local law.

In light of this, we request ICANN to respond without delay to notifications of changes to the information in the IANA database submitted by registry managers provided they pass the necessary technical checks. Such checks must follow a clear and transparent process according to objective, non-political and publicly available criteria.

We welcome progress to automate the processing of changes to entries in the Authoritative Root Database and the recent announcement by IANA to adopt the e-IANA platform developed by the community. For specific comments on the IANA, please refer to Appendix 1 below.

Q7: Many public and private organizations have various roles and responsibilities related to the Internet DNS, and more broadly, to Internet governance. How can information exchange, collaboration and enhanced cooperation among these organizations be achieved as called for by the WSIS?[8]

CENTR looks to the Internet Governance Forum to provide the arena for global discussion on the issues highlighted by the WSIS. We do not believe that any additional bodies are required.



Appendix 1

Technical Issues regarding the IANA Function

The CENTR community warmly welcomes the progress that has been made within the IANA functions to improve the DNS root server management. We look forward to full automation of the Authoritative Root Management services for those Registry Managers willing to be fully responsible for their entries in the IANA database and Root Server System. Particular reference is made to the Root Management automation document, developed by the community and embodied in the e-IANA system developed by NASK. We welcome IANA's announcement on the 5th July 2006 to adopt the e-IANA platform.

We believe that IANA's role in root management is the technical function and IANA should respond without delay to notifications of changes to the information in the IANA database submitted by registry managers provided they pass the necessary technical checks. Such checks should follow a clear and transparent process according to objective, non-political and publicly available criteria. We urge that a 'self check' mechanism be built in and that rollback facilities are implemented to enable IANA to respond quickly to errors.

There are a number of outstanding technical issues that need to be addressed and resolved by the IANA and the CENTR community will be commenting on these important issues in the near future.