

**To:** Fiona Alexander,  
Office of International Affairs,  
National Telecommunications and Information Administration  
US Department of Commerce

**Subject:** Docket No. 060519136-6136-01, The Continued Transition of the Technical Coordination and Management of the Internet Domain Name and Addressing System

The Internet Architecture Board (IAB) is pleased to be able to provide its comments on the NTIA's request for comments on the "progress to date of the transition of the technical coordination and management of the Internet DNS to the private sector." [1]

The Internet Architecture Board (IAB) remains generally supportive of the ICANN implementation of the DNS White Paper. With this note, we aim to communicate our ongoing concerns with respect to the NTIA implementation of the role architected in that paper.

On this specific question:

"5. 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? "

The IAB notes that the DNS Whitepaper outlined the following activities:

"In the DNS Project, the parties will jointly design, develop, and test the mechanisms, methods, and procedures to carry out the following DNS management functions:

- a. Establishment of policy for and direction of the allocation of IP number blocks;
- b. Oversight of the operation of the authoritative root server system;
- c. Oversight of the policy for determining the circumstances under which new top level domains would be added to the root system;
- d. Coordination of the assignment of other Internet technical parameters as needed to maintain universal connectivity on the Internet; and

e. Other activities necessary to coordinate the specified DNS management functions, as agreed by the Parties."

The IAB has consistently ([2], [3], [4]) noted its concerns that the activity of coordinating assignment of Internet technical parameters is dwarfed by the political implications in the other activities listed above.

The IAB (and the Internet Engineering Task Force, IETF) have never ([5], [6]) accepted that coordination of protocol parameter assignment necessarily includes the activity of making the assignments, as described by the Department of Commerce's implementation of ICANN via the IANA contract:

"First, the Contractor would coordinate the assignment of technical protocol parameters. This function would involve the review and assignment of unique values to numerous parameters (e.g., operation codes, port numbers, object identifiers, protocol numbers) used in various Internet protocols. This function would also include dissemination of listings of assigned parameters through various means (including on-line publication) and the review of technical documents for consistency with assigned values." [7]

This "technical parameters" portion of the IANA RFI describes the management of parameters defined by IETF standards. As part of its standards specification process, each new parameter type definition includes a specification of the method of allocation of parameter values, as well as provision for appropriate technical review and acceptance. Where specific expertise will be required to evaluate any request, the IETF provides a "designated expert" to support the allocation function. These specifications are developed in the IETF's usual international, open, consensus-based e-mail discussion venues. Dispute resolution, when needed, occurs within the IETF organization.

To complete the private sector handoff, it must be made clear that this DNS Whitepaper Project has given ICANN only the task of coordinating technical protocol parameter assignment. The IETF, through its standardization processes, defines how parameter assignment should be authorized and ICANN is delegated to carry out the practical assignment of those authorized parameters only under the terms of a separate agreement [8] between ICANN and the IETF. The IETF expects that ICANN will continue, as part of its coordination activity, to honor that agreement both in spirit and letter. However, the IETF retains the right to terminate that agreement and move its protocol assignment function elsewhere, without prejudice of its support of the ICANN implementation of the DNS whitepaper private sector model.

Sincerely,

Leslie Daigle,  
Chair, Internet Architecture Board.  
c/o Internet Society, 1775 Wiehle Ave., Suite 102 Reston, VA 20190

### ***References:***

- [1] [http://www.ntia.doc.gov/ntiahome/frnotices/2006/NOI\\_DNS\\_Transition\\_0506.htm](http://www.ntia.doc.gov/ntiahome/frnotices/2006/NOI_DNS_Transition_0506.htm)
- [2] <http://www.iab.org/documents/docs/icann-response.html>
- [3] <http://www.iab.org/documents/docs/icann-response-2.html>
- [4] <http://www.iab.org/documents/docs/icann-response-3.html>
- [5] <http://www.icann.org/correspondence/bradner-dyson-25feb99.htm>
- [6] <http://www.iab.org/documents/correspondence/IANA-2006/IAB-RFI-Input.pdf>
- [7] <http://www.fbo.gov/spg/DOC/OS/OAM/Reference%2DNumber%2DDOCNTIARFI0001/SynopsisR.html>
- [8] <http://www.ietf.org/rfc/rfc2860.txt>

### ***Organizations:***

**IAB.** The Internet Architecture Board has a long history but is currently viewed as a senior committee working with the IETF that has both technical (architectural) functions and oversight functions for the development of the Internet. The latter also includes oversight of IANA functions performed for the IETF. See <http://www.iab.org>

**IETF.** The Internet Engineering Task Force is a worldwide and open organization whose mission is to produce high quality, relevant technical and engineering documents that influence the way people design, use, and manage the Internet in such a way as to make the Internet work better. These documents include protocol standards, best current practices, and informational documents of various kinds. See <http://www.ietf.org>