

ETNO Reflection Document - Response to the National Telecommunications and Information Administration of the US Department of Commerce on the Internet Assigned Numbers Authority (IANA)



March 2011

Executive Summary

- ETNO agrees that preserving a stable and secure Internet Domain Name System and management of IP addresses is a top priority, and the IANA functions are critical in achieving that objective.
- ETNO believes that management of the IANA functions should transition from a Government oversight contractual responsibility to that of an independent organisation.
- ETNO believes that ICANN is best served to oversee the IANA function given the representation of all stakeholders within the organization and its specific responsibilities related to stability and security of the Internet which are embedded into its institutional documents.

General comments

The Association of European Telecommunications Network Operators (ETNO)¹ welcomes the opportunity to respond to the Request for Comments on the Internet Assigned Numbers Authority (IANA) Functions issued by the National Telecommunications and Information Administration of the US Department of Commerce (Docket N° 110207099-1099-01),

¹ The European Telecommunications Network Operators' Association (ETNO) is representing 40 major companies, which provide electronic communications networks over fixed, mobile or personal communications systems in 35 countries. ETNO is Europe's leading trade association and its members have substantial Internet operations. More information about ETNO can be found at: www.etno.eu

ETNO fully agrees that preserving a stable and secure Internet Domain Name System (DNS) and management of IP addresses is a top priority for all stakeholders and the IANA functions are critical in that context.

As mentioned in the Notice of Inquiry, the Internet is a global medium supporting economic growth and innovation worldwide, and the framework under which the IANA operates must now fully reflect this fact. The stable and secure functioning of the Internet is a shared responsibility among stakeholders in the Internet community and a specific responsibility of ICANN, as set out in section 2 of the ICANN Bylaws²:

“In performing its mission, the following core values should guide the decisions and actions of ICANN:

1. Preserving and enhancing the operational stability, reliability, security, and global interoperability of the Internet”.

These same obligations are echoed in ICANN’s Affirmation of Commitments (AoC) which notes that decisions made related to the global technical coordination of the DNS should be made in the public interest and must be accountable and transparent³. The AoC goes on to reaffirm the Department of Commerce’s commitment to a multi-stakeholder, private sector led, bottom-up policy development model for DNS technical coordination that acts for the benefit of global Internet users.

The implementation of the AoC and the periodical obligatory reviews defined in the agreement offer an appropriate and efficient way to ensure that ICANN fully fulfils its mission and improves over time. ICANN’s progress and fulfilment of obligations can be publicly monitored and assessed by the community through initiatives such as ICANN’s AoC Responsibilities Inventory⁴ and the formal ongoing review process⁵. Although there is more work to be done, ETNO believes that ICANN has made significant strides in improving its performance in all areas relating to the IANA functions. As such, the IANA responsibilities should fully remain with ICANN and indeed should not fall under any Government oversight which would undermine the necessary independent nature of this technical coordination function. The Internet is a global medium and ICANN should be empowered to act in a way that it considers best meets the needs of its community, respecting the bottom-up process that is hard-coded into its constitutional documents.

² <http://icann.org/en/general/bylaws.htm#1>

³ <http://icann.org/en/documents/affirmation-of-commitments-30sep09-en.htm>

⁴ <http://icann.org/en/reviews/affirmation/responsibilities/aoc-inventory-tracking-brainstorming-oct10-en.pdf>

⁵ <http://icann.org/en/reviews/affirmation/review-teams-en.htm>

ETNO believes that the expiration of the contract between the US government and ICANN must be the next major event after the AoC and just like the formal opening up of ICANN with the AoC, the permanent management of the IANA functions by ICANN will be a great opportunity for more international cooperation, serving better the global public interest.

Specific comments

1. Interdependency of the IANA technical functions

ETNO believes that the IANA technical functions, namely the coordination of the assignment of technical Internet protocol parameters, certain responsibilities related to Internet DNS root zone management, and the allocation of numbering resources are a combined set of interdependent technical functions that need to be managed by one entity. A splitting up of these functions would introduce complexity and cannot be justified on the grounds of technological or marketing developments. The system as it stands today works – all stakeholders are represented within the ICANN community and stability and security of the Internet is ICANN's core concern.

2. Entities influencing the performance of the IANA functions

ETNO agrees that policies and procedures developed by technical Internet communities like the Regional Internet Registries and the ccTLD operators have an impact on the performance of the IANA functions. These technical communities are fully represented within ICANN through the appropriate bodies (such as the Country Code Names Supporting Organisation). This representation demonstrates that the IANA functions are an integral part of ICANN and that the necessary co-operation and co-ordination of a variety of technical groups is already in play.

3. Other issues

The specific questions at the end of the Notice of Inquiry, on root zone management requests (question 3), on performance and metrics

improvement (question 4), on process improvement (question 5), and on additional security considerations (question 6), are valid and should be addressed within the ICANN policy development process, with the involvement of all stakeholders, including Governments represented in the Governmental Advisory Committee.