

ANRT (.ma Registry) comments on the Draft 2016 African Domain Name System Market Study

1. ANRT welcomes the ICANN initiative, which aims to set up a permanent observatory that will enable the Internet community, particularly in Africa, to be aware about the growth, development and new needs concerning DNS industry in Africa.

However, we propose to review some parts of this report, including the approach taken to assess the level of the development of a ccTLD Registry (and then the ranking of ccTLDs). Indeed, we propose to consider firstly criteria that have a direct influence on the development of domain names. These include the key success factors of a registry, as listed in the report, such as the Registry Governance Model (3R or 2R), the flexibility of Registry procedures, efficiency of the management system (automation, response time, registrars support ...), deployment of DNSSEC and support of IPv6 by the registry and registry infrastructure (redundancy, availability, etc.).

Furthermore, we emphasize the irrelevance of the criteria related to the existence of an IXP, since the correlation between the presence of an IXP and the development of a ccTLD is not demonstrated. The present report illustrates examples of countries that, although they have IXP, do not have a developed domain name industry and vice-versa;

Actually, the deployment of IXP could be essential for the growth of the Internet connectivity in a country but it has no direct relationship with the development of domain names in such country.

2. The irrelevance of the criteria related to the number of IPv4 addresses: the relationship between this number and the number of domain names registered is not demonstrated in the graph presented in the report (page 78). Indeed, in some countries that have more IPv4 addresses than others, the number of domain names is not important, and vice versa.
3. Concerning the ranking of countries based on the number of domain names registered under the ccTLD, the report should not take into consideration the registries that offer domain names for free.
4. The number of **.ma** domain names, as at the end of March 2016, presented in the report is not correct. The correct number is **60.689** domain names.
(At the end of 2016 the number is **63.586**)
Also, ANRT (.ma registry) publishes, on its website www.registre.ma, a counter that displays in real time the number of registered domain names.
5. We have never had an Internet shutdown in Morocco (page 104).
6. The **.ma** domain names fees, as presented in the report, are high compared to the reality: the minimum fee is 120 MAD (Moroccan Dirhams/No tax included), equivalent to \$12. In general, these fees vary among the top 10 registrars managing 91% of the **.ma** domain names from 120MAD (\$12) to 350MAD (\$35) per year. The average fee applied by first 3 registrars (managing 61% of registered domain names) is 166 MAD (equivalent of 16.7 \$).
The list of **.ma** registrars is available here: <http://www.registre.ma/prestataire/prestataires>. This list contains the websites of

registrars.

7. "Premium" domain names: the Moroccan Registry (ANRT) applies a same fee to register **.ma** domain names (No premium fees).
8. Morocco (MA) is mentioned twice on the graph concerning the number of datacenters per country (Page 71), with 5 and 7 datacenters.
9. The IDN ccTLD "المغرب" has been delegated to ANRT in 2011, instead of 2014 (page 119).