

Asia Pacific Top Level Domain Association (APTLD) response to NTIA Notice of Inquiry (NOI) on the IANA functions

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TO: Fiona M. Alexander, Associate Administrator, International Affairs National Telecommunications and Information Administration (NTIA) U.S. Department of Commerce

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About APTLD

Asia Pacific Top Level Domain Association (APTLD) is a membership based organisation for ccTLD (country-code Top Level Domain) registries in the Asia Pacific region. APTLD was informally established in 1998, and in 2003 legally established as a membership society incorporated in Malaysia. APTLD works as the forum of information exchange regarding technological and operational issues of domain name registries for ccTLDs.. Also, APTLD acts as an interface to other international Internet coordinating bodies including Internet Corporation for Assigned Names and Numbers (ICANN), APNIC and the Internet Engineering Task Force (IETF). APTLD fosters and elevates participation of AP ccTLDs in these global fora, as well as acting in the best interest of APTLD members in global Internet policy development processes.

Currently, APTLD has 60-odd members in total; including 36 AP based ccTLD's..

Comments

APTLD welcomes the opportunity to provide comments in response to the National Telecommunications and Information Administration's (NTIA's) Notice of Inquiry on the IANA functions. APTLD shares and supports NTIA's commitment to preserving the security and stability of the DNS. At the same time, we echo NTIA's view that the security and stability of the DNS are a shared responsibility among all stakeholders in the Internet community, nevertheless, we are of the view that the topic of reform and possible separation of IANA functions should be approached with caution and extensive stakeholder consultations, in order to avoid unintended fragmentation and disruption of the current services.

APTLD conducted a survey among its members specifically for this NoI. Our comments on the questions raised in the NoI are largely based on the survey results.

1. The IANA functions have been viewed historically as a set of interdependent technical functions and accordingly performed together by a single entity. In light of technology changes and market developments, should the IANA functions continue to be treated as interdependent? For example, does the coordination of the assignment of technical protocol parameters need to be done by the same entity that administers certain responsibilities associated with root zone management? Please provide specific information to support why or why not, taking into account security and stability issues.

APTLD recommends NTIA take a most cautionary approach to this issue. There are merits to having a single entity performing the IANA functions, and avoiding overcomplicating the process. APTLD appreciates the historical reasons behind having a single entity to perform a range of interdependent technical functions.

APTLD agrees there are 4 distinctly different categories included in the IANA function, namely the database management of the root zone file for ccTLDs, gTLDs, IP addresses, and the fourth area of technical databasing such as that required for .arpa and IETF purposes. From the technical perspective, the updating and maintenance of the IANA database is potentially best provided by a single operator and under the ICANN umbrella the IANA technical functions appear to be operating moderately efficiently and effectively and APTLD notes ongoing improvements in IANA services. APTLD recommends that there should be a clear distinction between the technical IANA function and the policy development processes required to provide the necessary guidelines for the IANA function. Some of the policy processes are discreet to the individual 4 areas in which IANA functions, and some are intertwined across these 4 areas.

APTLD suggests that if ICANN is able to demonstrate a clear separation and distinction between the policy development processes and the IANA technical functions, whereby all affected stakeholders are involved in the policy development processes, then some greater autonomy from the US Government for ICANN to manage IANA functions would be appropriate. To elaborate, for example, within ICANN the ccNSO is accorded the responsibility for the development of policies applicable to the ccTLDs who are members and such policy function should be performed by ccNSO clearly separated from IANA functions. However less than half

of the ASCII ccTLDs are members of ICANN's ccNSO, and therefore any policy development affecting the ccTLD world must include ccTLDs both within and outside of the ccNSO. APTLD would further suggest that increased independence from the US Government for IANA would be appropriate for the ccTLD community,

2. The performance of the IANA functions often relies upon the policies and procedures developed by a variety of entities within the Internet technical community such as the IETF, the RIRs and ccTLD operators. Should the IANA functions contract include references to these entities, the policies they develop and instructions that the contractor follow the policies? Please provide specific information as to why or why not. If yes, please provide language you believe accurately captures these relationships.

In accordance with the multi-stakeholder approach advocated by the ICANN and generally accepted by the entire global Internet community, APTLD recommends that references should be made to the policies developed by the ccTLD community in the IANA functions contract. The IANA contractor should acknowledge that policies developed by the ccTLDs are legitimate and relevant in their respective local Internet communities and governments, and consistent with the *U.S. Principles on the Internet's Domain Name and Addressing System*.

3. Cognizant of concerns previously raised by some governments and ccTLD operators and the need to ensure the stability of and security of the DNS, are there changes that could be made to how root zone management requests for ccTLDs are processed? Please provide specific information as to why or why not. If yes, please provide specific suggestions.

In view of the introduction of the DNSSEC and new TLDs, the automation of processes relating to IANA's root zone management would certainly improve the efficiency of routine zone management changes, and should be given the highest priority.

DNSSEC deployment has introduced a severe timing issue to the root zone management that may affect the TLD zone visibility on the Internet. For example, if a TLD registry put a wrong DS record value in the root zone, such TLD zone disappears from the Internet. In such a case, such DS record should be deleted immediately by the root zone management following the urgent demand by the TLD operator. Such process should not be intervened by non-automated process to

achieve the immediate consequence. As in this case, secured, immediate, and automated root zone management function is mandatory.

APTLD notes that within the ccNSO a working group has been formed to provide a Framework of Interpretation for the delegation and redelegation of ccTLDs that will help significantly to make these processes more transparent. With this process underway we see no need at this juncture for the NTIA to consider an alternate policy development entity to ICANN to address the shortcomings in the treatment of ccTLDs in regard to the critical issues surrounding delegations and redelegations.

4. Broad performance metrics and reporting are currently required under the contract. Are the current metrics and reporting requirements sufficient? Please provide specific information as to why or why not. If not, what specific changes should be made?

About half of the APTLD members found the IANA performance to be acceptable in terms of process and timeframe. Nevertheless, APTLD supports the development of a service level agreement for the IANA services that includes the framework parameters and timelines. The agreement should be accompanied by detailed documentation that explains the root zone management functions. However, APTLD suggests avoiding the implementation of an overly complicated and bureaucratic reporting regime of the IANA functions.

Furthermore, maintaining an up-to-date website on the requirements of the various services provided by IANA is crucial to the further speed of the services provided.

5. Can process improvements or performance enhancements be made to the IANA functions contract to better reflect the needs of users of the IANA functions to improve the overall customer experience? Should mechanisms be employed to provide formalized user input and/or feedback, outreach and coordination with the users of the IANA functions? Is additional information related to the performance and administration of the IANA functions needed in the interest of more transparency? Please provide specific information as to why or why not. If yes, please provide specific suggestions.

APTLD members are generally satisfied with the feedback and coordination mechanism of the IANA. Reiterating our comments to question 4, documentation should be provided by IANA detailing the functions, framework parameters and timelines for better predictability and transparency of the IANA processes.

6. Should additional security considerations and/or enhancements be factored into requirements for the performance of the IANA functions? Please provide specific information as to why or why not. If additional security considerations should be included, please provide specific suggestions.

APTLD members are of the view that better authentication process should be introduced to the receipt and management of the change requests, as email authentication is inadequate. We also suggest periodic auditing of the security provisions of the IANA function by external, independent, specialised auditors against a relevant international standard. Also a documented urgency process for customers to follow if they are experiencing an emergency, which includes private emergency contact numbers for the operator to be contacted on.

Furthermore, APTLD contests that it is an essential development for IANA to have a published disaster recovery plan, that is regularly consulted upon.

APTLD thanks the NTIA for providing the opportunity to input into the future of the IANA function.

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