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AT-LARGE ADVISORY COMMITTEE

On 21 December 2023, the Public Comment opened for the [At-Large Workspace: Draft Final Report of the 2023 Africa Domain Name Industry Study](#).

On [Monday 29 January](#), Hadia Elminiawi, AFRALO Chair, held a call open to all AFRALO members to review and discuss the Draft Final report. The following AFRALO members volunteered as penholders: Hadia Elminiawi, Hervé Hounzandji, Levy Syanseke and Adebunmi Akinbo.

On [Wednesday, 31 January](#) 2024, Hadia Elminiawi presented an overview of the [Draft Final Report of the 2023 Africa Domain Name Industry Study](#) and the main points from the perspective of AFRALO during the At-Large Consolidated Policy Working Group call.

AFRALO approved the statement by consensus on Monday, 5 February 2024.

As a result of these AFRALO and At-Large community processes, the ALAC notes that it strongly supports the statement developed by AFRALO.

AFRALO response to public comment. “Draft Final Report of the 2023 Africa Domain Name Industry Study”

The Africa Regional At-Large Organization (AFRALO) sincerely thanks William Stucke and Mark Elkins for this study. This study shows the current state and growth of Africa's Internet ecosystem. The contents of the report highlight the African DNS ecosystem, key features of the African DNS market, key success factors, and provide an analysis of the domain name uptake across our continent and a growth outlook. Furthermore, the research team established a DNS observatory in Africa.

AFRALO and the At-Large Advisory Committee (ALAC) appreciate the opportunity to provide feedback on the “Draft Final Report of the 2023 Africa Domain Name Industry Study” and would like to thank ICANN for commissioning the study. We also extend our appreciation to the company and team responsible for conducting the research, acknowledging their comprehensive exploration and the resulting conclusions and recommendations.

The study provides analysis of various factors influencing the domain name industry in the region, encompassing factors such as infrastructure, governance, security measures and policy and regulatory frameworks. Moreover, it sheds light on the domain name market economics, exploring factors like supply and demand, costs and benefits and incentives which can explain many of the decisions that registrants make.

Upon reviewing the report we highlight the following points:

- I. Section 5: The key features of the African DNS Market

Current figures :

The African continent has 54 country code ccTLDs and six IDNs. As of November 2023, there are over 4.3 million domains under African ccTLDs and 1.4 million in gTLDs. High internet costs, limited infrastructure, and mobile-centric access hinder domain demand. Registrations are concentrated in countries with developed web sectors. Africa has 51 ccTLD Registries and 13 ICANN accredited registrars. The top 10 ccTLDs hold 92% of domains. The annual DNS industry is valued at around USD \$1.5 billion. Local providers have growth opportunities, with an average annual growth projection of 12%. Most registrants prefer dealing with local registrars.

5.1.3 The influence of politics on telecommunications and the Internet

The study's internal analysis proposes a compelling association between Internet freedom and the volume of registered domain names. However, despite our inclination to support this assertion, upon examining a more extensive dataset derived from Freedom House's 2023 "Freedom on the net" rankings, not limited to the African region, we find that this conclusion doesn't hold true. Notably, top level domains such as .ru, .cn, and .br, rank among the top 10 ccTLDs in terms of reported domain names, contradicting the study's deduction. Two of the ccTLDs are categorized by the Freedom House report as "not free," while the third is labeled as "partly free." The team's deduction and visual aids rely only on the Freedom House's 2023 report. Therefore, we are unable to discern a consistent correlation between Internet freedom and the quantity of registered domain names, as suggested in the report. Furthermore, we could put forth suggestions explaining why the number of registered domain names may not be correlated with Internet Freedom. However, it is important to note that delving into this topic would be beyond the scope of this public comment.

5.9 The user experience

Figures 5-12, representing the "3R" model, does not depict any registrars, it only shows the registrant, reseller, and the registry just as the 2R model.

5.9.8 Barriers to growth in the DNS industry

The distribution of the main responses provided by the report suggests that price emerges as the most significant barrier to buying domain names, surpassing challenges like low Internet penetration and convenient payment mechanisms. While the report implies that reducing DNS prices could boost domain name registrations. Our interpretation of the data suggests that a reduction in prices may result in increased registrations only if it is part of a broader strategy that includes infrastructure development, easier payment methods, awareness campaigns and supportive regulatory frameworks. It is crucial to recognize that the connection between domain name prices, income and inflation rates significantly influences domain registrations, presenting correlations with various other factors such as education, gender, age and other elements.

II. Section 6: Analysis of Domain Name uptake across the continent

The study group developed a Country Success Index (CDSI) based on Number of domains registered under the ccTLD.

- Number of gTLD domains identified as having an African Registrant.
- Number of web pages indexed by Google.
- Price of registration (Lower is better) Comment: has to be linked to other factors mainly population income and inflation
- Number of Registrars.
- Number of locally hosted websites.
- Figure of Merit (FoM) derived from the presence of one or more functioning IXPs.
- Internet usage as a percentage of the population.

While we overall agree with the presented success index we observe that the pricing should be correlated with additional economic variables such as currency devaluation, inflation rates and income.

III. Section 7: Summary of Best Practice Recommendations for Registries

Although we generally endorse the presented best practices we refrain from endorsing a specific price range. As previously mentioned on a local scale the price of a domain name is linked to various economic factors encompassing inflation rates, exchange rates and economic levels.

In conclusion, we express our support for the creation of the DNS Observatory and promote more IXP in Africa. The Observatory has the potential of being a valuable tool to gauge the expansion of the domain name industry in the region and recognize its evolving trends.

The ALAC and AFRALO note our appreciation for the opportunity to comment and we are hopeful that our input will be taken into account.