

# ALAC Comments on NTIA NOI Question 2 - March 2011

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.

## Proposed Reply

The challenge is to internationalize the management of the domain name system in furtherance of the greater global public interest. Membership in the named technical communities is drawn from every area and region of the globe. It would be useful to note that the Internet is THE enabler of the work processes and acculturation of these communities of practice. To the extent that the IANA functions are central to the stability, availability and continued expansion of a global interoperable Internet and to the extent that we embrace the Internet as a critical global public infrastructure and public goods, a thoughtful recognition of these communities to names and numbers administration would inure to greater opportunities for internationalization. Contractual references and obligations to the output of these and like communities whose work significantly impact continued stability, availability and internationalization of the domain name system, is a good a good move, but only under specific conditions.

Any contract would make references to the different entities but should not summon to follow the different policies developed by the entities in question. The IANA functions contract should ONLY include references to the entities such as the IETF, the RIRs and ccTLD operators but NOT policies that these entities should develop, neither the instructions that the contractor should follow these policies.

Further, given the operational culture and open policy-making framework that are definitive attributes of these communities, this action will add a quotient of transparency to the functional administration of IANA.

The success of the Internet lies in the fact that it is characterised by a minimum of regulation or by self-regulation. The public in general should never have the impression that the US Government is trying to influence the policies of the entities through the IANA functions. Most of all, if any contractual arrangements were drawn up, they should not become an over-bearing burden.