

ALAC Comment on NTIA NOI Question 1 - March 2011

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.

Proposed Reply

Historically, the IANA functions have included (but not been limited to):

1. The coordination of the assignment of technical Internet protocol parameters;
2. the administration of certain responsibilities associated with Internet DNS root zone management;
3. the allocation of Internet numbering resources; and
4. other services related to the management of the .ARPA and .INT top-level domains.

The IANA makes technical decisions concerning root servers, determines qualifications for applicants to manage country code TLDs, assigns unique protocol parameters, and manages the IP address space, including delegating blocks of addresses to registries around the world.

The responsibilities encompassed within the IANA functions require cooperation and coordination with a variety of technical groups and stakeholder communities. For example, protocol parameters are developed through and overseen by groups such as the Internet Engineering Task Force (IETF) and the Internet Architecture Board (IAB), policies and procedures associated with Internet DNS root zone management are developed by a variety of actors (e.g., the Internet technical community, ccTLD operators, and governments) and continue to evolve, and policies and procedures related to Internet numbering resources are developed within the RIRs.

Since February 2000, The Internet Corporation for Assigned Names and Numbers (ICANN) performs the IANA functions, on behalf of the U.S. Government, through a contract with NTIA.

ICANN should continue performing these functions for the following reasons:

- Experience, maturity and know-how

The ICANN, as a single entity, has so far led the IANA functions with all the seriousness possible and has respected the contract with the US Government to the letter.

- Security and Stability

The IANA functions led by ICANN have proved its independence from Governments lobbies, thereby confirming the security, stability and success of the Internet. We fear that these functions led by any other entity might fragment or otherwise "break" the Internet.

- Independence has brought development.

The Internet has grown rapidly and serves millions of users; one of the reasons of its success is that ICANN has so far undertaken the IANA functions in all independence. This has prevented any one entity or government from "capturing" the Internet

- Central Administration and Co-ordination.

The administration of DNS names and numeric addresses is a notable exception to the principle of distributed management because the current technology requires some central administration and coordination functions. ICANN performs this function well.

- Internet Self Regulation and ICANN's Collaborative Model.

ICANN plays an important role in the self-regulation characteristic of the Internet, and in coordinating certain aspects of the collaborative Internet model. ICANN is an essential organization that helps manage and administer various functions of the Internet's development and management including the IANA functions.

A separation of the tasks described above would only risk triggering a compartmentalization of those functions into silos, with incoherent collaboration brought forth by those silos. Most of these functions have a heavy element of cross-synchronization of tasks and this would be lost if the functions were separated into different organizations.

As a result, the logic that tasks under the IANA function are interdependent remains compelling. We cannot find a rationale for separation of the tasks that would inure to better management, more sure-footed coordination or greater stability and availability of internet resources.

At this point in time, there is no advantage to have the functions separated. There may be reasonable argument to separate them in the future but leaving them inter-dependent while following the multi-stakeholder model.