



COUNCIL OF EUROPEAN NATIONAL TOP LEVEL DOMAIN REGISTRIES

Mr Paul Verhoef  
Vice President Policy Development Support  
ICANN  
Brussels Office

29<sup>th</sup> April 2005

Dear Paul,

Thank you for your letter of the 18<sup>th</sup> April, which I was surprised to receive.

I regret Vint and I were unable to meet in Mar del Plata due to an unfortunate breakdown in communication, and hopefully we will be able to schedule a mutually convenient time during the Luxembourg meeting.

As we both know, this is an important time for ICANN in the context of the WSIS, the finalisation of the ICANN strategic plan, and the review and attainment of the current MoU. The next 12 months may well be critical in determining if ICANN is to fulfil its mandate and become a representative forum for all the key DNS stakeholders.

We would like to be updated regularly, and I would reiterate our support for any efforts by ICANN in this respect. As you know, CENTR's view is that if ICANN is to be able to fully engage the majority of the ccTLD community, the community needs a clearer definition of ICANN's scope, as well as an explicit and well-defined list of activities that fall within this scope. Without this clarity, and the engagement of all ccTLDs, ICANN will struggle to provide a real bottom-up approach, and thereby to provide such a comprehensive and inclusive DNS forum.

I would reiterate that the CENTR community stands ready to assist ICANN, but I must point out that in your letter you seem to have missed the key information/clarifications that the CENTR community requires of ICANN:

- How does ICANN intend to modify its Strategic Plan to take account of stakeholder comments? In our view this means a limited mission and focussing resources on doing a few things well (namely the IANA service), and a forum for inclusive bottom-up consensus building with peer-to-peer relationships. To achieve this, I re-confirm CENTR remains willing to assist you focus the Strategic Plan at any time.
- Another concern was raised during the wwTLD meeting in Argentina, when a significant number of ccTLDs expressed the view that ICANN was doing too many things that were outside of ICANN's core remit. One specific example was ICANN wanted to be the holder of the iDN Code Point Document. .PL indicated that the iDN technical standards had been developed by the IETF and that countries knew their language tables and frequently published them domestically, in a robust and sustainable manner. As you may know, ICANN's attempt to capture this issue was raised during the ITU meeting in Moscow and, as a result, .PL agreed to assist the ITU be the depository for the language tables. In addition, CENTR had already established work in this area, but it was decided that this reference material should just be for Registry community use, see <http://www.centri.org/docs/2003/11/centri-ga20-idncodepoints.pdf> In short, CENTR feels that there is no need for a formal depository as scripts have already been recorded by Unicode Consortium, National forums and the user community.

The main concern remains that if ICANN does not limit its activities and become efficient at what it should be doing, more ccTLDs will favour other forums. As reiterated in a recent email to the CENTR members it is the ITU that will say ccTLD managers are abandoning ICANN and that perception/spin will come from the ITU and not from CENTR.

Contrary to the assertions you made in your letter, you will see from my interview with Computer Wire, and other publications <http://www.computerwire.com/industries/research/?pid=D48AC0EE%2DA571%2D4EFC%2D82C3%2D51D8301F7E4E>, that I stressed that ICANN should be our preferred service provider.

As for the ICANN-IANA activities, you miss-quote me. I would like to recall what I said during the Public Forum (copied from the ICANN scribes notes <http://www.icann.org/meetings/mardelplata/captioning-public-forum-2-07apr05.htm>) : " I'D ALSO LIKE TO THANK DOUG BARTON FOR HIS PRESENTATION. I ALSO CONCUR THAT THERE HAVE BEEN SOME CHANGES AT THE IANA AND THEY ARE WELCOME. I ALSO UNDERSTAND THAT THE CENTR COMMUNITY AND THE CCTLD COMMUNITY STAND READY TO HELP THE IANA IN THE FULL AUTOMATION OF THE PROCESS THAT WILL ENABLE US *TOGETHER* TO DEMONSTRATE HOW EFFICIENTLY THINGS CAN BE RUN. "

A major concern however is that, prior to ICANN coming into being, the previous contractor for the IANA services undertook simple tasks like changing name servers addresses within 24 hours in a fully automated manner. This is just not the case nowadays and inefficiency is creeping in.

Whilst Barbara Roseman is a welcome addition to the IANA staff to assist them run it efficiently, we remain prepared to offer financial support, equipment, and staff training for a fully automated IANA to once again become an efficient servant of the community. Running the IANA as an efficient clerical function on behalf of the community is not a complicated task. CENTR registry managers undertake authenticated DNS changes/information updates on behalf of their customers in their thousands, every day of the week and therefore understand the scale of the IANA task better than anybody. For this reason, we are perhaps better placed than anybody to help ICANN run the IANA more efficiently.

In response to your comments about IANA problems, and following a message I sent to the CENTR community to gather more information on the reliability and efficiency of IANA activities, I am indeed able to provide you with further details on some of the problems ccTLD Managers around the world have experienced. In short, the current IANA process does not carry out updates in a timely manner on a reliable enough basis, resulting in the IANA database frequently being inaccurate. I have now received a number of responses, which we will continue to collect and then catalogue, to identify if there are some common themes which could be fixed:

- A Registry from Northern Europe advised it took 4 months (and 2 reminders) to update an organisation address change, eventually undertaken in March 2005
- A Registry from Southern Europe advised it took 7 months to make a "crystal-clear" change of Manager in the IANA eventually concluded in December 2004
- A mid-European Registry advised that they could not include IPv6 Name Servers, and IANA did not have native IPv6 to test the name servers. I believe this has now been fixed, but it is questionable that ICANN should hold up a request because it is lacking in competence.
- A Registry in Asia advises that one request took one week, whilst another took 1 month with both being concluded in March 2005.
- A Registry in Asia advises that it took nearly 2 months and 3 reminders to effect the requested change in April 2005.
- A Registry in Eastern Europe advises that it took 4 months to effect the requested change, eventually completed in April 2005.
- A Registry in Latin America advises it took 6 weeks to effect a straight forward change, with completion in December 2004.

Additional information will be contained in the report, which will be made available to you once completed.

As part of providing a level of transparency without compromising the operational reputation of any specific ccTLD Registry it is important that independent periodic reviews of this nature are regularly carried out, accurately recording facts and identifying problems so as to ensure a constructive approach to problem-solving.

ccTLD Registries must have regard for local culture and legal frameworks, linguistic requirements and operating environments and such diversities must be considered along side global values, whilst satisfying the demands and market conditions of the internet community serviced by the Registry.

With reference to the ccTLDs-ccNSO matters, it is clear that ICANN's approach of attempting to insert itself as a quasi-regulator of ccTLD Registries is fuelling the concerns of many sovereign nations who feel they cannot accept a situation where they would effectively be subject to oversight by a United States private-sector company.

CENTR has been trying to help defuse these concerns, but we would appreciate more recognition of our efforts (and cooperation rather than competition) from ICANN to achieve this. ICANN must realise that the original IANA process recognised that subsidiarity, national sovereignty and local determination/service provision were the over-riding core principles that needed to be respected. The ccTLDs and IANA were around a long time before ICANN and, as a relative late-comer, ICANN needs to respect the legitimate sensitivities of existing DNS stakeholders and national governments.

Nevertheless, the majority of ccTLDs would like ICANN to improve the relationship with their community but need recognition of their legitimate concerns for this to happen. The assertion that the ccNSO is functioning properly unfortunately comes not from the majority of ccTLDs, but from the small number (less than 15% of the global ccTLD Community) that have joined the ccNSO to date. Notwithstanding this reality, the last version of the ICANN Strategic Plan still seeks to maintain that "at the global level, ccTLD managers participate through the ccNSO". This is the kind of assertion that does little to convince ccTLDs currently outside the ccNSO that ICANN is listening to them.

That said, some CENTR members had an informal meeting with the Chair of the ccNSO and presented him with a copy of the letter we sent to you on the 4<sup>th</sup> April (<http://www.centr.org/docs/2005/04/comment-ccnso-process.pdf>). The meeting was quite useful and, if all of the proposals contained within that document are adopted, I am optimistic that many CENTR members will join the process. Unfortunately however, the ccNSO story so far reminds me of one of the key issues Stuart Lynn referred to when indicating that ICANN v1 had failed, when he said "too much process over progress". For this reason, if changes are not made to the current process, I am afraid the perceived risks for ccTLDs will almost certainly out-weight the perceived benefits. I must stress that if it is to become representative, the ccNSO must focus on becoming a non-threatening forum for ccTLDs to exchange information and develop non-binding, helpful Best Practices and not give the impression that it is a clearing house for harmonising ccTLD practice under ICANN supervision.

We therefore wish the ccNSO well in its reform and look forward to assisting it to create a more appropriate framework.

In the light of looking to a profitable, constructive and open dialogue, targeted to include all the wishes of the ccTLD community as much as possible, I would therefore like to reiterate that CENTR members are willing to work with you and ICANN staff in developing a Strategic Plan that is mutually beneficial. We stand ready to assist the IANA in its efforts to provide an automated service with no single points of failure or capture, and we look forward to working with all at ICANN on a peer-to-peer relationship so stability and robust operations may be assured.

I look forward to meeting you again before ICANN Luxembourg, and I trust you will find this information helpful.

With best regards,

Yours sincerely,

Paul M Kane  
Chairman of the Executive Committee.

cc.: Vinton Cerf, Chairman of the ICANN Board;  
Doug Barton, General Manager IANA;  
Giovanni Seppia, General Manager CENTR;

Paul Twomey, President and CEO  
Chris Disspain, Chairman of the ccNSO  
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