

# Staff Report of Public Comment Proceeding

## Draft 2016 African Domain Name System Market Study

**Publication Date:** 19 May 2017

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### Public Comment Proceeding

Open Date: 11 Mar 2017

Close Date: 5 May 2017

Staff Report Due Date: 19 May 2017

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### Section I: General Overview and Next Steps

The purpose of this public comment proceeding is to seek input and feedback from The Domain Name and Internet Community, interested parties and individuals on the draft 2016 African Domain Name System Market Study Report. Feedback received will be incorporated into the draft report before the final Study Report is developed

### Section II: Contributors

*At the time this report was prepared, a total of 10 community submissions had been posted to the forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.*

#### Organizations and Groups:

| Name   | Submitted by         | Initials |
|--|----------------------|----------|
| ALAC   | ICANN At-Large Staff |          |
| Registries Stakeholder Group (RySG)  | Stéphane Van Gelder  |          |
| Direction de l'Economie Numérique<br>Ministère de l'Industrie, du Commerce, de<br>l'Investissement et de l'Economie Numérique<br>Maroc | Nouar Belaid         |          |
| ANRT (.ma registry)  |                      |          |
| SACF   | William Stucke       |          |
| The ICANN GNSO Business Constituency   | BC                   |          |
| Non-Commercial Stakeholders Group<br>(NCSG)  |                      |          |

#### Individuals:

| Name          | Affiliation (if provided) | Initials |
|---------------|---------------------------|----------|
| Lesley Stones |                           | LS       |

|              |  |    |
|--------------|--|----|
| Isaac Maposa |  | IM |
| Paul Hjul    |  | PH |

### Section III: Summary of Comments

*General Disclaimer: This section intends to summarize broadly and comprehensively the comments submitted to this public comment proceeding but does not address every specific position stated by each contributor. The preparer recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).*

[SUMMARY]

General comments:

1. The results of the Study are largely as expected
2. Many people expect ICANN to consider the recommendation for the establishment of a DNS observatory
3. It is often useful in research projects such as this one to offer an hypothesis before conducting the survey that would justify and frame the criteria for selection
4. The ALAC supports the establishment of a DNS observatory to track changes and maintain statistics in the use of Domain Names in Africa and to follow its evolution
5. The report gives many inputs that should be translated into an action plan, and deeper collaboration with both potential and key actors in the region.
6. Lack of Privacy support in Domain Name registration may not be a big reason for limited registration
7. Proxy services could be hard to implement as this could not be allowed by most of the policies of the ccTLD registries in Africa
8. Section 5.4.1 et 5.4.2 mention the consequence of high cost for infrastructure but it would be interesting to also know why are the costs high
9. Good National Policy and Regulatory Bodies could also impact positively on the DNS market
10. The Report mentions Morocco as part of countries with “Internet Shutdown” and this seems not true
11. The report didn’t provide information on business environment in various countries even though it has an impact on the DNS business.
12. The LEGAL framework is not defined in many countries and this is certainly not in favor of the development of the DNS Market. The report didn’t cover this aspect
13. Some criteria should not be linked to the development of ccTLD such as Existence of IXP and the number of IPv4 addresses,
14. Some country statistics are not accurate (on .ma registration for example)
15. The study didn’t provide enough on the impact of new gTLD program; current reports on the evaluation of the new gTLD programme could be useful to anticipate potentials for Africa domain name uptake.

Some proposed corrections

16. The footer of the document posted for comment does not match the report’s version date
17. The ccTLD for Eritrea is ER (<https://www.iana.org/domains/root/db/er.html>) (page 12)
18. “Org.zw” and not “org.za” on page 143

Recommendations

19. Data collection methods needs improvement in future studies
20. Review all countries data (.ma has provided links in his comment to get accurate information)
21. Specific recommendation on IP, new gTLD and other issue by some of the comments on the public comment page

## Section IV: Analysis of Comments

*General Disclaimer: This section intends to provide an analysis and evaluation of the comments submitted along with explanations regarding the basis for any recommendations provided within the analysis.*

### [ANALYSIS]

1. The idea of a DNS observatory has a strong support from the community. This was one of the objective in commissioning this study.
2. Most of the comments are in line with remarks already made by our team

Staff is adding the following comments and suggestions

*SACF to Confirm the Reference to A4AI on the 2017 Report, and not 2015 as used in the document. And why not ITU stats as opposed to the more generic Internetstats*

#### **Other comments:**

*Page 10: "IXPs7" could be a typo error to look at*

*Page 11: Data from March 2016 indicates that a total of just over 4.1 million domains are active under the African ccTLDs. "Note that according to responses to the survey, the use of IDNs is more widespread. Analysis of the responses shows that at least 46% of Registries offer the non-Latin script and more than a third of Registrars (34%) do." Important to mention if this is Globally or just in Africa*

*Page 12: the draft report says "Additional gTLD zone extracts have recently been received. These domains are currently being analysed and the full results will be included in the Final Report of this Study". We hope to see more information in the final report*

*About 73% of the total annual revenue on the continent is made by just ten countries (South Africa, Morocco, Nigeria, Zimbabwe, Egypt, Tanzania, Libya, Somalia, Cameroon and Ivory Coast) - -It will be good to provide the source*

*Page 15: "There must in addition be a sufficient number of Registrars - at least 20." How did you arrive at 20? How about the 3-R Model as the best?*

*Report advice that rules requiring compliance IP laws be removed, Please provide the reason*  
*Page 17 : " in association with " correct to say that?*

*Page 19 : such as Afiliias and 101 Domains . Meaning of "101 Domains"*

*Page 33 : Should mention the period of the statistic as this information is not static and review for accuracy*

*Page 34: Refers to 2014 GSMA report. Is there not a more recent report from GSMA?*

*Page 37: Figure number to be inserted. Applies also to figure on other pages*

*Page 39: Numbering issue 5.3.1.1 without 5.3.1.2*

*Page 74: Western Sahara on the map could be an issue for Morocco!*

*Page 109: Good to have the number of registration for ccTLD under Domain Hacks*

*Page 111: Figures in the Africa DNS fee structures to be checked (ex. Fee from .tg Togo is normally lower than shown in the table)*

*Page 120: More updated table on IDN is available on from ICANN's website*

*Page 122: Need to check again if the graph is "correct"*

*Page 187: Glossary to be inserted in the final report*