July 16, 2018

Re: DEPARTMENT OF COMMERCE, National Telecommunications and Information Administration Notice of Inquiry on International Internet Policy Priorities (Docket No. 180124068–8068–01) - International Internet Policy Priorities

The Canadian Internet Registration Authority (CIRA), welcomes the opportunity to comment on the on the above referenced Notice of Inquiry. CIRA is a member-based not-for-profit organization, best known for managing the Canadian ccTLD, .CA, as well as for developing and implementing policies that support Canada's internet community, and representing the .CA registry internationally. We would like to comment in particular on question D. under the Multistakeholder Approach to Internet Governance "D. Should the IANA Stewardship Transition be unwound? If yes, why and how? If not, why not?"

The internet is not a single entity, but rather a system of over 61,000 autonomous networks. They are able to interact with each other because they have agreed to use a common numbering and addressing system, so-called critical internet resources, and the domain name system (DNS). No single entity, whether it be government or someone else, can 'control the internet' but the inappropriate use of, or needless limitations on, the access and use of these critical internet resources and the DNS can have huge negative implications for this worldwide system.

Everyone involved with the internet is aware that it was developed under the auspices of ARPA but it has been constantly improved by researchers the world over, through such processes as the IETF. When the commercial applications of the internet came to be understood, the U.S. government had the foresight to recognize that such complex and rapidly changing systems could not be effectively managed by government. Thus, it begin a process of transitioning the internet's management outside of government, a process that culminated in what has come to be known as the IANA transition. The US government is to be complimented for its foresight and stewardship in helping to guide the global internet community through this period.

Impact of Unwinding the IANA Transition on Registry Operators

The IANA transition has been hugely beneficial to those of us who have a day-to-day responsibility for the operation of the DNS. As the manager of .CA, a top-level domain name, the timely, efficient and professional management of the DNS and the root server system is critical to the services that CIRA, and indeed all TLD registries, provide.

Prior to the IANA transition, every change to the root zone and the root zone database had to be individually approved by a NTIA staff member. These changes occur more often than might be imagined as they include not only delegations and transfers of TLDs, but also relatively frequent changes and updates to the DNS, for example, routine changes to nameservers.

As a registry services provider, I rely on many suppliers – internet transit for example – to provide us services. In order to provide reliable, predictable services to our own customers, we insist that our suppliers meet specific service level requirements. Prior to the IANA transition, this was not possible for what is our most important service: access and changes to the DNS. With the pre-IANA transition system of direct NTIA approval for these changes, specific Service Level Expectations, or SLEs, were not possible, which meant that there was a lack of specificity, predictability, and clarity in this process.

One of the important changes introduced in the context of the IANA transition was the establishment of a series of SLEs, a set of benchmarks for IANA services that provided much more certainty to the hundreds of registry operators on when they could expect changes to the root zone and the root zone database to be completed. This has contributed directly to the improved professionalism in the management of TLD registries thereby supporting the security, stability and reliability of the internet. The 'unwinding' of the IANA transition and the return to direct governmental approval would represent a regressive step in internet management and would create needless uncertainty in the industry.

Another of the important innovations that was introduced with the IANA transition is the establishment of the Customer Service Committee, whose job it is to monitor the monthly performance of the IANA functions operator, PTI, against these new SLEs. It also serves as the focal point for customer input to PTI on the management of the root zone. In addition to monitoring performance against these SLEs, it also works with PTI to review and develop changes to these. As the current chair of the CSC and as the operator of a TLD dependent on IANA for services, I have seen a material improvement in the quality and responsiveness of IANA to its

users. This can only help to enhance the stability, security and performance of the overall internet.

International Implications

Prior to the IANA transition, there was a general lack of understanding on how the DNS operates and in particular on the specific role played by the US government in it. One of the consequences of the IANA transition is a deeper and broader understanding by governments of how the DNS operates and the former role played by the U.S. government. They now appreciate that while the U.S. government did not 'control the internet', they now understand that the creation or transfer of a TLD required the direct approval of the NTIA. Unwinding the IANA transition and re-establishing the NTIA's role would provoke a negative reaction amongst governments, many of whom operate country code TLDs (ccTLDs). (While CIRA operates the .CA ccTLD, we are not a government agency, but rather a private member based corporation).

As the former Chair and current Vice-chair of the association of ccTLDs, the ccNSO, I know that such a move would create would create instability and uncertainty in the ccTLD community. Moreover, it would come at a time that many countries in the world are openly pushing for the UN's ITU to take over these IANA functions. The ITU has long coveted the management of the internet's critical resources and the instability that would result would play directly into their hands. This would come at a particularly inopportune time as the ITU's Plenipotentiary meeting, at which its constitution may be amended, will occur this November in Dubai. It will be important that the U.S. government to signal, before this meeting, that there will be no unwinding of the IANA transition. Without this, it would invite those states that wish to limit free expression to move resolutions effectively calling for a process to bring the internet's resources directly under UN control, an outcome antithetical to an open, innovative, generative, and creative internet.

Summary

Overall, 'unwinding' the IANA transition would be negative to the efficient, effective and secure management of the DNS. Moreover, such a move risks encouraging the ITU to seek control over the internet's critical resources, to the detriment of this important platform for innovation, communication and economic growth. The United States has long been a powerful champion of the internet, standing against the ITU's attempts at mission creep, and those nations who seek greater regulation, control and censorship of the internet. Reversing the IANA transition will create a vulnerability that would almost certainly change the internet as we know it today.

Now, as in the past, is the time for the U.S. to stand as a leader against those nations, and block the stifling of innovation sure to follow.

I wish to thank you for the opportunity to comment on this important question.

Byron Holland
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Canadian Internet Registration Authority