

## **NRO Response to ICANN Strategic Plan**

The Number Resource Organization (NRO), on behalf of the Regional Internet Registries (RIRs), welcomes the opportunity to comment on some of the issues raised by the draft strategic plan recently published by ICANN.

This comment of the draft strategic plan will focus on four main areas:

- Important aspects of the draft plan where the RIRs have not been consulted
- Inaccuracies in the plan that are directly relevant to IP number resources
- Budget and financing issues
- Inconsistent descriptions of the ICANN mission

To highlight the various elements that the NRO would like to see amended or clarified, the sections below will make detailed reference to statements from the draft strategic plan.

1) Important aspects of the draft plan where the RIRs have not been consulted

i) In the “Funding Sources” section, there is a subsection entitled “Regional Internet Registries (RIR) Contributions” that states:

“Voluntary contributions from RIRs are mutually agreed amounts that are negotiated annually. For fiscal year 2004-05, after discussions with RIR representatives, ICANN has budgeted RIR contributions at \$823,000, a 54% increase over the previous year’s contribution and equal to 10% of ICANN’s 200304 budgeted expenses.” (p.61)

We would like to emphasise that the RIRs have not agreed to this.

ii) In the section of the draft discussing ICANN’s future objectives (p.15), the matrix entitled “Figure 4: Identified Objectives from ICANN Stakeholders” indicates that there has been input from the Internet address communities regarding ICANN’s future objectives.

The RIRs have not been consulted on this. This is also the case for the statement regarding the strategic plan for ICANN’s future that notes:

“ICANN has determined its immediate objectives in a twelve month consultation with all of its constituencies, a process that appropriately reflects ICANN’s consensus-driven policy development process.” (p.16)

iii) In the section entitled “Develop and implement an appropriate plan for responding to the needs of registrants” the plan notes that ICANN will work to further improve its effectiveness in responding to user needs by:

“Improving Whois accuracy through ICANN’s Whois Data Problem Reports system.” (p.31)

There has been no co-ordination of this activity with the RIRs.

2) Inaccuracies in the plan that are directly relevant to IP number resources

i) In the “Provide robust core services to support the coordination of the global Internet systems of unique identifiers, and their stable and secure operation” subsection it is stated:

“The heart of ICANN’s technical mission is the IANA functions that were contracted to ICANN upon ICANN’s inception. These services include root zone management services, including updating ccTLD delegation information; IP address allocations to the Regional Internet Registries and reserved networks; and protocol parameter and port number assignments as defined by the IETF.” (p. 21)

The reference to "reserved networks" is unclear, and should be clarified.

ii) In a subsection entitled “Agreements with RIRs” the plan states:

“The IANA policies for allocation of IPv4 address blocks and other number resources to the RIRs are applied fairly and transparently, based purely on the documented need for address space.” (p.26)

It is important to note that this is also true for IPv6 address space.

iii) In the “Agreements with RIRs” subsection the plan also states:

“Formal bottom-up agreements policies and/or agreements are being prepared to define the strategies for distributing IPv6 blocks and other IANA-related functions.” (p.26)

This sentence is ambiguous, as it implies that currently no such policies exist currently. It should be noted that there has been a policy in place regarding IPv6 since 1999.

### 3) Budget and financing issues

i) The whole of the section entitled “6b Funding Sources” (pp.58 62) specifies a funding model that is based purely on the perceived capability of the various contributors to pay. It does not describe any service based reasoning for an organisation to provide funds to ICANN.

ii) There are a number of elements detailed in the plan that do not appear to be specifically listed in the budget:

- With regard to IANA functions: “Significant investment in technical resources and expertise will be needed to meet these priorities.” (p.22)

- “To appropriately fulfil ICANN’s service goals will require substantial investments in systems, infrastructure, regional presence and personnel. The following specific goals and objectives will need to be resourced.” (p.29)

- “While the Internet user communities initiate and guide the policy development process, ICANN sustains their efforts by providing the staff support and resources needed to coordinate their activities, which in turn maintains the valued participation of informed individuals and groups.” (p.34)

- Section 5a.ii) Recruit and retain the high-quality, multi-culturally diverse staff required to ensure this operation is globally efficient and effective (p.50)

- Section 5b.iv) Contingency plans to ensure continuity of operations (p.55)

In addition, the section that describes the comprehensive communications strategy (pp.42 45) contains several activities which should be protected by a special restricted fund.

### 4) Inconsistent descriptions of the ICANN mission

i) Section 2a (entitled “Fostering innovation, competition, agreement compliance and growth in the registration of Internet resources to benefit providers and users of registration services”) includes a number of references that cause confusion by unnecessarily mixing services related to domain names and services related to IP number resources. We strongly suggest that these two areas are kept distinct in order to maintain a clear focus on the ICANN mission as it pertains to either IP number resources or to domain names.

ii) Section 2a.i) of the plan is entitled “Responsive support to domain name and IP number registration providers and consumers”

The term ‘providers’ in this section should be made more specific as it is currently ambiguous.

With regard to IP number registration, this section does not explain this activity. We feel that this is not being done, nor should it be an ICANN task. There are significant differences between the management of IP number resource registration and the management of domain name registration.

iii) In the strategic priorities section the plan lists ICANN’s four strategic priorities and states:

“The four strategic priorities are those set down at ICANN’s foundation and embedded in its By-Laws, and have been the basis for all discussions since on ICANN’s functions and purpose:

1. Stability and security of the unique identifier systems
2. Competition and choice in the unique identifier systems
3. Independent, bottom-up policy consensus, and
4. Global representation in that policy process.” (p.17)

There is no mention here of the DNS or the root server system.

However, a few pages later, the following statement implies that maintaining routability is part of the ICANN mission:

“The global Internet community’s commitment to supporting the open architecture ideal and real-world diversity of network structure has been enabled by a commitment to maintaining a set of core protocols that are kept very stable. This core includes the Internet Protocol (IP), the routing system, and the domain name system. Through its management of the systems of unique Internet identifiers, ICANN has responsibility for maintaining the integrity of these core protocols.” (p.19)

This new definition of ICANN’s core services is also apparent in the following statement:

“ICANN has two objectives in maintaining a stable, secure DNS and appropriate management of the other sets of unique identifiers.” (p.21)

iv) There are a number of references (p.22) to ICANN operating the “L” root name server. It is difficult to see how the operation of a root name server contributes to the ICANN mission. In fact, an argument could be made that operating a root name server puts ICANN into a conflict of interest situation as being responsible for the security and stability of the root server system and at the same time being a root server operator. It also prompts the question: would ICANN’s concerns as a root server operator trump its overall management of the root server system?

A good example of the potential points of conflict that would arise from ICANN’s role as the operator of the “L” root server can be seen in the subsection entitled “Standardised relationships with Root server operators” (p. 27).

Finally, the legitimacy of ICANN operating the “L” root server needs to be questioned. Without providing any further detail, the plan simply states that:

“The community has entrusted ICANN with the responsibility of operating the “L” root name server.” (p.23)

v) We feel that the description of the activities and roles of the Stability and Security Advisory Committee (as described on p.25) needs more clarity and consistency.

vi) In the section entitled “Strategic Priority Two: Competition and Choice” the plan states:

“ICANN has also seen new technologies and protocols introduced for the registries and registrars to enable them to better service the growing number of registrants, who are better protected through transfer options and redemption grace periods.”

We feel that there needs to be more detail about ICANN’s role here, and whether it has expanded resources in this area.

## 5) Conclusion

We appreciate the opportunity to comment on some of the issues raised by this draft strategic plan. We welcome the fact that such a strategic plan represents further development and maturation of ICANN.

In closing, we would like to note that we encourage the drive for further internationalisation of ICANN, a point that is implied at various points in the draft strategic plan. This is a positive development and we would like to recommend that ICANN implement language programs to help this effort. We suggest that this would include simultaneous translation at ICANN meetings, as well as

translations of ICANN documents and pages on the ICANN website.

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