



Regional Internet Registries' Submission
to the
Committee on ICANN Evolution and Reform

20 June 2002

1. Introduction

The Regional Internet Registries (RIRs) jointly undertake the role of management of IP number resources through the allocation of IP number resources to network operators and Local Internet Registries. This managerial role is in support of the ultimate requirement within the Internet to associate network resources with numbers drawn from the relevant public Internet number space.

The three existing RIRs are set up as not-for-profit membership organizations with thousands of operators and other companies as members. They have undertaken this function for between five and ten years.

The RIRs are responsible for a critical component in the operational infrastructure of the Internet, and are mindful that in order to execute this role effectively they must operate within parameters of stability, predictability and efficiency of provided services, together with fairness, openness to participation and transparency in the related area of determination of RIR resource management policies.

The RIRs welcome this opportunity to comment on ICANN Evolution and Reform. It represents an opportunity to assess the relationship between the RIRs and ICANN in the light of a number of years of experience of working together, and, in so doing, propose a number of changes to this relationship which would enhance the functioning of both the RIRs and ICANN.

The RIRs have already noted, in a submission to ICANN dated 8 May 2002, the set of principles that should frame the interaction between ICANN and the RIRs. The RIRs note that these principles were not substantively addressed by the Committee on ICANN Reform and Evolution paper of 31 May 2002.

This submission does not address the entirety of issues noted in the ICANN Committee's report, as it specifically addresses only those matters which have a bearing on the RIRs' ability to undertake their role.

RIRs' Submission to the Committee on ICANN Evolution and Reform

The relationship between the RIRs and ICANN encompasses:

- the operation of the assignment of number resources from the Internet Assigned Number Authority to the RIRs,
- policy aspects concerning the adoption of common global policies, and
- governance of procedures relating to the recognition of additional RIRs.

Within the responsibilities of the Address Council of the Address Supporting Organization (ASO) there is the additional role of:

- nominating three individuals to serve as members of the Board of ICANN.

The RIRs note that the RIRs and the ASO are generally acknowledged to be functioning well. The RIRs operate as industry self-regulatory bodies, using open policy fora to develop operating policies that reflect the consensus positions of their constituencies. The RIRs operate responsibly and fairly in their application of management policies, and have well established review processes to ensure that these policies are applied consistently and fairly.

RIR Position:

The RIRs would like to construct upon this foundation of effective operating practice to assume greater levels of responsibility for operational roles that are currently shared between the RIRs and ICANN. This is intended to allow ICANN to function properly as an independent body with the power of review, such that ICANN can properly assume a responsibility for oversight of the RIR activities in terms of ensuring that the RIRs operate within their adopted policies and processes, without being compromised in its independence by also assuming a level of direct responsibility in the operation of the address management process.

2. The Operation of the IANA Address Registry

The working paper on ICANN Mission and Core Values notes that the mission of ICANN includes the coordination of the allocation and assignment of identifiers from the unicast IP v4 and IPv6 protocol address pool, and Autonomous System numbers.

The 31 May report of the Committee on ICANN Evolution and Reform noted that the Technical Advisory Committee (TAC) could be the body responsible for directly overseeing the technical operational activities of ICANN (largely but not exclusively the

work of the IANA). The RIRs understand that such a responsibility would encompass the operation of assignment of identifier blocks to the RIRs. This report also noted that "a careful evaluation should be made of which of ICANN operational tasks are appropriately allocated to ICANN and which could be subrogated or outsourced to other entities".

RIR Position:

The RIRs are not in favour of passing this operational responsibility to a TAC. Furthermore, as noted in the RIR Statement of Principles, the RIRs see no requirement or further benefit in having a two level address management process of initial allocations by ICANN to RIRs and subsequent allocations from RIRs to local registries and end users.

The RIRs have concluded that in the interests of enhanced stability and efficiency, the responsibility for this particular IANA operational function (maintaining the IANA Address Registry) should be passed to the RIRs.

The RIRs would see it as a desirable consequence to develop with ICANN adequate safeguards regarding longer term stewardship of the address resource.

3. Global RIR Policies

The Memorandum of Understanding relating to the establishment of the ASO assigned to this organization the responsibility for the development of global policies relating to the management of Internet addresses. The Memorandum notes that, in general, proposals for such policies would be developed within the RIRs and forwarded to the ASO for their consideration. The ASO then passes such proposals to the ICANN Board for further consideration and formal adoption.

RIR Position:

The RIRs are of the view that this duplication of the review function by both the ASO and ICANN is unnecessary, and adds overhead without benefit.

In the interests of simplifying the current process, and reducing the levels of duplication of function, the RIRs propose that the ASO undertakes the responsibility for formal adoption of global RIR policies, allowing for open review of such policies as part of its function of review and evaluation.

Furthermore, the RIRs propose that ICANN's role in this area is that of oversight of the ASO process, ensuring that the RIRs and

the ASO adhere to their stated procedures in the undertaking of this function. In this fashion ICANN provides the appropriate checks and balances in the RIRs' and the ASO's policy development process to ensure that the process is managed with the appropriate level of integrity.

4. Recognition of Additional RIRs

The Memorandum of Understanding relating to the establishment of the ASO assigned to ICANN the responsibility for the development of requirements and policies for the approval of additional RIRs, and enumerated a number of requirements that were agreed to form part of that policy. The RIRs note that they have unanimously supported and encouraged the establishment of LACNIC and AFRINIC.

RIR Position:

The RIRs propose that this responsibility be delegated to the ASO, and that ICANN adopt the role of oversight through review and reconsideration of ASO decisions in the event of a dispute. This proposal is intended to ensure that ICANN can operate with integrity as an independent and open body that can fairly review ASO's actions in application of the relevant adopted policies. The current process of placing both the decision-making responsibility and the responsibility for review within ICANN allows for a potential situation of unclear and possibly conflicted interest on the part of ICANN.

5. Nomination of ICANN Board Members

The Memorandum of Understanding relating to the establishment of the ASO assigned to the Address Council of the ASO the responsibility for the nomination of three Board members of ICANN. The 31 May Evolution and Reform report proposed that the chair of the Address Council, or a delegate be an ex-officio member of the Board of ICANN.

RIR Position:

In the scenario that the RIRs and the ASO assume a greater level of responsibility for operational and policy roles in managing Internet Address space, as proposed in this submission, the RIRs see little benefit in having the ASO seat more than one member of the ICANN Board, and is in agreement with the proposal that the chair of the Address Council be an ex-officio of the ICANN Board. It is noted that this agreement is conditional on a realignment of roles and responsibilities between ICANN, the ASO and the RIRs as proposed here.

6. General Comment

The RIRs have a direct and ongoing responsibility to undertake their role in management of Internet address resources. The RIRs have undertaken this role without any formal contract with IANA for many years, and, since 1999, on the basis of a Memorandum of Understanding. The RIRs would be willing to further formalize the relation with ICANN in the context of the proposals contained in this document.

The RIRs view with considerable concern the manner in which ICANN has assumed a critical role in the operation of certain aspects of the address management function, and at the same time, allowed itself to become deeply enmeshed in the complex issues of domain name management to the effective exclusion of all other roles. This assumption of responsibility without the wherewithal to undertake the associated role is not a desirable or stable position. The RIRs would propose that the relationship between the RIRs and ICANN be rephrased in a manner that aligns the onus of operational responsibility with the RIRs, and the onus of issues of adoption of global policy with the ASO, allowing ICANN to function as a venue for responsible review of those policies that are developed within the RIR process and that are common to all RIRs (global policies). As noted in the previous RIR statement on this subject, the RIRs see no value in an ICANN structure that admits the possibility of imposition of arbitrary and potentially capricious policies onto the management of Internet resources.

Given the discussion about ICANN reform the future of ICANN is by no means assured, and it is essential that we can ensure that the Internet and its associated infrastructure service roles should continue to function even if ICANN fails. Part of the intent of these proposals is to ensure that the Internet is not critically dependent on the continuation of one of the operational roles of ICANN, and that ICANN can operate as an efficient entity that can provide the appropriate levels of oversight and review to the RIR role without becoming a critical single point of failure for the entire network.

The Regional Internet Registries are:

Asia Pacific Network Information Centre (www.apnic.net) (APNIC)

The American Registry for Internet Numbers (www.arin.net) (ARIN)

Réseaux IP Européens Network Coordination Centre (www.ripe.net) (RIPE NCC)

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