



March 6, 2006, Reston, VA and Geneva, Switzerland

To: The Honorable John Kneuer (Assistant Secretary for Communications and Information, US Department of Commerce)

DOC Solicitation DOCNTIARFI0001, dated February 21, 2006.

This is a public comment on the above cited solicitation (RFI) [1] related to the Internet Assigned Numbers Authority (IANA). It is sent jointly by the Internet Architecture Board (IAB) and the Internet Engineering Task Force (IETF).

Clarification of technical parameter assignment function.

Specifically, the "technical parameters" portion of the IANA RFI [2] describes the management of parameters defined by IETF standards. As part of its standards specification process, each new parameter type definition includes a specification of the method of allocation of parameter values, as well as provision for appropriate technical review and acceptance. Where specific expertise will be required to evaluate any request, the IETF provides a "designated expert" to support the allocation function. These specifications are developed in the IETF's usual international, open, consensus-based e-mail discussion venues. Dispute resolution, when needed, occurs within the IETF organization.

There is a factual error in the RFI's description of the current technical parameter assignment function. It incorrectly associates "reservation and direct allocation of space for special purposes, such as multicast addressing, addresses for private networks, and globally specified applications" with the IP address management function. These allocations are in fact standards-based allocations developed and controlled by the IETF. IANA's function is to record these allocations.

We also point out a similar omission from the RFI's description of the technical parameter assignment function. It fails to list assignments of domain names for technical uses (such as domain names for inverse DNS or ENUM lookup) which are also standards-based allocations developed and controlled by the IETF, which IANA records.

Moving forward

In 1998, DoC signed an agreement with ICANN [3] to "coordinate" various activities, including "Coordination of the assignment of other Internet technical parameters as needed to maintain universal connectivity on the Internet;". This RFI appears to extend beyond "coordination" to "implementation", and we believe such an extension would impede the IETF from meeting its responsibilities in developing global consensus-based standards upon which the Internet depends.

Further information on our concerns and position on the IETF's technical protocol parameter assignment function is available on-line.[4].

We suggest the DoC separate the technical parameter assignment function (as corrected above) from the other two functions since that is carried out for and at the direction of the IETF. In 2005, the IETF established the IETF Administrative Support Activity (IASA) [5] housed within the Internet Society (ISOC), and this entity already has contractual relationships defined with two of the IETF's three administrative support organizations. The IASA is the home of all IETF-related operational agreements going forward – including the IETF technical parameter assignment function.

We appreciate the DoC's continuing support for the IETF's work and we look forward to establishing a close working relationship with the DoC in this matter.

Sincerely,

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Brian Carpenter, Chair, Internet Engineering Task Force
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References

[1]
<http://www.fbo.gov/spg/DOC/OS/OAM/Reference%2DNumber%2DDOCNTIARFI0001/SynopsisR.html>

[2]
"First, the Contractor would coordinate the assignment of technical protocol parameters. This function would involve the review and assignment of unique values to numerous parameters (e.g., operation codes, port numbers, object identifiers, protocol numbers) used in various Internet protocols. This function would also include dissemination of listings of assigned parameters through various means (including on-line publication) and the review of technical documents for consistency with assigned values."

[3]
<http://www.ntia.doc.gov/ntiahome/domainname/icann-memorandum.htm>

[4]
<http://www.iab.org/documents/correspondence/IANA-2006/IAB-IANA-Position.htm>

[5]
<http://www.ietf.org/rfc/rfc4071.txt>

Appendix A - Organizations

IAB. The Internet Architecture Board has a long history but is currently viewed as a senior committee in the IETF which has both technical (architectural) functions and oversight functions for the development of the Internet. The latter also includes oversight of IANA functions performed for the IETF. See <http://www.iab.org>

IETF. The Internet Engineering Task Force is a worldwide and open organization whose mission is to produce high quality, relevant technical and engineering documents that influence the way people design, use, and manage the Internet in such a way as to make the Internet work better. These documents include protocol standards, best current practices, and informational documents of various kinds. See <http://www.ietf.org>

IASA. The IETF Administrative Support Activity was created in 2005. It provides the administrative structure required to support the IETF standards process and to support the IETF's technical activities. The IETF expects the IASA to contract this work from others and to manage these contractual relationships to achieve efficiency, transparency, and cost effectiveness. IASA is housed within the Internet Society (ISOC).

ISOC. The Internet Society is a not-for-profit membership organization founded in 1992 to provide leadership in Internet related standards, education, and policy. With offices near Washington, DC, and in Geneva, Switzerland, it is dedicated to ensuring the open development, evolution and use of the Internet for the benefit of people throughout the world. ISOC is the organizational home of the IETF and other Internet-related bodies who together play a critical role in ensuring that the Internet develops in a stable and open manner. For over 13 years ISOC has run international network training programs for developing countries and these have played a vital role in setting up the Internet connections and networks in virtually every country connecting to the Internet during this time. See <http://www.isoc.org>