



Brussels  
28 February 2013

**SUBJECT: Consultation on ccTLD Delegation and Redelegation Performance Standards**

The CENTR Board of Directors appreciates the opportunity to comment on the consultation paper presented by ICANN on ccTLD Delegation and Redelegation Performance Standards and to contribute to the broader understanding of the issue.

CENTR members would like to underscore their commitment to further enhancing the stability, security and interoperability of the Internet Domain Name System (DNS) from a global perspective and for the benefit of the local and world Internet community. To that end, there may be benefits in certain circumstances for publishing key performance indicators and taking due care to avoid measurement inversion scenarios. We trust ICANN and IANA will find the following, informed opinion, useful.

*1. What are the key performance standards that would be meaningful for delivering the ccTLD Delegation and Redelegation service?*

CENTR believes that there are two scenarios that require a different approach. The distinction should be made between contested and non-contested delegations and redelegations.

Non-contested delegations or redelegations could be defined as those that do have the clear and univocal support of their local Internet community. Contested delegations or redelegations are those that fail to have such support.

We consider there is value in having fundamental metrics for non-contested delegations and redelegations and for basic IANA processes such as name server changes, changes to contact details, and replying to correspondence within “X” days of being instructed to make a change by a ccTLD Registry operator, as IANA already collects this data, although the publication of the summary of results should be made more visible.

Due to the complexity of end-to-end reassignment of a ccTLD delegation, and the potential for interference with the legal contracts and technical performance ccTLD’s Registrants enjoy with the current ccTLD Registry operator, we consider having end-to-end performance metrics for contested ccTLD reassignments are not appropriate. If ICANN/IANA’s opinion differs from this view, then ICANN /IANA must ensure that any redelegation does not undermine the operational stability of any existing domain name registration in a ccTLD. Should ICANN and IANA consider that a performance metric is necessary, they must ensure it to be both apparent and appropriate and provide financial compensation to the Registrants of the current ccTLD Registry (at the time of redelegation) as technical service may deteriorate following a redelegation.

*2. What do you consider KPIs for successful performance of the ccTLD Delegation and Redelegation service?*

As stated under “1.” We believe KPIs for contested delegations and redelegations are inappropriate.

Where ICANN does not have a legal relationship with all of the parties involved, the core role ICANN should perform is to facilitate the dialogue between the (conflicting) parties. ICANN is neither informed nor mandated to make decisions that interfere in national and/or international matters that may have an impact on global electronic commerce, the life of Internet citizens and compliance with the Rule of Law. Consequently, IANA, as referenced in RFC-1591, should encourage the parties to either find a direct agreement or invite them to seek judicial review. It will then become incumbent on either the successful or losing party to instruct ICANN and IANA as to the outcome of the legal process and to act in accordance with the decision.

For non-contested delegations and redelegations KPIs are commonly used by an organization to evaluate its success or the success of a particular activity in which it is engaged. ICANN and IANA are in a unique position in that they act as a global secretariat for a number of key functions. Measuring KPI in periods of time should not be the only unit of measurement. Instead, KPI metrics could be “for maintaining the stability and consumer confidence in a given ccTLD”, which frequently may have a bearing on hundreds of thousands of existing Internet users, as consumer confidence in the DNS is a measure of ICANN and IANA’ ability to achieve its core objective. For instance, success could be measured by the total amount of complaints received from registrants by all parties involved.

We appreciate ICANN’s wish to serve ccTLDs as stewards of the DNS for both the local and international DNS sector, while safeguarding the broader public interest. To that end we assume that ICANN and IANA will avoid challenging the legal framework under which all Registries perform their service and deliver a quality of service to their registrants.

We share ICANN’s view that the stability and user confidence in the way a ccTLD domain Registry operates is of paramount importance. Therefore, it may be appropriate where the reassignment of a delegation is not contested that IANA acts promptly to facilitate the instructions of the incumbent manager to ensure a smooth transition. In such instances the proposed time line of 60 days might be shortened.

Having a performance metric to demonstrate that ICANN has fulfilled its mediation role, to result ccTLD reassignments being non-contentious, would be appropriate.

When targets are set for the non-contested delegations and redelegations, we believe that a target of 80% is unhelpful. Any service level that is set below 95% is bound to fail in increasing customer satisfaction.

*3. In what formats would you like the results reported to the community?*

Performance results should be published on the IANA website on a monthly basis. These KPIs should also be presented at ccNSO and Regional Organisation meetings in order to encourage a continuing open debate on their relevance in measuring the service levels provided by IANA.

4. *Do you have additional input on suitable performance standards for the ccTLD Delegation and Redelegation service?*

Due to the complexity of a reassignment of a ccTLD delegation, it is assumed that there will be procedures to inform all directly involved parties when ICANN or IANA becomes aware of a credible threat to an existing Registry's operation. However, there is no need for an ICANN or IANA public announcement that may undermine a given ccTLD operation. Non-contested delegations should be published on the IANA website. The publication of a (potentially) contentious dispute between credible parties and the championing of specific positions is a matter for the involved parties only.

We also suggest that IANA keeps track of any incidents related to the delegation or redelegation of ccTLDs or more in general, any root-related incidents in which ccTLDs are involved. Incident reports, management and statistics over time will show if there are specific areas where improvements are needed and what measures are taken to make sure that an incident doesn't occur again.

On behalf of the CENTR Board of Directors  
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**About CENTR**

CENTR is the world's largest association of Internet domain name registries. CENTR has over 50 members which account for over 85% of the country code domain name registrations world wide. Each CENTR Full Member operates a country code top level domain such as .uk, .es or .be. In this capacity they play a pivotal role in the stability of the Domain Name System and the Internet.