Asia Pacific Top Level Domain Association

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About APTLD

APTLD (Asia Pacific Top Level Domain Association) represents the interests of country code Top Level Domain (ccTLD) registries in the Asia Pacific region. APTLD was originally established in 1998 was legally incorporated in Malaysia in 2003.

APTLD is a forum for information exchange on technological and operational issues between domain name registries in the Asia Pacific region. It also acts as an interface with other international Internet coordinating bodies, fostering the participation of AP ccTLDs in these global fora and acting in the best interest of APTLD members in global Internet policy-making processes.

Further information about APTLD can be found here: http://aptld.org.

Introduction

APTLD welcomes the opportunity to respond to the Consultation on ccTLD Delegation and Redelegation Performance Standards by ICANN. APTLD has consulted members' view on the issues via its mailing list and a questionnaire. This paper contains the consolidated comments of our members.

APTLD's responses to the specific questions of the Consultation

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

In addition to "Timeliness" and "Accuracy" as proposed by ICANN, it is our view that "Communications and Transparency" should also be included as key performance standards for delivering ccTLD Delegation and Redelegation service.

It is important for IANA to publish a comprehensive list of required documents and questions it intends to ask a requester upfront on its website. This allows requesters to prepare the answers and submit the responses together in their initial submission. In seeking approval to implement IDN services under the fast track IDN ccTLD process, some requesters have experienced the need to answer many more questions from IANA after having submitted the delegation request with the duly completed ICANN-prescribed template. A request for delegation or re-delegation can be more expeditiously processed if IANA's questions are stated upfront.

It is also important for IANA to include time frame for acknowledging and replying to ccTLD Delegation and Redelegation progress enquiries by requesters and affected parties as key performance standards. By including the said time frames as KPIs and publishing the IANA's respective targets, ccTLD Delegation or Redelegation requesters and affected parties could rest assured that there would be responses from IANA regarding their queries at a certain time and could hence plan ahead for the subsequent processes. These KPIs could also serve as checkpoints along the service processing time and help IANA meeting its targets for processing the ccTLD Delegation or Redelegation requests.

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

The proposed KPIs of for ICANN to complete Delegation and Redelegation requests within 60 business days for 80% of the requests, in most of the normal circumstances, seem somewhat conservative. We can appreciate that in case of a hostile Redelegation request, where the ccTLD existing operator is operating a secure and stable service that is compliant with RFC1591 and the

GAC Principles, there should be a longer period allowed for considering the broader issues. However, in case of a Delegation or non-hostile Redelegation request, the 60 business-day end-to-end processing time in our view is too long, we suggest 30 business –day should be efficient.

Moreover, the prescribed metric for accurately processing the requests in a month should be as close to 100%, and if not practical, in the range of 90s%. IANA should need to clarify the rationale for setting itself a conservative target of 80% accuracy.

It is also possible that a requester may have to respond to IANA subsequent questions after an initial submission. In that case, a KPI should be set to prescribe the duration (e.g. 5 business days) by which IANA will respond to the requester upon receiving a complete submission from the latter. This will offer much certainty to a requester.

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

In principle, we think that the final results of the ccTLD Delegation or Redelegation requests shall be reported to the community via emails and ICANN and IANA's websites in a timely manner. However, we consider it is of utter importance to secure the communications of the detailed and the confidential part of ccTLD Delegation or Redelegation request reports to requesters and affected stakeholders, and keep such detailed reports restricted to requesters and affected parties.

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

APTLD would recommend IANA to maintain a complete set of FAQs on its website so that requesters and affected parties could prepare the necessary documentations required by IANA timely for ccTLD Delegation and Redelegation.

We also think it would be appropriate for IANA to inform the existing ccTLD operator immediately when a Redelegation request is received.

In relations to the request for change of contact information, we consider the 7-day time frame to be too long, therefore we suggest a 3-day time frame . We would like to be kept informed on the communications between IANA and the US Department of Commerce regarding such requests.

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