Report of Public Comments

Title:	Consultation on the Source of Policies & User Instructions for Internet Number Resource Requests
Publication Date:	30 August 2013
Prepared By:	Leo Vegoda

Comment Period:		**Important Information Links**
Comment Open Date:	25 June 2013	**Announcement**
Comment Close Date:	16 July 2013	**Public Comment Box**
Reply Close Date:	7 August 2013	**View Comments Submitted**
Time (UTC):	Midnight	Report of Public Comments

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Section I: General Overview and Next Steps

The comments received will help ICANN refine and improve the user instructions it provides. ICANN staff is working on improvements and will publish them soon.

Section II: Contributors

At the time this report was prepared, a total of 3 (three) community submissions had been posted to the Forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
German Valdez	NRO	GV
Russ Housley	IAB	RH
Lutz Donnerhacke	ALAC	LD

Individuals:

Name	Affiliation (if provided)	Initials
Mark Janssen		MJ

Section III: Summary of Comments

General Disclaimer: This section is intended to broadly and comprehensively summarize the comments submitted to this Forum, but not to address every specific position stated by each contributor. Staff recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

Proposal for a protocol
MJ proposed an idea for a new naming, numbering and routing protocol.

Scope of the user instructions

RH noted that the scope of the draft user instructions was broadly drawn and encompassed protocol parameter assignments governed by a separate policy regime and set of processes. He suggested modifying the title to better reflect the scope of the instructions or modifying the scope of the instructions to better reflect the title.

User instruction details

GV provided input on a number of details, including specific e-mail addresses to be used when submitting requests and the terminology used. He also asked for a sample request template and details of the specific format of the notification message to provide when declaring the [Recovered IPv4 pool active](#).

GV found the language covering the number of AS Number blocks an RIR requests unclear and asked for clarification over what is defined as fragmentation. He also asked for some clarifications on the process for registrant name changes.

Service Level Agreements

GV asked for a Service Level Agreement to be incorporated into the user instructions document.

Publication formats

GV requested that the instructions be published in HTML and as a PDF.

End-user issues

LD noted that ICANN's IANA website does not provide instructions for end-users who want to interact with organizations such as Local Internet Registries (LIRs), domain registrars or resellers and proposed that not only should the site provide instructions for the organizations that interact with ICANN as the provider of the IANA Functions but also abstracts of the downstream registration process.

LD went on to state that ALAC finds the protocol parameters registries confusing and requested that they become less so. However, no specific recommendation was provided. He further requested end-user instructions for changing RIRs and for changing the registrar of a domain name.

LD then noted that ICANN IANA web pages should be easily accessible for people with disabilities.

Section IV: Analysis of Comments

> *General Disclaimer: This section is intended to provide an analysis and evaluation of the comments received along with explanations regarding the basis for any recommendations provided within the analysis.*

Proposal for a protocol

ICANN is not a standards development organization (SDO) and suggests that MJ take his proposal to [the IETF](#), which is the SDO responsible for developing Internet protocols.

Scope of the user instructions
ICANN agrees with RH that the scope of the title does not match the scope of the draft user instructions and plans to revise the title in line with his suggestion as user instructions for protocol parameter assignments are already documented elsewhere.

User instruction details
ICANN will clarify the details noted by GV. ICANN will meet with NRO staff to make sure that the published user instructions document meets their needs.

Service Level Agreements
Performance standards were the subject of a separate consultation and ICANN will be publishing the performance standards it commits to work to alongside performance reports later in the year.

Publication formats
ICANN is happy to publish the user instructions both as HTML pages and a downloadable PDF document.

End-user issues
While it is true that ICANN's IANA web pages do not provide instructions on how to interact with LIRs or domain name registrars, ICANN does provide an overview of the addressing system and links to the Regional Internet Registries. ICANN does not attempt to document the policies and procedures in place in each of the five RIR regions as the RIRs already do this themselves.

The issue of protocol parameter registry design falls outside the scope of this consultation. However, it is worth noting that ICANN has worked very closely with the IETF Protocol Registry Oversight Committee to make sure the protocol parameter registries meet the needs of the main user groups.

Publishing instructions for changing domain name registrar on the IANA pages is not appropriate as domain name registrar policies and processes are not IANA functions. The policy and process are both well documented on ICANN web pages. Publishing end-user instructions for changing RIR would not be appropriate. In almost all cases, end-users' Internet connections are assigned IP addresses by their ISP and those addresses cannot be moved from ISP to ISP. Where an end-user has Provider Independent address space, the ability to move the registration from one RIR to another is governed by RIR policy, which may vary from RIR to RIR. RIR policies and procedures are documented on the RIRs' websites and summarized on the NRO site.

Finally, we are aware of the need to make IANA web pages accessible, and have been careful to deploy clean standards-compliant HTML. Any additional functionality, such as that relying on JavaScript, has been designed to gracefully degrade. We are mindful of not just the ability of those with disabilities to access our website, but those who use alternative technologies. Any specific difficulties with certain pages that are reported will be reviewed and remedied as needed in a timely manner.