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## ICANN Response to the Call for Evidence for an Evaluation or Fitness Check on Regulation 1025/2012 and EU's Standardization Policy

### Introduction

The Internet Corporation for Assigned Names and Numbers (ICANN) is a nonprofit public benefit corporation that, on behalf of the Internet community, oversees the technical coordination of the top-most level of the Internet's Domain Name System (DNS). To reach another person on the Internet, you need to type an address – a name or a number – into your computer or other device. That address must be unique so computers know where to find each other. ICANN helps to coordinate and support these unique identifiers across the world. ICANN's mission is to help ensure a stable, secure, and unified global Internet.

ICANN works closely with other technical partners in the Internet ecosystem to achieve its mission. This includes working with standards organizations to ensure the smooth operation and evolution of Internet standards and protocols.

This comment on the call for evidence is submitted by the ICANN organization in accordance with its [charter](#) for engagement with governments and standards bodies, and in order to highlight the importance of a collaborative international approach to Internet standards' development. ICANN does not hold a stance on the political objectives of the European Union on standardization. Furthermore, it also acknowledges that Internet standards are not a primary focal point within the European Commission's "EU Strategy on Standardisation".

Nevertheless, ICANN emphasizes that there are limitations to what can be achieved at the regional or local level outside of international standardization processes, and warns that bypassing these processes when it comes to Internet standards could have serious consequences to the global nature of the Internet.

ICANN welcomes greater participation of all stakeholders, including governments, in Internet standard-setting bodies. ICANN also underscores the risks and challenges associated with shifting standard-setting discussions from dedicated standard-setting bodies to the political arena.

### The Internet Relies on Universal Interoperability

When we open an app on our phones, or navigate to a website in our web browsers, there are a lot of things that happen behind the scenes that we don't see. There's an entire global infrastructure of devices and software which exist to transmit and process all the data to and from our devices. Wi-Fi, Fiber optics cables, routers, switches, firewalls, and core Internet systems like the DNS all work together seamlessly so that when we ask our devices for data, that data is retrieved and sent to us at the speed of light.

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We commonly use the term “interoperability” to describe that seamless interaction. Interoperability is the primary reason the Internet went from a small scientific experiment in the 1960s to the biggest and most impactful invention in modern history. The Internet is globally interoperable because all the network operators around the world chose to adopt and use common standards.

The adoption of standards by a network operator is, indeed, a matter of choice. No one is compelling others to select one standard over another. However, that choice is often determined by the extent to which interoperability is valued or desired. If someone is building an application that needs to be reachable anywhere in the world, they have to adopt the standards everyone else uses. Otherwise users may not be able to access this application, and the application may fail to connect to other sites necessary to fulfill its function.

Internet standards are developed through a collaborative and iterative process involving multiple organizations, technical experts, and stakeholders. There are multiple standards development organizations (“SDOs”) in the Internet space. The most important Internet SDO is the Internet Engineering Task Force (the “IETF”).

The IETF’s output of standards development dates to April 1969. The IETF’s standards development evolved from that year, when there were only four people working on Internet standards. Today the IETF is open to participants around the world, with tens of thousands of individuals taking part. These participants act as individuals, and do not represent companies or governments. The work of the IETF is primarily conducted through email lists that are accessible to everyone, allowing anyone to contribute without the need for membership or dues.

The IETF standards are the product of exchanges among all participants, where a rough consensus is required. Subsequently, as real-world implementation and experience unfold, better solutions eventually become more evident. As a result, existing standards may undergo revision, or new and more effective standards could replace them.

### **The Risk of Losing Interoperability**

When it comes to the Internet, interoperability is the essential feature that allows it to be global. Without common Internet standards and protocols, devices on different networks would not be able to communicate with one another, resulting in the creation of “walled gardens” across regions and continents.

The Internet of today is global because everyone in the world adopts the standards that come out of the IETF. They choose to adopt these standards because of the high level of trust that exists in the process that develops them - a process that produces standards via a collaborative, international effort, with the participation of experts from around the world. The process is engineering-based and not politically driven, with the primary focus always centering on engineering and interoperability, which is key to achieving optimal solutions.

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## Conclusion

ICANN stresses the importance of advancing Internet standards within the IETF framework. In addition, it values the increased participation of expert policymakers in these development efforts and their contributions to the dialogues. Concurrently, it emphasizes the significance of preserving the essence of the current decision-making process, as mentioned previously.

It is important for policymakers to be involved in standardization processes, lending their expertise to engineers so that real world challenges are considered while new technologies are being developed. At the same time, it is also important for policymakers to respect the benefits of engineers driving the standards development processes, and why they have resulted in a successful, global internet.

ICANN welcomes the opportunity to participate in the call for evidence and remains available for further discussion.