Report of Public Comments

Title:	Consultation on Internet Number Resources Performance Standards
Publication Date:	22 April 2013
Prepared By:	Leo Vegoda

Comment Period:		Important Information Links
Open Date:	20 Nov 2012	**Announcement**
Close Date:	7 Jan extended to 28 Feb 2013	**Public Comment Box**
Time (UTC):	23:59	**View Comments Submitted**

Staff Contact:	Leo Vegoda	**Email:**	leo.vegoda@icann.org

Section I: General Overview and Next Steps

ICANN will develop a plan for implementing the KPI targets it has proposed and most of the improvements proposed in response to the consultation. In some cases the development of specific targets will require additional consultation with stakeholders and ICANN plans to engage with stakeholders to discuss and agree on the fine details.

Section II: Contributors

At the time this report was prepared, a total of three (3) 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
Paul Wilson	NRO	PW

Individuals:

Name	Affiliation (if provided)	Initials
Avri Doria	None	AD
Peter Thimmesch	Depository, Inc.	PT

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).

Past performance –vs– developing performance standards
One comment referred to the consultation as a report and suggested that it documented an

evaluation of previous performance. It asked questions about how the proposed KPIs were selected and who had performed the measurements but did not suggest any specific measurements or performance standards to work towards in the future.

Recommendations for KPI target improvements
One comment recommended several improvements to KPI targets. These included improving the clarity of the language for the IPv4 allocation KPI; making allocation announcements on the same day as the registry is updated; and setting a less restrictive target for the number of messages exchanged with requesters.

Recommendations for additional KPIs
A number of suggestions for additional KPIs and performance measures were suggested. They covered both the initial stages of policy implementation and ongoing operations. They were:

- Publishing implementation schedules after global policies are ratified, along with clear communication of progress towards implementation;
- An agreed timeline for updating systems and registries when an IPv4 /8 moves from one RIR's management to another;
- Reporting response times for allocation requests;
- Reporting the number of requests received, approved and denied, along with reasons; and
- Reporting the number of registry update requests and processing times;

Reports related to operational services
One response recommended publishing a number of reports related to DNS operations and routing policy registration.

Publication format for reports
There was also a recommendation that performance results should be published in a machine readable format as well as human readable formats.

Introducing a measure of registration accuracy
One response suggested publishing a measure of registration accuracy for the IANA IPv4 Address Space registry.

Process, policy and context publication requests
A recommendation was made to publish all community processes and procedures, and to publish explanation of why some IANA Functions are not included in the NTIA contract.

Structural changes
One response recommended making changes to the registration policies and environment for IPv4 address distribution. These included the introduction of a registry/registrar model for IPv4 address space transfers and the development of a competitive market in IPv4 address space registrars.

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.*

Recommendations for KPI target improvements
ICANN accepts the recommendation to improve the clarity of the language for the IPv4 allocation KPI and also accepts the proposal to change the target for public announcement of allocations to the same day as the registry is updated. ICANN is happy to review the target for the number of messages exchanged with requesters for additional resources and plans to discuss the target with the organizations qualified to receive allocations.

Recommendations for additional KPIs
ICANN accepts the proposal to publish implementation schedules for new global policies and to regularly communicate implementation progress. ICANN also agrees that a timeline for updating systems and registries when an IPv4 /8 moves from one RIR's management to another should be agreed and plans to discuss this with the RIRs.

ICANN also accepts the recommendation to report on resource requests. ICANN has reported the majority of the information requested in graphical format on the https://charts.icann.org site for several years as well as in the authoritative IANA registries for each resource type. ICANN also publishes a daily graphical analysis of each RIR's resource holdings on its http://stats.research.icann.org site, based on the information the RIRs publish on their FTP sites. The site shows an analysis for each RIR, based on the criteria defined in the Global Policy.
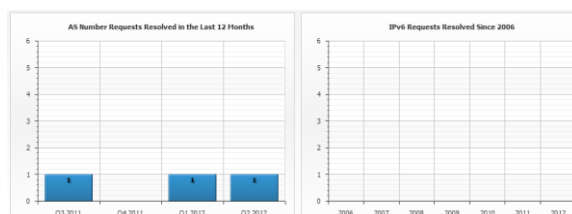

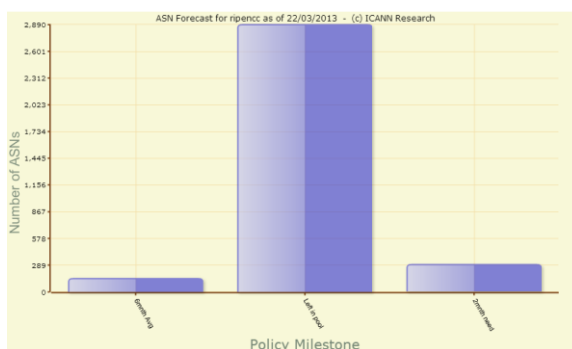*Fig. 1 Reports on INR allocations made at charts.icann.org*

Fig. 2 Analysis of RIR ASN holdings against policy, criterion 2, at stats.research.icann.org

ICANN plans to discuss the proposal to disclose details of requests that have not been approved along with reasoning with NTIA and the RIRs, to identify any confidentiality issues.

Introducing a measure of registration accuracy

ICANN recognizes that issues associated with the accuracy of registration data for domain names have been an active policy discussion topic for over a decade. As such, ICANN feels that it would not be appropriate to short-circuit a policy discussion in the Internet Number Resources space by publishing assessment prior to a general agreement on what constitutes accuracy or inaccuracy. Nonetheless, ICANN recognizes the importance of maintaining registration data and proposes to make a web form available for reporting where registrations need to be updated.

Publication format for reports

ICANN accepts the recommendation that reports about request processing are published in machine and human readable formats.

Reports related to operational services

ICANN is not involved in the publication of routing policy. A list of over 30 independently operated routing registries is published by Merit Network, Inc. at: http://www.irr.net/docs/list.html

ICANN has published performance information relating to authoritative DNS operations for which ICANN is responsible on the http://dns.icann.org site for a number of years.
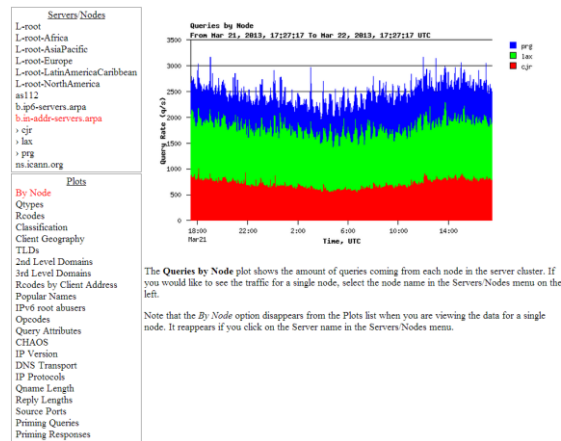

Fig. 3 Reports on IN-ADDR.ARPA service at dns.icann.org

A number of other DNS measurement reports are provided by independently operated organisations.
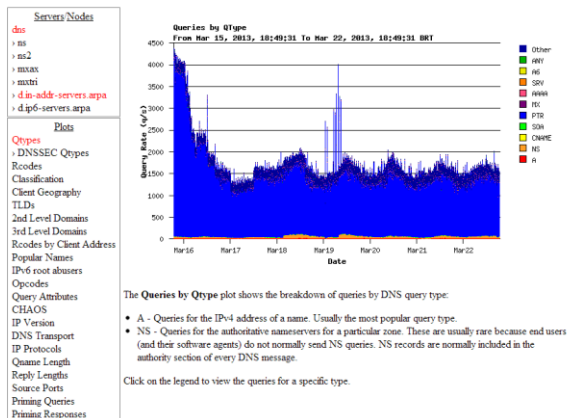
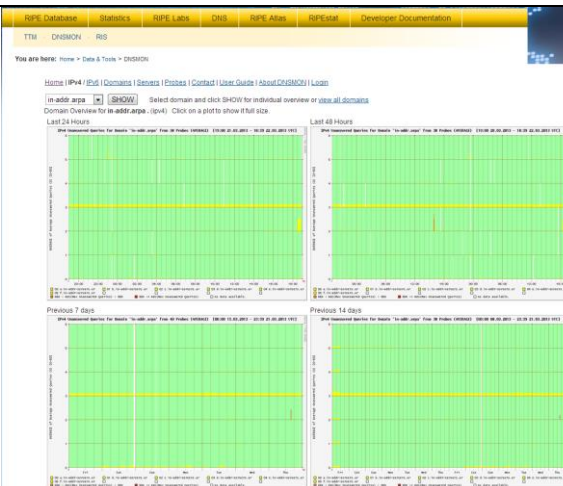*Fig. 4 Reports on IN-ADDR.ARPA service at dsc2.lacnic.net*

Fig. 5 RIPE NCC DNSMON reports on IN-ADDR.ARPA

Process, policy and context publication requests

The recommendation for all process and procedure documents to be published will be addressed via a separate consultation. The recommendation for an explanation of why some IANA Functions are not included in the NTIA contract is outside the scope of this consultation.

Structural changes

The recommendations relating to the development of a competitive market in IPv4 address space registrar services and the development of a registry/registrar model fall outside the scope of this consultation.