

Review of the projected IANA/ICANN MoU extension 2006/06/30

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Review of the current Draft

- Introduction

The alluded Memorandum is the RFC 2860. This should be mentioned.
It should be mentioned that this supplemental agreement will be an RFC.
I suggest both documents to be made into a BCP so they can be updated.

This supplemental agreement only concerns registry content management.
QoS of access to the registries and other ancillary services are missing (cf. part2)

- Services

1.

missing:

- "e. ietf mailing list associated with the registry"
- "f. external mailing list associated with the registry by IESG decision and reference"
- "g. iana mailing list associated with the registry by IESG decision"
- "h. external mailing list associated with the registry by IANA decision"

This covers the uncertain status of the mailing lists listed in https://datatracker.ietf.org/public/nwg_list.cgi that are related to a registry.

Registry Matrix:

The registries considered in the documents are updated lists rather than registries (where nothing is modified, but where changes are dated additions). In the Registry Matrix, it seems necessary to at least retain the date of the last validity check of the information.

IETF-IANA committee.

This committee is alluded to here, just the same as in other places. It is not introduced. Its organisation, membership, authority, appeal procedures, etc. are not described. This calls for a description of the IETF itself (legal representation) and of the title of ICANN to sign on behalf of the IANA, after a description of what the IANA is.

2.

"individual request". This term is undefined. Does that mean "one request" or request by an "individual"?
There is no indication of the procedure and format of such requests.

The further wording "IESG/requester" seems to indicate that requests can proceed from IESG or from any

requester, without any filtering. Further wording in the document seems to indicate a dual request track: via the IESG (IETF) and direct individual requests.

The difference between Public and IESG/requester views is extremely worrying if not justified, documented, and limited. The worry regards the democratic transparency and audit, but also due to the possible circumventions which in turn may create difficult situations.

3.

What is a single point of expertise for an IANA process? The task of managing the IANA consists in offering suitable forms to enter additions and/or updates and following an authorisation track leading to marking the request as accepted (under various possible conditions) or rejected. I feel that the real single point of failure that the IANA could experience is the very notion of point of expertise. Everyone should be able to conduct the IANA process machinery from A to Z?

4.

The target is not possible since the queuing process does not only depend on ICANN/IANA. There should be a notion of an IANA track and of an external track, in which the IANA would only be accountable for the IANA track and of its management of the external track. This notion is partly introduced further on with the "gross processing time" and "net processing time" - IANA/ICANN mismanagement may cost a very short net processing time and wrong long gross processing delays.

5.

This seems bizarre that the audit of the IANA would be performed by the sole IANA. This will not permit the IETF to check if the inventory is correct. It would seem more appropriate to place the responsibility of the inventory on the IETF-IANA committee?

6.

ICANN/IANA should not be made accountable for the entire issue. It should also be indicated that ICANN/IANA could document bottlenecks and the concerned authorities. At some stage the request can be denied (this is documented further on). This should be mentioned as a possibility. It should also be told that IANA/ICANN indicates who has authority/or when this abandon results from procedural rules/delays.

- Service Levels

The principle of joint responsibility for cooperatively managing the resource request process is established.

- I am not certain that I understand what a "resource request" could be exactly.
- the ICANN/IANA seems to have no restriction in receiving requests, reviewing them, forwarding them to the Experts, etc. What then if this is not the procedure documented by an existing RFC?
- the IETF community is said to have direct or indirect control over third parties. IESG designated experts, IESF, IAB, RFC Editor seem okay. However, what is the direct or indirect control the IETF community on requesters? How is it organised? Is it true for all the Registries?

7.

7.1. The mission, status, and powers of the Experts are not defined. Are they IETF Experts or IANA Experts that are selected by the IETF? This is important in the case of conflict with an Expert's position. The only legitimacy I can find regarding the Designated Expert's authority is in RFC 3935. The mission assigned by that RFC to the IETF ("to influence the ways people design, use, and manage" the Internet to best support the IETF core values) is contested. I think it would be more appropriate to describe their authority and its limits in this MoU.

7.2. IESG should not be able to designate an Expert without his IANA mailing list that has to be established first when this is decided by the corresponding RFC. The ICANN/IANA should then publish this mailing list on its website, guaranteeing its neutrality and openness to all. The moderation terms, appeal procedures, etc. should be published before the designation of the Expert(s) so that this(these) Expert(s) publicly accept them.

8.

there should be a procedure to appeal against the ICANN/IANA when a delay is not technical. This should be obviously subject to a possible call to the ICANN Ombudsman.

9.

it should probably be indicated that the time excess is consecutive. Therefore, the addition of various delays does not trigger an escalation at the end of a complex process.

- escalation

12.

the timeframe indicated may not match the timeframe of existing RFCs. What is the rule in such cases?

13.

as a general remark, this scheme and the entire document does not consider the Internet standard process appeals. It also does not supply a procedure to follow in the case of a conflict of expertise. It does not consider the Internet standard process delays of appeal and the resulting date of validity, or the way data are restored after an appeal. To my understanding, updates under BCPs are immediately effective even if contested later on; under RFCs they are effective 2 months later on.

14.

a.

typo. Should read "thirty (30)"

b.

the difference between thirty days and one month and the way the two delays apply is not clear.

The Requester is able to oppose the Experts' position through the Internet standard process. He/she can also call on the help of the ICANN/IANA Ombudsman. He/she can also appeal, on some occasions, to ISOC.

It is noteworthy that the increasing interest of the GAC to become involved in matters affecting national Internet usage. Registries fall definitely in that area. A liaison with, and a mention of GAC would certainly prevent conflicts ahead.

15.

I suggest that ICANN/IANA commits itself to present an external escalation path. It can only document after having respected ICANN procedures, which will take longer than 2 months.

16.

Such a secrecy clause has no room in a public agreement of that sort (or very precisely documented and limited). It would be appealed, leading to delays.

- documentation

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b.

requests are here also submitted directly - what I support. However, the word "appropriate" suggests procedure, formats, etc. If the target is to speed up the whole IANA process, these issues are at the core of the project. The wording should be more precise to protect both parties.

f.

is that list a part of the Registry Matrix or not?

g.

this transfers information management to IANA about every IETF issue? . The IANA/ICANN MoU explicitly removes names and numbers issues from the IETF responsibility and leaves it to ICANN. This paragraph can be used to claim that the proposed MoU extension covers every IANA registry, so the targets also concern the TLD and IPv4/6 related registries. Is that the case?

- Reports

The reports discussed concern the IANA Registry Manager task, not the entire IANA Management. There are no statistics on the registry access up-time, response time, traffic, number of access, cpu work load, etc.

There is no indication of whether the considered time is the net or the gross processing time.

There is no possible way to quantify the IANA Management performance (decrease of the external processing time?).

- collaboration

- there is no mention of a further joint commitment to study or to conform to ISO 11179.

26.

A draft is quoted in a document. This seems to be inappropriate?.

Only IETF geeks know that RFC 2434 is about "Guidelines for Writing an IANA Considerations Section in RFCs".

I think there should be an ISO 11179 interoperable classification of the request status that should be produced by an ad-hoc WG. Its mention as a target would assist in such work.

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Only IETF geeks know that RFC 3535 is about a past IESG workshop and which part of that RFC is alluded to.

- signature

I do not feel the IANA is part of ICANN. It is an USG function contracted for a given period to ICANN. I think more appropriate an ICANN, IANA, IETF, IASA, and IAB signature as all of these parties are concerned.

- Appendix A

This table may contradict RFC established procedures and appeal delays. It should be mentioned that it is a net processing time.

- Appendix B

Expert review:

The related mailing list by ICANN/IANA or IESG, the moderation of this mailing list, the appeals against Experts and mailing list moderators are not included in the document flow.

The involvement of the Author, WG, and AD are out of context. IANA is a registry that MUST respect the published procedures (RFCs) that developers also independently respect. The role of the Expert is to consider the thorny points. In addition, usually WGs will be closed. This flow chart would create an arbitrary Internet and lead to endless conflicts. If there is serious difficulty, a regular RFC should be published to address it.

What I think is missing

This document does not discuss the IANA mission and context, IETF, ICANN, etc.. The first question I had when reading the document was: "who is talking to who about what?".

This MoU should commence with the usual recital, documenting the entity and special terms being referred to or used.

Today the IANA is active in at least two directions (content management and information repository services) in four main areas: names, numbers, protocols, and languages. It seems that this MoU is about content management only. However, it does not elucidate if the "content" is managed or if only the "management" is to be also managed by the MoU. There is not a single word regarding the way in which the IANA registries will be presented online: format, type, and freedom of access, cost of access, stability and quality of access, replication tools, IP rights on what.

The document MUST specify what the IANA deliverable is and what its terms of usage are.

There is not a single word regarding interoperability with other registries and ISO Registry standards.

There is not a single word regarding USG, GAC, and user quality control solutions. The USG is committed by way of the Tunis agreement. The GAC is increasingly concerned. User grassroots alternatives have commenced developing.

More worrying, there is not a single word regarding multilingualisation.

The threads on the IANA in the current context

Tunis has de facto adopted a new vision of the way to use the world e-ecosystem.

- there is an Internationalized US Internet, with the IANA, supported by the IETF, allied with the US Industry and supervised by the USG.
- there is also an open debate regarding the Internet evolution to match the users' needs, which one of the top four priorities is that multilingualisation the IETF only want to address through its limited internationalization options. Other users' priorities are technology evolution and digital convergence.

For the time being, the IESG has not said if it has accepted that situation. The purpose of my pending appeals is to get this clarified..

The IANA is the core of the debate. It can be considered as a real or virtual server.

- If the IANA wants to have its own machines (as is still the case for root servers) people wanting to take over IANA control have now the practical capacity – using the language registries - to strangle it through an applicative DoS (enormous and increasing number of application calls) and to force its transfer to their servers.
- If the IANA wants to manage its registries so that they can be freely replicated, we may avoid an Internet split. This is why I called a meeting on the matter for the first week of October in Paris.

Status-quo can obviously continue (in the line of the proposed MoU) if language registries are removed from the IANA. This however calls for serious care, because we must make sure that the registry is not subject to external rights negotiated between its non-IETF sources and the hosting service. The currently observed possibilities also show the risk of a major privacy violation and mass profiling that would lead to the rapid fragmentation of the IANA usage by Governments, to protect their citizens' privacy and human rights.

I note that projects such as my MDRS (multilingual distributed registry system) are a major threat to the IANA, should it continue on a solitary, uncertain format, and non-interoperable path. However, we are its strongest ally otherwise.

MDRS is about distributing access to protected, stable, coherent, consistent, and adapted referents to the users of the digital convergence. Among our sources, there is the IANA. If the IANA helps us with stable, documented, clear, free, interoperable information, we will help it remain as a reference. Otherwise, we will need to build our own replacement, with possible errors, without a joint approach of the possible conflicts.

We will identify very quickly where you want to go, through, the way in which you consider this review, and the way you implement a stable commoncomputable style for all the IANA registries and requests. I hope it is documented as part of the MoU. And this MoU is made an RFC, in turn fixing the problem of the current RFC registry diversity.

jfc

Appendix 1 - MDRS position

The MDRS project is an ISO 11179 compliant distributed IANA dramatic extension that is meant to support a "Multilingual/lateral Internet by way of usage" (it stands for Multilingual Distributed Registry System).

- This is an ISO 11179 conformant project as per ISO 11179-3 Part 6 definition (subject to many clarifications, some being under work at the JTC1/SC32/WG2). This is NOT an ISO 11179 strictly compliant project. Many ISO 11179 points are not adapted to the Internet environment, and the IETF has, up to now, opposed ISO 11179 (at the WG-LTRU). The MDRS architecture is based on smart interlinks and universal sub-addressing, very similar to the DNS proven concepts.
- There is no conflict between the MDRS and the way the IANA is understood today. To the contrary, the IANA is one of the sources of reference of the MDRS and both systems should co-exist for decades. However, there is an architectural (and strategic) conflict between the distributed nature of the MDRS and the commercially centralised nature of projects, which would benefit from taking over the IANA functions. This is why we are strong supporters of the IANA survival and independence.

Please note, however, that the MDRS is not neutral regarding the IANA situation. Its smart interlinking permits the MDRS to consider limitless information offerings providing users with an apparent intelligent network - knowledge and services. The IANA may want at some stage to copy parts of the MDRS (what the MoUs permit). We would certainly help with that, either by adapting our solutions for them, or in striving to remain interoperable. We need stable referents, and for the time being the IANA is one of them.

However, there are two possible problems:

- When an IETF specified registry conflicts with usage and the IETF does not want to find a solution. This is the case today for the Eurospeak languages. The still in charge, although obsolete ietf-languages@alvestrand.no mailing list, and its Reviewer, block "EU" as a region, opposing "en-EU", "fr-EU", etc. This circumstances of this (planned?) conflict do not assist in leading things to a peaceful solution. We will most probably often have such cases. In such cases, our solution is to "fake" an IANA source, interlinking an MDRS/IANA differential registry maintained by a partner or by the EU.
- If the IETF wants to copy an MDRS proposition in its own centralised vision. A distributed architecture scales easily. A centralised one does not. The result may be dramatic overloads (as the one threatening the IANA now). This is why, I think you should consider some kind of application firewalling.

We finalise a beta architecture phase. I do not expect a prototype registry/system builder to be tested before September. This is why I called for a meeting that is set for the first week of October in Paris to try to commonly consider the best way to support our registries, starting with our "langroot", which is the basis for any information entry. The date was also chosen in order to be able to publish a report for the Athens IGF meeting.

The difference between the current IANA servers and root servers system and us is that they are centralised and we are distributed. This means that traffic to simply check "en-Latn-us" is in valid may represent millions of heavy calls per day to the IANA servers, but none from users that have a local MDRS resolver. This is the same paradigm as the DNS vs. Hosts.txt.

We meet the same opposition as when asking to transition from the root server system to ISPs and private nets support of DNS and IANA files. As if many people were interested in retaining control, even if only over a portion of the global Internet.

Appendix II - Mail on the IEFT list.

Jeffrey Hutzelman wrote:

Who does or will pay for the IANA function? Does funding come from IASA, ICANN, or some other source?

Ray Pelletier wrote:

To my knowledge, it's ICANN, not the IETF.
Ray

Brian E Carpenter wrote:

Yes, this has been an ICANN contribution to the community since the creation of ICANN, when these functions were transferred from their previous home at ISI.

Harald Alvestrand wrote:

Note: I think we need to define IETF requirements and get them filled, and that this process is one way of achieving that.

If we find that ICANN isn't willing or able to do what we desire from them, we need to go somewhere else for running registries - at least new ones, and possibly old ones too. (There are some old ones with thorny issues attached to them, but new ones don't have that.)

So ICANN doing this "for free" does not mean that we don't get to say how the job is done.

At 14:54 28/06/2006, Brian E Carpenter wrote:

Indeed, and I would like to underline that the current IANA Manager over at ICANN, David Conrad, has been working very closely with us in drafting this SLA. So it isn't based on wishful thinking.

Jefsey Morfin wrote:

Dear Brian,
I doubt Harald here makes wishful thinking either.
Let get real, please.

Dear Harald,
thank you for publicly disclosing what I explained and documented for 18 months as your probable agenda. This makes plain why you and your affinity group attempted to exclude, block, and discredit me, and my organisation's MDRS work, for 18 months. This is also the reason for my own weak to strong winning strategy.

We both know that the issue is the control, the fragmentation, or the evolution of the IANA. Interestingly, this comes only three weeks before the NTIA hearings. Pressures given, taken, or both?

I documented most of the point in an email yesterday, which had a certain audience outside of the IETF.

However, now that you start speaking more openly, I believe we can also start discussing more openly how to prevent a split between the Internationalized US Internet and the Multilingual Internet of the rest of the world. This is why I proposed an open "concertation meeting" (sorry, an en-EU term) on the issue for the first week of October in Paris. I will formalise the invitation and a proposed agenda in a few weeks.

The technical situation is as follows (everyone will understand the underlying political and commercial situation):

1. when you speak of "at least new [registry] ones" you mean "Language Subtags and Extension Registries". Your ietf-languages@alvestrand.no mailing list still controls "how the job is done" today. However, RFC 3066 Bis gives that control to ietf-languages@iana.org. Even with the IESG long appeal delays, I am confident that I will get RFC 3066 Bis applied one way or another.

2. The BCP 47 first part (RFC 3066 Bis) and second part (under IESG approval) organise a potentially enormous computer load on these registries (larger than the entire DNS). The WG-LTRU stubbornly refused to consider it (as well as who would bear the cost). Some WG and your list Members explained that - should it occur - it would be supported as the other Unicode registries, by Unicode Members' servers. An other one stated that one sentence in the BCP 47 second part Draft would prevent it, and an other alluded to a dedicated ISO 639 [paid?] server being under consideration. I have no reason to believe that when you (a BoD Member of Unicode) speak of "somewhere else", you did not run a prior investigation (there are only a few possible "somewhere" locations for such an hosting). May be could you share the estimates with us?

3. Randy Preshun said that when BCP 47 documents are finished (now) we would consider the WG-LTRU

"thorny issues". I see that this is the time. I made ISO 11179 to be currently discussed again at the WG, and you introduce now the idea of an IANA transfer outside of ICANN. These are the two serious alternatives to a IANA status quo that a simple library, or search engine application can blow-up at any moment. They are between a unilateral, IANA centric, internationalized Internet and a multilateral, user centric, multilingual, multitechnology, internetting architecture.

Due to the ICANN SLA, the IETF cannot now largely delay (as it does for my appeals which ask the same question) its choice between:

Plan A. ICANN (USG agency as per the Tunis agreement) receives control of the new IETF-claimed world leadership on languages issues. This is/will obviously be contested by many. All of us also know (from the very beginning) that it will not bear the load anyone can generate through Language libraries.

PLAN B. the IETF believes that its job is to help people to build and operate distributed communications solutions and services, over their common digital ecosystem and devise an architecture for them to do so, as I do with the MDRS (multilingual distributed registry system). I sincerely hope that we can work together on the resulting challenge for the benefit of the Internet and its users.

Plan C. Unicode Members' servers (IBM, Microsoft, Google, Yahoo!, etc.) support a core solution using the CLDR locales files as its "meta user agents". This can certainly work. However, we must understand that:

1. the CLDR limitations (and Search Servers economics) realistically limit the number of supported languages to 150, to the use English as a pivotal language, and make the other 7,500 ISO 639-3 languages, 20,000 ISO 639-6 languages, and billions of specialised socio, professional, and idiolects subject to the BCP 47 part 2 Filtering (cultural kill). All of this along with the economic, political, and societal consequences that one can expect.
2. the operators of the Language Registries will obtain immense intelligence on every user ("tell me what you read, I will tell you who you are"). It is likely that this will lead to IANA fragmentation for foreign user protection. We also know how it will be used by the two-tier Internet.
3. the lack of technical support of so many language issues, which the WG-LTRU refused to consider, makes this limited to only some HTML and XML needs.
4. this will obviously not prevent the plan B Multilingual Internet from developing, especially now that I have obtained the current BCP 47 text and in the IGF context.

If I am wrong in the way I read you, I apologise. If I am right I beg you not to split the Internet.

All the best.
jfc