Dr. Hamadoun Toure

Secretary-General

International Telecommunication Union

Place des Nations

CH-1211 Geneva 20

Switzerland

Re: Comments from Canada on the Fourth Draft of the Report of the Secretary-General to the WTPF

Dear Dr. Toure:

Canada has the pleasure to respectfully submit comments on the 4th Draft of the Report to the WTPF.

**Section 2.3.3 – Internet Protocol (IP)-Based Networks and Management of Internet Resources**

With regard to paragraphs f) through k), with reference to OTT and end-to-end QoS, we recognize that ITU-T has developed some technical standards for QoS on network technologies within its remit, as do many peer SDOs such as IEEE and IETF. However, ITU should not play a role in governing how QoS and OTT are provisioned internationally. Network operators will determine their own QoS through bilateral service agreements, or on the basis of their functional requirements within their networks. Inter-operator QoS is, while possible, creates many challenges; going beyond this with end-to-end QoS is not practical in today’s networks. One operator may classify VoIP traffic with a determined priority; however, another operator may classify this differently based on customer requirements, and practical limitations, among many other factors. As suggested in k) that OTT requires end-to-end QoS would place constraints on OTTs, and would slow innovation of new Internet services, reduce the flexibility of operators in managing their networks and establishing commercial/bilateral agreements.

**Section 2.3.2.3 –**

With regard to paragraph c) iii), a reference is made to WCIT Resolution 3. In order to be consistent with the consensus in the IEG to avoid references to the Final Acts of the WCIT in the draft Opinions, it is suggested that a reference to this Resolution should be avoided, since it did not achieve the full agreement of the participants at the Conference. This would also apply to Resolution 5 referred to on page 15, section 2.3.3 e). However, if the reference to Resolution 3 is maintained, the following wording is suggested: "Resolution 3, like the ITRs themselves, did not receive consensus support. With regards to Resolution 3, a number of Member States thought
it did not accurately reflect the importance and scope of the multi-stakeholder model."

**Section 2.3.3.2 – Internet Naming and Addressing**

still low”, for clarity purposes it should be stated that IPv6 traffic levels remain low compared to IPv4 traffic levels.

Regarding paragraph i), the point that the RIRs are sufficient to address IP address policy is valid, but it should be expanded that the RIR policies have evolved to meet the changing needs of the stakeholders and the environment over time. This is illustrated with the inter-RIR transfer policies. The current processes promote flexibility, since the policies in place encourage adaptation and evolution based on the input from all stakeholders.

In paragraph j), the expression “abuse of Internet resources” is ambiguous, and needs clarification.

In paragraphs k-m), there are many methods to improve the trust in Internet infrastructure, and it is unclear why the focus is solely on RPKI. It should be made clear that RPKI is optional/voluntary, and network operators have other choices to secure routing infrastructure. The application of best practices, such as source address verification, or more thorough peer selection, may be sufficient to reduce the “abuse of Internet resources”. Relying on an infrastructure that uses a “single trust anchor” may cause unease from the perspective of distributed systems.

**Section 2.3.4.1 – Generic Top-Level Domains (gTLDs) under the DNS**

With regard to paragraph i), ICANN has established policies on registering new gTLDs. While it is true that “trademark look-alike” problems do exist, ICANN has strengthened the registration process, especially when combating “phishing” and “free-rider” opportunists with gTLDs.

**Section 2.3.5 – Role of administrations of Member States in the management of internationalized (multilingual) domain names**

Regarding paragraph b), we agree with the view that it is not a patch, but rather an evolution of ASCII to Unicode undertaken through the technical community at IETF and other relevant SDOs. It is unclear to what Saudi Arabia, Sudan and Algeria would prefer, as there currently exist no viable alternatives.

**Section 2.3.5 – Role of administrations of Member States in the management of internationalized (multilingual) domain names**

With regard to paragraph vi), it is suggested that the text after the words “the Internet” be suppressed, and replaced with the following: “Internationalized Internet domain names.......the Internet, must be widely accessible to all citizens, in accordance with international human rights law”.

While it is understood that the Report is not presented as a negotiated text, and that Member States and Sector Members are invited to express their views without challenge, there are statements in section 2.3.1 d) which refer to cybercrime, cyber terrorism and the international security dimensions of cyberspace which have no apparent link to Resolutions 101, 102 and 133. We would prefer, therefore, that these terms not be used.

Regards,

Bruce Gracie