1 August 2012

Mr. Petko Kantchev

Chair of the Informal Group of Experts, World Telecommunication Policy Forum 2013

International Telecommunication Union

Place des Nations

CH-1211 Geneva

Switzerland

**Re: Comments on the third draft report of the ITU Secretary General on the 2013 World Telecommunication Policy Forum (WTPF)**

Dear Mr Kantchev,

The Internet Society (ISOC) would like to thank you for the opportunity to provide comments on the third draft of the Secretary General’s report for the WTPF. As a member of the Informal Expert Group (IEG), we value this opportunity for a multi-stakeholder dialogue and the opportunity to contribute to the discussions to ensure a constructive, and informed outcome.

The comments offered below are preliminary comments and we reserve our right to come back on different aspects of the text.

We have noted that there are differences in how previous contributions have been noted in the recent draft. Where the majority of the changes proposed have attribution noted next to the proposed modifications, there are also other changes inserted into the draft that do not have any attribution and as such have been treated differently. We would suggest that all modifications and additions to the draft be given the same treatment and that the report be reissued.

Moreover, we have noted several inaccuracies in the following paragraphs and would refer to our detailed comments submitted in June 2012[[1]](#footnote-1). Additional comments are proposed below:

2.3.3.2 Internet Naming and Addressing

We would encourage the Secretariat to request expert advice from the NRO and ICANN specifically to improve (a) and (b). Language regarding IPv6 still suffers a degree of subjectivity. We would invite the Secretariat to consider the alternative language ISOC and the UK proposed in June.

2.3.3.3 Dissemination of Information about IP based networks

We would like to invite the Secretariat to consider the language previously proposed by ISOC regarding c) and d). We stand ready to work with the Secretariat on these specific paragraphs.

2.3.4.1 Inclusion of new generic top level domains (gTLDs) under the Domain Name System

Information in this section is misleading and needs to be updated. We encourage the Secretariat to request assistance from the NRO and ICANN to correct and complete the text.

2.3.4.2 Country Code Top Level Domain (ccTLDs)

Information in this section is misleading and needs to be updated. We encourage the Secretariat to request assistance from the NRO and ICANN to correct and complete the text.

With regards to the theme of the Forum, we would like to reiterate our suggestion that the Secretariat focus, in accordance with the mandate of the WTPF, on a forward-looking theme. The WTPF should exchange views on the key policy issues arising from today’s fast changing information and communication technology (ICT) environment. Stakeholders including from the Internet technical and academic community made constructive proposals in this regard. Another useful and related theme could be “***The impact of the Internet development on economic growth and social development***”.

It is important to note that advances in the global information infrastructure are a critical engine for growth in today’s world economy. This must be recognized within the WTPF report as an important attribute of the Internet. The Internet Society would be happy to provide substantive factual information on this issue, including on the development of IXPs.

Sincerely,

Constance Bommelaer

Director, Public Policy

The Internet Society

1. http://www.internetsociety.org/WTPF [↑](#footnote-ref-1)