

INTERNET SOCIETY - Bulgaria

COMMENTS ON THE REPORT OF THE WGIG

We thank the WGIG for their efforts to produce a balanced [report](#) on the question about Internet Governance (IG). We appreciate the work carried out by the WSIS and the WGIG, as it provides a good example of how a well-functioning, mutually beneficial partnership between the public and the private sectors can be instrumental for the development of Internet.

While we appreciate the work, we believe there is more to be done before any further decision for a change is to be taken. The four proposed IG models require a serious in-depth study of all aspects of the influence they might have on the Internet in Bulgaria, should any of them be implemented in real life.

We would like to draw special attention to a fact, highlighted in public by the Government of Bulgaria at the Geneva WSIS PrepComs and the Geneva open WGIG consultations in 2005:

In our country, according to the new Telecommunications Act, the government has no control over the IP address allocation and the DNS management. At the same time there's a joint effort between the government, the private sector (through the ISP Association), the Internet Society and the Academic Network – which formed a Public Internet Registry, to deal with the ccTLD administration.

These are positive signs of how all stakeholders can work on IG-related issues, in cooperation and with mutual respect. We expect that the WSIS will base its decisions not only on the WGIG report, but also on actions of this and other similar positive kinds on the issue of IG.

Taking into consideration all the four models, and keeping in mind a general position of Internet Society Bulgaria that more preparatory work before any of them could be accepted by the global Internet community, here are our comments:

Model 1 keeps the stability the Internet has enjoyed in the last years, but also outlines governments as the key players in the IG. It provides opportunities for countries like Bulgaria to be part of the solution, not part of the problem. However, we feel uncomfortable that in this model, civil society and private sector are given an advisory role – a solution which we don't find good and relevant. We'd like to see this model working better – and perhaps the Bulgarian experience can be used there, too. ISOC-Bulgaria is ready to contribute in the future work upon this model with our know-how.

Model 2 keeps the current model with almost no change. We believe that while it preserves the status quo, which has proven to be successful so far, there is lot that may be done in the field of better involvement of governments in the work of ICANN. The experience of governing the Internet set by the Bulgarian government and Parliament could be used when applying this concept. Under the current legal framework in Bulgaria, the National Regulatory Authority has no control over the DNS and the IP addresses and their management is left to the Bulgarian Internet community. We hope that this is a model which could work in many, if not all, countries. With its accumulated know-how, both in terms of visions and practical experience, ISOC-Bulgaria is ready to contribute in the future work upon this model.

Model 3 requires the establishment of a new body, and a de facto change of ICANN into a UN-type of body. While such an agreement seems adequate, given the multiple court cases where ICANN is involved, further research of this field needs to be carried out before we can develop a more concrete position on this model.

Model 4 also requires the foundation of an UN-type of body, in this case not only a new, upgraded version of ICANN, but also the creation of the GIPC. This model requires even much more in-depth studies before we can decide on the concept and approach it proposes. There seem to be some positive elements in the fourth model: e.g. the functions of all participants within the GIPC are clear in terms of defining areas of interests of the private sector and the civil society. It requires that better and clearer definition of the status of the private sector and the civil society as key stakeholders. In our understanding, they should have status equal to that of the governments. However, this model requires further information before we can take any decisions.

General conclusions:

It is critical for Bulgaria, like for other countries in transition, to build,

maintain and develop proper communications between the businesses, the civil society and the government. They should be equal partners, and coordination between them on the Internet issues should be working really well. We understand the WSIS as part of this process, and we hope it will continue to involve all stakeholders to achieve its goals.

We hope to see that the results of the WSIS and the WGIG will not have negative influence on the way Internet is being run today. We would like to ask all stakeholders to not forget that the Internet has not only changed the way people communicate, but also the way information is being accessed. Therefore it requires a special treatment, with taking in account all of its different aspects. We hope the Internet will continue to encourage freedom of speech and freedom of access to information, while at the same time efforts are needed to preserve privacy and secure personal data.