2015-01-13 14:19 GMT+11:00

Dear Louise,

First, thank you for this public consultation, as Internet, the .vu ccTLD has to evolve too.

I'm System Engineer in Vanuatu.

I will answer to these questions as System Engineer.

here my answers regarding Consultations Questions, there is a lot questions inside, could you answer them please?

1 - the new ccTLD Structure seems to be compliant with ICANN's Best practices, I'm agree with it, it's good to have a ccTLD manager which will supervise the registry and all registrars.

Regarding the regulatory Framework (ccTLD policies), I'm not totally agree with it, The regulatory has to be done for and by the local Internet community in order to respect Vanuatu's needs and Vanuatu's Law.

Regarding the governance, TVL has for the moment an agreement with ICANN to manage the .vu ccTLD. are you aware of the procedure to remove this agreement and create the new one for the TRR?

2 - the Regulatory Framework (ccTLD policies) will impact all businesses in Vanuatu, so it's mandatory to create/update policies with a collective agreement between Vanuatu's government, TRR and local Internet Community. it's mandatory that TRR has to lead the regulatory framework, but all actors in local internet community have to validate all changes and not a small group in government and in TRR.

3 - With the TRR's preferred structure and approach, it will keep outside of policies/restrictions's discussions all local internet community, it necessary to have an external group (business representatives, consultant,...) to validate all policies of .vu ccTLD. It will be better for the Vanuatu's Democracy and freedom of expressions and will prevent any issues regarding several businesses.

4 - If by public resource, TRR means any people can have a domain name .vu for free, it's not a good idea, there is some examples around the world and it's decreasing the reputation of the country economically and on internet too. For the Vanuatu's people and the reputation of Vanuatu, the .vu has to be managed as a public service. As a public service, it will has to manage with equity all requests from any people in Vanuatu and around the world.

Actually, TVL as a Registry is managing the .vu ccTLD as a public service, they are answering to all requests with the same equity. TVL is taking care of all businesses registered and not registered in VUNIC, especially local businesses.

5 - the 'Registrar' service has to be opened to the competition, it will be better for the Vanuatu's reputation on internet to have several Registrars in Vanuatu and around the world.

However, this opening has to done with security. I mean for example for international registrars can be "ICANN-Accredited Registrar" and for local Registrars, they can answer to securities regarding their websites, the security of data's customers and the redundancy of their DNS infrastructure.

6 - I think that a registry service or a registrar service can be done by the same company but this company has to be under the authority of Vanuatu's Regulator. However, all procedures and policies have to be set correctly with collective agreement.

7 - Indeed, the Registrar service opening could open a new portfolio of services for ISP, but once again, it has to be done correctly with security.

8 - <u>part 2 - section 6.1:</u> I'm not agree regarding this part, each label of a domain (label = level) can contain 63 octets, the total number of octets that represent a domain name (i.e., the sum of all label octets and label lengths) is limited to 255 (RFC1034)

<u>part3 - section 8</u>: a- the trr will designate the Registry operator, is there a period defined regarding the Registry's position?

 c- regarding Registrar's accreditation, it will be great that if local internet community will have a vote NOT only the regulator.

 h- The Regulator can't replace Registry operator at ICANN or other international forums, these forums are for administrative AND technical meeting.

<u>part 4 - section 14.5 </u>: How the registry operator will pay bills, employees, servers, bandwidth??? it's a lot of costs and it has to be clarify.

<u>part 4 - section 21</u>: to revoke a registry operator, the Regulator's decision can't be the unique vote, it has to be a vote with the local internet community. if not you can the Regulator will have too much power on ccTLD .vu and it can decrease the freedom of expression and the Democracy.

9 - you covered all aspects of the management of ccTLD .vu, but there is still some questions regarding funding of the future public service ccTLD .vu and details regarding the local internet community's role.

Regards,

SYSTEM Engineer