

Name: Alex Lee

Organization: Huyi Global Information Resources Domain Registry

Submission ID: 152

Questions Concerning the Proposal as a Whole

- 1) Completeness and clarity: Is the combined proposal complete? Each of the operational community proposals contains aspects to be completed in the future when the proposal is implemented. Is the combined proposal specified in sufficient detail such that it can be evaluated against the NTIA criteria?**

- 2) Compatibility and interoperability: Do the operational community proposals work together in a single proposal? Do they suggest any incompatible arrangements where compatibility appears to be required? Is the handling of any conflicting overlaps between the functions resolved in a workable manner?**

- 3) Accountability: Do the operational community proposals together include appropriate and properly supported independent accountability mechanisms for running the IANA functions? Are there any gaps in overall accountability under the single proposal?**

- 4) Workability: Do the results of any tests or evaluations of workability that were included in the operational community proposals conflict with each other or raise possible concerns when considered in combination?**

Questions Concerning NTIA Criteria

- 5) Do you believe the proposal supports and enhances the multistakeholder model? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.**

There needs to be more specificity with regards to an International multistakeholder model. Otherwise, the community runs the risk of perpetuating an Ameri/Eurocentric model that marginalizes non-Western, non-English proficient communities and constituencies.

6) Do you believe the proposal maintains the security, stability, and resiliency of the DNS? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.

7) Do you believe the proposal meets the needs and expectations of the global customers and partners of the IANA services? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary. Please indicate if you are a customer or partner of the IANA services.

We are a domain registry. No. We do not believe that the proposal sufficiently meets the needs and expectations of the global customers and partners of the IANA services. As mentioned in our response to Question 5, there is a lack of attention towards the international community in the proposal. The proposal, in addressing this question, needs to have specific plans for proactively engaging and including global customers into the process that would otherwise, due to cultural and linguistic reasons, might otherwise not be included.

8) Do you believe the proposal maintains the openness of the Internet? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.

9) Do you have any concerns that the proposal is replacing NTIA's role with a government-led or inter-governmental organization solution? If yes, please explain why and what proposal modifications you believe are necessary. If not, please explain why.

10) Do you believe that the implementation of the proposal will continue to uphold the NTIA criteria in the future? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.

Questions Concerning ICG Report and Executive Summary

11) Do you believe the ICG report and executive summary accurately reflect all necessary aspects of the overall proposal? If not, please explain what modifications you believe are necessary.

General Questions

12) Do you have any general comments for the ICG about the proposal?

Huyi Global Information Resources (Huyi Global) is the registry operator for two delegated Chinese top-level domains: 商标 translated as .trademark and 餐厅 translated as .restaurant. Our concerns, interests and recommendations towards to ICG about the proposal center around the importance of having a proactive and engaged constituency of global partners and customers involved in the ongoing IANA community both during the transition and post transition. With IANA's continuing oversight and management of critical root zone management functions and responsibilities as well as towards delegation and redelegation of TLD's, we believe that it is imperative that the non-English speaking communities and constituencies be proactively engaged and involved with all functions related to IANA.

As a registry operator of 2 Chinese language IDN gTLDs, Huyi Global stresses the importance of two-way engagement between IANA and Chinese constituencies including businesses and organizations from within the global Chinese speaking community which, in Mainland China alone, has over 600 million internet users, and which also represents the largest IDN applicant and delegated string constituency in the entire new gTLD program.

Failure to actively and effectively engage the Chinese speaking constituency would result in a profoundly negative impact on this immense constituency as well as on the global internet community. Therefore, we recommend that international constituencies and global partners and customers be included as a specific element to any and all proposals going forward, rather than as bullet points or mentions within other elements. More specifically, in the Names Proposal Overview (Slide 12 of IANA STEWARDSHIP TRANSITION PROPOSAL), we recommend that details be included to the CSC (Customer Standing Committee) that show international and global representation and involvement in the post-transition period and going forward to prevent marginalization of not just Chinese speaking market constituencies, but all non-English speaking constituencies.