CENTR feedback to the Global Digital Compact

Summary $\}$ ($EdZ[\bullet CE \} uu \vee \check{s} \} \vee \bullet$

- **x** CENTR urges governments to refrain from introducing unnecessary and disproportionate barriers to the domain name registration process via national and international legislation, as well as promote balanced and evidence-based policymaking, in order to retain the universal accessibility of essential digital infrastructure, such as the DNS.
- **x** To ensure balanced and evidence-based policymaking, we strongly encourage greater dialogue between policy-makers and the technical internet infrastructure community.
- **x** All stakeholders should support and respect the multistakeholder governance of the DNS, which facilitates the development of common open standards and protocols supporting global interoperability (e.g., standard-setting in the IETF).
- **x** Given the cross-border nature of the technical infrastructure, governments should ensure that data protection regulations are non-conflicting, and that there is no need nor justification for the lowering of data protection standards.
- **x** All stakeholders should recognise that the technical internet infrastructure is not an appropriate point for intervention on content-related issues. Addressing societal problems with purely technical solutions, including through interventions via the technical internet infrastructure, should be avoided.

Introduction

CENTR is the association of European country code top-level domain registries (hereinafter ccTLDs). All EU member state and EEA country ccTLD registries (such as DENIC administering .de for Germany and NORID managing .no for Norway) are members of CENTR. Together, CENTR members are responsible for over 80% of all registered domain names worldwide.

CENTR members are at the core of the public internet, safeguarding its resilience, stability and security. The majority of European ccTLD registries are non-profit organisations, providing an internet infrastructure service in the interest of and in close cooperation with their local internet communities (i.e., registrars, end-users,





rightsholders but also in cooperation with CSIRTs, law enforcement, data and consumer protection authorities, as well as governments).

Notably, ccTLD registries only hold information enabling users to navigate the internet but do not host, store, transmit or control any content online. This is not their expected role; domain name holders are primarily responsible for the use of the domain name and for any related services, such as websites associated with the domain name.

Connect all people to the internet, including schools

a) Core principles

The Domain Name System (DNS) is integral to the functioning of the internet. It performs the essential task of translating IP addresses to human-readable domain names that are used by all connected devices and online services (browsers, e-mail exchanges, streaming services, smartphones and laptops), as well as more invisible infrastructure roles that the internet relies on.

The DNS is a flexible, resilient and scalable infrastructure. It is not linked to a particular device (e.g., an IP address might change, but the domain name remains the same), and ensures reliability via decentralisation and built-in redundancy (i.e., if one server is unreachable, several alternatives can be queried). The DNS is built to withstand heavy workloads, and its underlying technical components have been refined and optimised for over 40 years.

The Global Digital Compact should take into consideration the importance of essential technical infrastructure, such as the DNS, for the stability, resilience and security of the internet.



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The Global Digital Compact should strongly emphasise that universal access to essential infrastructure, such as domain names, is the central tenet of a free, inclusive and open internet.

It is well-established in global internet governance that differences are allowed between the policy arrangements of ccTLDs and gTLDs, and amongst ccTLDs, in particular, informed by national particularities or needs. This model shows that digital autonomy and global interoperability are not mutually exclusive. Bridging these accepted differences, ccTLD registries voluntarily share their experiences amongst peers in different fora - including ICANN, CENTR or Regional Internet Registries (e.g., RIPE NCC) - to contribute to overall online safety.

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Avoid internet fragmentation

a) Core principles

In order to have a meaningful conversation on the avoidance of internet fragmentation, the challenge of defining what it means must first be overcome. CENTR expects that the Global Digital Compact will build on prior work in differentiating between various manifestations of internet fragmentation, foremost the recent framework develope

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