

INTERNATIONAL TELECOMMUNICATION UNION

General Secretariat



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Mr. Paul Twomey

President and CEO

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United States of America

Subject: Applications to ICANN Concerning Telephony Addressing Top Level Domains

Dear Mr. Twomey,

The International Telecommunication Union (ITU) welcomes the opportunity to comment again on applications for new Internet top level domains made to the Internet Corporation for Assigned Names and Numbers (ICANN) that relate to the ITU Telecommunication Standardization Sector's (ITU-T) Recommendation E.164: The international public telecommunication numbering plan.¹ I refer in particular to the application for “.tel” sponsored by Pulver.com, but my comments below are also applicable to any application which could encompass usage of the E.164 numbering plan.

The ITU is an international intergovernmental organization within which governments and the private sector coordinate global telecom networks and services. The ITU currently has 189 Member States and more than 700 Sector Members who participate in the ITU's telecommunication standardization, radiocommunication and development activities.

As I indicated in my previous letter sent to ICANN on this topic on 1 November 2000, the E.164 international public telecommunication numbering plan is a politically significant numbering resource with direct implications of national sovereignty. It is also subject to a multitude of national approaches, regulatory provisions, and, in some cases, multilateral treaty provisions. Thus, any application for a new Internet top level domain name that envisages interfacing with the global telephony addressing system merits careful consideration.

ITU's membership has a clear interest in many issues related to IP-based networks and the Internet, including issues arising out of convergence of telephony networks with IP-based networks, as well as management of the Internet domain name system.² This interest, which has already been demonstrated through the adoption of Resolution 102³ by the ITU Plenipotentiary Conference (Rev. Marrakesh, 2002), has been confirmed by the adoption of

¹ <http://www.itu.int/rec/recommendation.asp?type=items&lang=e&parent=T-REC-E.164-199705-I>

² For a current overview, see <http://www.itu.int/osg/spu/ip/itu-and-activities-related-to-ip-networks-version-1.pdf>

³ <http://www.itu.int/osg/spu/resolutions/2002/res102.html>

Resolution 133⁴ by the ITU Plenipotentiary Conference (Marrakesh, 2002). This Resolution on the one hand, reaffirms the existing role and sovereignty of ITU Member States with respect to allocation and management of their respective country code numbering resources and, on the other hand, instructs the Secretary-General

...

“to take any necessary action to ensure the sovereignty of ITU Member States with regard to country code numbering plans and addresses will be fully maintained, as enshrined in Recommendation E.164 of the ITU Telecommunication Standardization Sector, in whatever application they are used”

In light of the foregoing, I invite you to consult the ITU, in order to consider fully the implications of the provisions of Resolutions 102 (Rev. Marrakesh, 2002) and 133 (Marrakesh, 2002) , as adopted by ITU Member States, as well as ongoing joint ITU/IETF standardization activities (e.g., ENUM) related to subscriber addressing systems used in convergence of telephony networks with IP-based networks, including the Internet.

Yours sincerely,

[signed]

Yoshio UTSUMI
Secretary-General

cc: Mr. Houlin Zhao, Director, Telecommunication Standardization Bureau

⁴ <http://www.itu.int/osg/spu/resolutions/2002/resplen5.html>