Our Ref: 07-1308

15 Jun 2007

Office of the Government Chief Information officer
Commerce, Industry and Technology Bureau
15/F Wanchai Tower
12 Harbour Road, Wan Chai
Hong Kong
Attention: Systems Manager (H)41
(By mail and Fax: 2802 4549)

Dear Sir/Madam,

Re: Comments in Response to the Public Consultation on the Institutional Framework of HKIRC

Hong Kong Internet Registration Corporation Limited (HKIRC) is a non-profit member-based organization designated by the HKSAR Government to administer the registration of '.hk' domain names for the Hong Kong community since 2001.

Our Board welcomes the review and the public consultation on the institutional governance of HKIRC. This is a good time for the review as HKIRC and HKDNR have been operating for nearly six years and our Board has accumulated sufficient experience to judge where the Company can do better and the improvements so required.

Overall, we believe that the consultation paper have addressed the key issues at hand and is helping the Company progress in the right direction. We do have comments on specific points raised in the consultation paper, and they are described as follows (same headings in the consultation paper are used below).

Scope and priorities of the HKIRC

1. It is noted that "Promote Hong Kong as an international centre for e-commerce and to encourage for the benefit of the Hong Kong community a better understanding and use of the Internet and related technology" is no longer within the scope of HKIRC as described in the consultation paper, although it was listed as one of the objects in the Memorandum of Association of the HKIRC. We are of the view that HKIRC, being the administrator of a

critical building block of the local Internet infrastructure, should continue to pursue this object.

2. It is noted that "Administer and manage the allocation of Internet Protocol addresses in Hong Kong" is no longer within the scope of HKIRC as described in the consultation paper, although it was listed as one of the objects in the Memorandum of Association of the HKIRC. We would request the Government to leave the opportunity open for the HKIRC to manage the allocation of IP addresses, ENUM, and other new developments as mentioned in the last dot point ("Future orientation") of paragraph 14 in the consultation paper.

Registry-registrar system

3. We support the view that the one-registry-multiple-registrar model should be adopted to foster competition and provide more customer choices. However we should take the interests of existing registrants as the top priority. We should be careful in accrediting registrars to ensure that they do have the right technical, financial and servicing capability (we should avoid situation like the RegisterFly incident happening at ICANN), and to control the number of registrars to suit the needs and size of the market.

Proposed Mandate and Composition of the Management Board

4. The consultation paper proposes three (3) membership classes, namely Supply Class, Demand Class and Representative Association Class. This approach is not the norm for most ccTLDs, including Nominet, the ccTLD manager for '.uk'. Instead the mainstream for the global ccTLD community is not having a class structure (apart from the distinction of individual and organizational members). Hong Kong needs to consider its specific situation.

Yours sincerely

Jonathan Shea
Chief Executive Officer
Hong Kong Internet Registration Corporation Limited (HKIRC)

c.c.   Christopher To, Chairman of HKIRC