

March 7, 2025

African Network Information Center (AFRINIC)
% Mr. Gowtamsingh Dabee, FCCA ADIT MBA, Appointed Receiver

Re: Continuing AFRINIC's Allocation of Numbering Resources to the Region

Dear Mr. Dabee,

The Internet Corporation for Assigned Names and Numbers (ICANN) is the nonprofit organization charged with ensuring the stable and secure operation of the Internet's unique identifier systems, and in this regard, coordinates the allocation and assignment at the top-most level of Internet Protocol numbers and Autonomous System numbers. Prior to his removal, ICANN had been offering neutral and independent assistance to Mr. V. Virasamy, at his request and in his role of Official Receiver for AFRINIC. Thank you for taking time last week for an initial meeting with ICANN's appointed counsel in Mauritius.

ICANN offers this letter to help introduce and frame AFRINIC's role in the numbering system. This letter explains the import of the core functions performed by AFRINIC and other RIRs, and will be posted publicly on ICANN.org and can be shared with the courts in Mauritius as may be helpful in your work..

Historical Role of RIRs and Specific Role of AFRINIC

One of the reasons the Internet has become the most successful communications medium since the invention of the printing press is because all the devices that are connected to it speak the same language. That language is called Internet Protocol, commonly abbreviated as, "IP". In order for IP to work, every device that connects to the Internet needs an IP address. An IP address is an identifier that allows data packets to go to and from our devices to the sites we need to visit.

But it's not enough for a device to just have an IP address. It needs a *unique* IP address. That way the traffic we send out (a request for a web page to load, for instance, or a connection to our bank's mobile app) comes back to our device, and not to someone else's device.

Because every device connected to the Internet needs a unique IP address to work, the pool of IP addresses is a shared resource. This pool, however, is finite. Because it is both a shared resource and is a finite pool, all the IP addresses must be carefully managed.

These addresses are not managed by a single entity, but they used to be. In the 1980s and early 1990s, when the Internet was still young and relatively small, a central registry managed these IP addresses for everyone. By late 1992, the rapid globalization of the Internet created new administrative hurdles for managing IP addresses. To overcome these challenges, the Internet Engineering Task Force published a plan to transition from a centralized to a distributed regional registry system. The proposal called for establishing continental-scale registries that would operate as neutral, widely-trusted authorities within their geographic areas. These regional bodies would be responsible for managing their territory's IP addresses.

That plan was implemented, and over the next decade-plus, five continental-scale registries were created. After application and vetting, in 2005 AFRINIC was selected as the neutral and widely-trusted entity responsible for managing the IP addresses for all of Africa and parts of the southern Indian ocean.

In this stewardship role, AFRINIC performs three tasks which are critical for the Internet to function:

- 1) AFRINIC processes applications for new assignments of IP address blocks to network operators throughout Africa and the south Indian ocean. This is vital to all of Africa. Any time you build a new network, it needs IP addresses so its devices can connect to the internet. And when an existing network is successful and is growing, it needs more IP addresses for its new devices. AFRINIC is the only entity empowered to assign IP addresses to network operators in Africa and the southern Indian ocean.
- 2) When AFRINIC assigns IP addresses to organizations, they ensure these IP addresses are globally unique. If AFRINIC assigns a block of IP addresses to a university in Burkina Faso, AFRINIC is attesting to the whole world that the particular block of IP addresses is assigned to the university, and they're the only network in the world authorized to use them. Similar to a real estate title company, AFRINIC is responsible for telling the world who owns what, and ensuring there is no conflict.
- 3) AFRINIC writes these IP address assignments down, in a public register that everyone in the world can freely use. This register acts like a phone book. You can lookup a company and see which IP addresses it has been assigned. And you can lookup an IP address and see which company it has been assigned to. Network operators around the world rely on this directory service in order for the Internet to function.

Relationship between AFRINIC and ICANN

As I first explained in a September 2023 note on the relationship between ICANN and AFRINIC (attached hereto), AFRINIC, as one of the five Regional Internet Registries (RIR) selected through a community-developed recognition process, receives blocks of Internet Number Resources from a set of registration functions that are known as the Internet Assigned Numbers Authority (IANA), which are managed by ICANN. ICANN assigns regional level blocks through its IANA Function to RIRs, which are then further allocated by RIRs within their region according to regionally developed allocation policies. This allocation of numbering resources is the core function of an RIR. As AFRINIC explains on its [website](#), “At the core of our mission is the professional and efficient distribution of Internet Number Resources to African Network Operators. AFRINIC plays a vital role in supporting Internet technology development across the continent and fostering Internet self-governance[...].” AFRINIC’s [Bylaws](#) also recognize this core responsibility, specifying “to provide the service of allocating and registering Internet resources for the purposes of enabling communications via open system network protocols and to assist in the development and growth of the Internet in the African region” as the first enumerated responsibility listed under AFRINIC’s powers, at Article 3, Section 3.4.i.

When ICANN allocates resources to RIRs, those resources are provided for the benefit of the global Internet community and the region served by that RIR. Those numbering resources are not assets of the RIR - in fact, the value of the RIR is in its distribution of those resources in accordance with the local policies governing that allocation. The RIR is in a position of public trust over those resources and is

responsible for the further distribution of numbering resources. While each RIR receives allocations of IPv4 address space from IANA, that RIR's role in respect to those addresses is to support the management and public distribution of that public Internet address space within the RIR's region. See <https://afrinic.net/library/126-policy-ipv4-address-allocation-policies>. For IPv6 address space, AFRINIC's policies clearly state "IPv6 address space is a public resource that must be managed in a prudent manner with regards to the long-term interests of the Internet." <https://afrinic.net/policy/archive/ipv6-address-allocation-and-assignment-policy-afpub-2013-v6-001>.¹

The RIR function of distributing resources cannot be used to act for the benefit or protection of a single creditor, member, or group of members.

Cessation of Assignments Harms AFRINIC, the African Continent, and the Internet

ICANN understands that under the Official Receiver, there were limitations placed on AFRINIC's ability to perform assignments of numbering resources. ICANN, through its IANA function, has received at least one formal complaint from an applicant to AFRINIC for numbering resources stating that they have been waiting for months for any communication or assignment. ICANN understands that similar concerns have been raised on AFRINIC's membership mailing lists.

We are hopeful that, with AFRINIC acting under your direction, AFRINIC's assignment work can swiftly restart, so that organizations in AFRICA are no longer denied IP address space to build and grow their networks.

ICANN seeks AFRINIC's assurances that AFRINIC will return to acting in alignment with its core functions and re-start assignments of numbering resources even while work is proceeding to complete the elections for AFRINIC's governing board by the Court's mandate of 25 April 2025. Resource assignment is important today, and cannot wait for a period of months to restart.

ICANN Remains Available to Support Full Restoration of AFRINIC's Governance and Operations

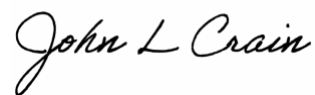
On behalf of ICANN, we stand ready to support a swift running of full and fair elections to restore AFRINIC to governance, with processes developed in alignment with the AFRINIC Bylaws, as feasible. To this effect, ICANN previously identified for the Official Receiver a potential third-party election provider that has previously performed work within the RIR space. While the election work is pending, however, ICANN encourages all involved to consider the election process as separate from restoring basic operations of an RIR. Specifically, ICANN encourages AFRINIC to consider that allowing assignments can be handled separately from defining the eligibility criteria to vote in the elections as ordered by the Court.²

¹ This concept against ownership/assets is akin to the longstanding declaration that "[c]oncerns about 'rights' and 'ownership' of domains are inappropriate. It is appropriate to be concerned about 'responsibilities' and 'service' to the community." as offered in 1994 about domain names, which are another set of unique identifiers on the Internet. See <https://www.rfc-editor.org/rfc/rfc1591.html>, issued in 1994.

Finally, I wish to emphasize and remind AFRINIC of its ongoing obligations to maintain proper records of its registry activities, including customer information that is not otherwise publicly available. ICANN encourages AFRINIC to confirm that it continues to maintain that information in alignment with its obligations under ICP-2 and that such information is regularly backed-up.

We thank all involved for their swift action to restore AFRINIC's assignment work. ICANN remains ready to provide further information or support as necessary.

Best regards,



John Crain
ICANN Chief Technology Officer

cc: Kurtis Lindqvist, ICANN President and CEO
Tripti Sinha, ICANN Board Chair
John Curran, President and CEO, ARIN
Hans Petter Holen, Managing Director, RIPE NCC
Jia-Rong Low, Director General, APNIC
Ernesto Majo, Executive Director/CEO, LACNIC

² ICANN has seen a posting that references a November 2024 court order that sets the date of the initial installation of the Official Receiver (September 2023) as the eligibility cut-off for members to vote in the AFRINIC elections.

Annex: Relationship Between ICANN and AFRINIC

To reach another person on the Internet you have to type an address into your computer - a name or a number. That address has to be unique so computers know where to find each other. The Internet Corporation for Assigned Names and Numbers (“ICANN”) coordinates these unique identifiers across the world. Without that coordination we wouldn't have a functioning Internet.

ICANN was founded in 1998 as a nonprofit, public benefit corporation with a mission of ensuring the stable and secure operation of the Internet's unique identifier systems. As part of this work, ICANN coordinates the allocation and assignment at the top-most level of Internet Protocol numbers (“IP numbers”) and Autonomous System numbers. To do this, ICANN provides registration services and open access for global number registries as requested by the Regional Internet Registries (“RIRs”).

The RIRs are not-for-profit membership-based organizations accountable to their respective regional Internet Number Communities, manage the registration and distribution of Internet Number Resources within their regions. The five RIRs are:

- AFRINIC serving Africa;
- APNIC serving the Asia-Pacific Region;
- ARIN serving Canada, some North Atlantic and Caribbean islands, Antarctica, and the United States;
- LACNIC serving Latin America and portions of the Caribbean; and
- RIPE NCC serving Europe, Central Asia, and the Middle East.

The RIRs receive blocks of Internet Number Resources from a set of registration functions that are known as the Internet Assigned Numbers Authority (IANA), which are managed by ICANN. ICANN assigns regional level blocksthrough its IANA Function to RIRs, which are then further allocated by RIRs within their region according to regionally developed allocation policies. The RIRs also fill a secretariat role, facilitating the open, transparent, and bottom-up number resource Policy Development Process.

The RIRs have a long-standing and straightforward operational relationship with ICANN. ICANN maintains the IANA Number Registries from which the RIRs receive allocations to distribute to the community. The RIRs also coordinate with the IANA to correctly register any resources that are returned to the IANA Number Registries.

ICANN’s relationship with the RIRs, including AFRINIC, is defined through a series of documents. Key documents include:

First, the [Internet Coordination Policy 2 \(ICP-2\)](#), specifies a set of criteria for the establishment of new RIRs. ICP-2 is recognized by the ICANN Board as a statement of

essential requirements for the recognition of new RIRs. While three RIRs predated ICANN's establishment in 1998, ICANN used ICP-2 as the basis to officially recognize and accredit LACNIC as an RIR in [2002](#) and AFRINIC in [2005](#).

Second, ICANN and the five RIRs, collectively acting in their role as the Numbers Resource Organization, are parties to a [Memorandum of Understanding](#) ("MoU") which defines the RIRs role in ICANN's governance and policy development processes. Through the MoU, the RIRs reaffirm ICANN's role in accrediting RIRs.

Third, each of the five RIRs individually are a party to a [Service Level Agreement](#) ("SLA") with ICANN for the IANA Numbering Services. This SLA:

- Affirms the respective roles and responsibilities of the parties with respect to Internet addressing and number resources, in particular: (i) the role of ICANN as the entity responsible for maintaining the stability and global interoperability of the root of the Internet addressing system; and (ii) the role of each of the RIRs as the entity responsible for maintaining the globally unique Internet address and AS number registries for its respective region.
- Defines each party's commitment that decisions relating to the global technical coordination of the Internet resources be taken in the public interest;
- Defines further commitments to the preservation of security, stability and resiliency of the Internet; promotion of trust in the system of Internet governance; and preserving the transparent, bottom-up multistakeholder policy development for technical coordination; and
- Specifies service level expectations for ICANN's performance of the IANA Numbering Function and handling of RIR service requests.