# IANA Stewardship Transition CWG RFP Section 2A Proposal – 3 November 2014 Draft

## **II. Existing, Pre-Transition Arrangements**

### **II.A Relevant Sources of Policy, Principles and Guidelines**

There are a number of key documents that define how the existing IANA functions are carried out. The distinction between ccTLDs and gTLDs is reiterated by the fact that each group uses different documents as their main policy sources. A CWG letter has been allocated to each in the table below to identify the source in the rest of the document. Sources are listed according to date of creation.

CWG	Title	Description	Creator	Date
А	RFC1591 <sup>1</sup>	Created by first IANA operator Jon Postel to describe how the IANA functions were run.	IETF	Mar 1994
В	ICANN Bylaws <sup>2</sup>	The rules surrounding the development, activities and policy development of the Internet Corporation for Assigned Names and Number (ICANN).	ICANN	Nov 1998 (multiple revisions)
С	ICP-1 <sup>3</sup>	A restatement of RFC1591 (Source A) by ICANN over how the IANA functions are run.	ICANN	May 1999
D	Principles for the Delegation and Administration of Country Code Top Level Domains <sup>4</sup>	An effort by ICANN's Governmental Advisory Committee (GAC) to clarify rules over ccTLD delegations and re-delegations	GAC	Feb 2000
Е	GNSO Policy Development Process (GNSO PDP) <sup>5</sup>	Framework for deciding how the generic names supporting organization (GNSO) of ICANN decides policy. Annex A to the ICANN Bylaws (Source B).	GNSO	Dec 2002 (occasional revisions)

<sup>&</sup>lt;sup>1</sup> https://www.ietf.org/rfc/rfc1591.txt

#### Chuck Gomes 11/3/14 3:21 PM

**Comment [1]:** Note that this is a change to the RFP title. Section II.A in the ICG RFP is 'Sources of Policy'. It was changed here because some of the information provided is not actually policy but it relevant to policy and should therefore be included.

<sup>&</sup>lt;sup>2</sup> Archive at: <u>https://www.icann.org/resources/pages/archive-bc-2012-02-25-en</u>

<sup>&</sup>lt;sup>3</sup> https://www.icann.org/resources/pages/delegation-2012-02-25-en

<sup>&</sup>lt;sup>4</sup> http://archive.icann.org/en/committees/gac/gac-cctldprinciples-23feb00.htm

<sup>&</sup>lt;sup>5</sup> Latest version at: <u>https://www.icann.org/resources/pages/bylaws-2012-02-25-en#AnnexA</u>

CWG	Title	Description	Creator	Date
F	ccNSO Policy Development Process (ccPDP) <sup>6</sup>	Framework for deciding how the country code names supporting organization (ccNSO) of ICANN decides policy. Annex B to the ICANN Bylaws (Source B).	ccNSO	Jun 2003 (infrequent revisions)
G	Principles and Guidelines for the Delegation and Administration of Country Code Top Level Domains <sup>7</sup>	A revised and superseding version of Source C by the GAC to clarify rules over ccTLD delegations and re- delegations.	GAC	Apr 2005
Н	GNSO Policy Development Process Manual <sup>8</sup>	A manual for the process followed by the GNSO to create or revise policies (Source E). Annex 2 to GNSO Operating Procedures document.	GNSO	Dec 2011 (occasional revisions)
Ι	GNSO Working Group Guidelines <sup>9</sup>	A best-practice manual for GNSO working groups, used as a key developer of new or revised policies. Annex 1 to GNSO Operating Procedures document.	GNSO	Apr 2011 (occasional revisions)
J	New gTLD Applicant Guidebook <sup>10</sup>	Rules surrounding the creation of new generic top- level domains.	ICANN	Jun 2012
К	IANA Functions Contract <sup>11</sup>	Most recent contract between ICANN and National Telecommunications and Information Administration (NTIA) for running the IANA functions.	NTIA	Oct 2012
L	Framework of Interpretation of current policies and guidelines pertaining to the delegation and re-delegation of country-code Top Level Domain Names <sup>12</sup>	A review of existing policies into the delegation and re-delegation of ccTLDs. Provides guidelines and recommendations for following the current policies.	ccNSO	Oct 2014

 <sup>&</sup>lt;sup>6</sup> Latest version at: <u>https://www.icann.org/resources/pages/bylaws-2012-02-25-en#AnnexB</u>
 <sup>7</sup> <u>https://archive.icann.org/en/committees/gac/gac-cctld-principles.htm</u>
 <sup>8</sup> Latest version at: <u>http://gnso.icann.org/en/council/annex-2-pdp-manual-26mar14-en.pdf</u>
 <sup>9</sup> Latest version at: <u>http://gnso.icann.org/council/annex-1-gnso-wg-guidelines-26mar14-en.pdf</u>
 <sup>10</sup> <u>http://newgtlds.icann.org/en/applicants/agb</u>
 <sup>11</sup> <u>http://www.ntia.doc.gov/files/ntia/publications/sf\_26\_pg\_1-2-final\_award\_and\_sacs.pdf</u>
 <sup>12</sup> <u>http://ccnso.icann.org/workinggroups/foi-final-07oct14-en.pdf</u>

<sup>2</sup> 

In order to provide greater context and understanding, here are additional details on several of the key policy documents.

#### Source A: RFC1591

This document was written in the very early days of the Internet as a "request for comments" (RFC) by the original IANA functions operator Jon Postel. It is a short document intended to outline how the domain name system was structured at that time and what rules were in place to decide on its expansion. The longest part of it outlines selection criteria for the manager of a new top-level domain and what was expected of such a manager.

RFC1591 is one of a small number of critical documents that helped guide the Internet's development and as a result is held in very high regard by the technical community. Since it was created a number of years prior to the creation of ICANN, the document is generally accepted as the policy foundation for the administration of country code top-level domains (ccTLDs), the majority of which do not have a contractual relationship with ICANN.

For the majority of ccTLDs<sup>13</sup> in the Country Code Names Supporting Organization (ccNSO) within ICANN (Source F), the original RFC 1591 is the policy for delegating ccTLDs. However a significant number of ccTLDs neither share a contractual relationship with ICANN nor are members of the ccNSO and so for them RFC1591 is of paramount importance.

However, much of it remains the foundation for the relationship between ccTLDs and IANA, such as the connection between the names of ccTLDs<sup>14</sup> and the international standard ISO 3166. The policies within the document remain directly applicable to both new and existing services, with the notable exceptions of IDN ccTLDs and security protocol DNSSEC.

Although the document remains important for gTLDs, its impact is less significant since almost all gTLD managers are contractually tied to ICANN and many of the policies surrounding IANA have been revisited through the Generic Names Supporting Organization (GNSO) of ICANN and its policy development process (Source E). For a new wave of gTLDs created from 2013 on, RFC1591 has been largely superseded by the "New gTLD Applicant Guidebook" (Source J).

Source C: ICP-1



<sup>&</sup>lt;sup>13</sup> Of the 248 ccTLDs (not including IDN ccTLDs), 152 are members of the ccNSO. The remainder rest outside the ICANN system.

<sup>&</sup>lt;sup>14</sup> Examples being "DE" for Germany (Deutschland) and "US" for United States

This document from the "Internet Coordination Policy" group of ICANN was one of three created shortly after ICANN's creation that attempted to clarify key details over how the domain name system was structured and should be run.

The document specifically addresses ccTLD administration and delegation and was developed before the creation of the Country Code Names Supporting organization (ccNSO). While it argues that it does not represent a change in policy, it proved controversial with ccTLD managers who viewed it as a unilateral restatement of RFC1591 by ICANN.

The document assumes that ICANN has implicit authority over IANA policies due to it being the IANA functions operator: a stance that many ccTLD managers took issue with. The ccNSO later formally rejected the document (arguing in one case that it was "inconsistent with current rules and practices in several areas"<sup>15</sup>). A similar document produced by IANA two years earlier also ran afoul of ccTLD managers<sup>16</sup>.

These restatements of RFC1591 (Source A) without full consultation of ccTLD managers was a source of some tension between ICANN and ccTLD managers and serves to highlight the very different relationship between ccTLD managers and gTLD managers when it comes to the IANA functions. IANA no longer applies the more controversial elements of ICP-1.

#### Source F: ccNSO Policy Development Process

All members of the ccNSO<sup>17</sup> are bound by the policy development process (PDP) developed within ICANN, and all services and activities of ccTLD managers are open to the process. Conversely only members of the ccNSO are bound by the results of any policy process.

The process is well-developed and documented<sup>18</sup> and has been through a number of iterations. In essence, it comprises the following elements:

• Consultations are held with all relevant parts of the ICANN structure, with ccTLD managers and with regional ccTLD organizations<sup>19</sup>.

<sup>&</sup>lt;sup>15</sup> See the final report of the Delegation, Re-delegation and Retirement Working Group of the ccNSO (2011) at: <u>http://ccnso.icann.org/workinggroups/final-report-drd-wg-17feb11-en.pdf</u>

<sup>&</sup>lt;sup>16</sup> ccTLD News Memo #1 (1997): <u>https://www.iana.org/reports/1997/cctld-news-oct1997.html</u>

<sup>&</sup>lt;sup>17</sup> See the full list here: <u>http://ccnso.icann.org/about/members.htm</u>

<sup>&</sup>lt;sup>18</sup> A graphical representation of the process is available here: <u>http://ccnso.icann.org/policy/pdp-15jan13-en.pdf</u>

- The proposal is posted for public comments.
- If there is general support, the council of the ccNSO will take a vote on whether to put it to a wider member approval vote.
- If at least 50 percent of members vote and at least 66 percent of them are in favor, then it is accepted.
- If the voting threshold is reached, the ccNSO council will vote to send the policy to the ICANN Board for adoption.

Since most ccTLDs have well-developed policy processes of their own at the local level, and since the majority of ccTLDs do not have a contractual relationship with ICANN, the policy development process for the ccNSO is used infrequently. In the past decade, only one policy has been developed through to completion (it covered the creation of so-called IDN ccTLDs and took several years to complete).

One important aspect of note is that if the ICANN Board for any reason refuses to implement a policy decided through the ccNSO process, it is prevented from setting policy on that topic. There is no dispute resolution process in the event that the result of a ccNSO PDP is not accepted and implemented. (Note that National Policy Dispute Resolution Processes are outside the scope of the IANA Stewardship Transition Process.)

#### Source G: Principles and Guidelines for the Delegation and Administration of Country Code Top Level Domains

In this category one must also consider the GAC's '*Principles and Guidelines for the Delegation and Administration of Country Code Top Level Domains*' (also known as the GAC Principles 2005), which the GAC regards as formal "Advice" to the ICANN Board and as such is subject to the Bylaws provisions regarding such Advice at the time of submission (details at https://www.icann.org/resources/pages/bylaws-2012-02-25-en#XI.

<sup>&</sup>lt;sup>19</sup> Regional ccTLD organizations, or ROs as they are commonly referred to, are the African Top Level Domains Association (AfTLD), the Asia Pacific Top Level Domains Association (APTLD), the European country code TLD organisation (CENTR) and the Latin American & Caribbean Top Level Domains Association (LACTLD). Many members of such organizations are also members of ICANN's ccNSO and conversely many members of ICANN's ccNSO are also members of one or more of these ROs.



#### **Existing arrangements**

Most broadly, there are two key services that IANA provides to the Names community: delegation and re-delegation (or, more simply, who runs a given top-level domain); and changes to the root zone. Here they are broken out by function numbers and policy source documents.

Service	Function numbers <sup>20</sup>	ccTLD sources (main)	ccTLD sources (supplemental)	gTLD sources (main)	gTLD sources (supplemental)
Delegation and re-delegation	4, 5	А	C, D, F, G, L	J, K	A, B, E
Changes to the root zone	1, 2, 3, 6, 7, 8, 9	A, K	C, F, G	J, K	Е, Н, І

While the IANA functions play a critical role in the proper functioning of the domain name system, it is important to note that the role of both the IANA functions operator and the current provider of the IANA contract (the NTIA) is just one part of a broader process.

Since the delegation/re-delegation processes for ccTLDs and gTLDs are so different, we have kept them separate.

- 1. Delegation and re-delegation of ccTLDs
- 2. Delegation and re-delegation of gTLDs
- 3. Changes to the root zone

In the tables that follow process steps for which the IANA functions operator is involved are highlighted in green and those for which NTIA is involved are highlighted in blue.

1. Delegation and re-delegation of ccTLDs

<sup>&</sup>lt;sup>20</sup> Refer to Section 1.a for the 'List of IANA functions used by the Naming communities'.

[A table for ccTLDs similar to the one in the next section below is being prepared; it hopefully will be available for review not later than 7 November.]

### 2. Delegation and re-delegation of gTLDs

Step	Process Step Description	Done by	:					Function <sup>21</sup>
		ICANN Staff	ICANN Board	GNSO	Registry operator	NTIA	IANA	
2-1	Development of Consensus Policies			х				
2-2	Approval of Consensus Policies		х					
2-3	Implementation of Consensus Policies including:	х		х				
2-3a	Finalization of Registry Agreement	х	х	Х				
2-3b	Approval of gTLD for delegation	х						
2-3c	Execution of Registry Agreements	х			х			
2-4	Pre-delegation testing	х			х			
2-5	Request for delegation by registry operators or by ICANN in the case of EBERO action	х			х			
2-6	Verification of process, policy and technical checks					x	x	2, 5, 6, 7, 8
2-7	Approval of delegation of gTLD					x		
2-8	Change into the root							

<sup>&</sup>lt;sup>21</sup> Refer to Section 1.a for the 'List of IANA functions used by the Naming communities'.

Step	Process Step Description	Done by:				Function <sup>21</sup>		
		ICANN Staff	ICANN Board	GNSO	Registry operator	NTIA	IANA	
2-9	Update root zone Whois						x	3, 6, 8

#### 3. Modification of Root Zone File for ccTLDs and gTLDs

Step #	Process Step Description	Currently Done by	IANA Functions <sup>22</sup>
3-1	Submission of modification request	ccTLD Manager or gTLD Registry Operator	
3-2	Validation of the change request	ICANN Staff	
3-3	Verification of compliance with established policies and procedures	IANA & NTIA	C.2.9.2.b, e & g
3-4	Implementation of the modification in the root zone file if applicable	Root Zone Maintainer	
3-5	Updating Root-Zone Whois	IANA	C.2.9.2.b, e & g

### Description of gTLD Policy Development & Implementation Process Steps

The following table lists documents that provide descriptions of each of the above process steps along with URL links to those documents. Note that references for implementation of gTLD policies are for the current round of new gTLDs. Also note that a GNSO Working Group is presently underway regarding Policy and Implementation, which may impact how policies are implemented in the future.

<sup>&</sup>lt;sup>22</sup> Refer to Section 1.a for the 'List of IANA functions used by the Naming communities'.

Step #	Process Step Description	Reference(s)	URL Link
2-1	Development of Consensus Policies for gTLDs	<ul> <li>ICANN Bylaws, Annex A</li> <li>Visual diagram of the GNSO PDP</li> </ul>	<ul> <li><u>https://www.icann.org/resources/pages/bylaws-2012-02-25-en#AnnexA</u></li> <li><u>http://gnso.icann.org/en/basics/policy-development-process-flow-10jul14-en.pdf</u></li> </ul>
2-2	Approval of Consensus Policies for gTLDs	Section 9 of Bylaws, Annex A	See link above
2-3	Implementation of Consensus Policies for gTLDs including:	Section 10 of Bylaws, Annex A	See link above
2-3a	Finalization of the Registry Agreement, including terms for delegation, re-delegation and modification of name server and contact information for gTLDs	New gTLD Applicant Guidebook, Module 5, Section 5.1	http://newgtlds.icann.org/en/applicants/agb
2-3b	Approval of gTLDs for delegation	Same as for 1.c.i	Same as for 2-3a
2-3c	Execution of Registry Agreements	Same as for 1.c.i	Same as for 2-3a
2-4	Pre-delegation testing of approved gTLDs with an executed agreement	New gTLD Applicant Guidebook, Module 5, Section 5.2	Same as for 2-3a
2-5	Request for delegation by registry operators or by ICANN in the case of an EBERO action	New gTLD Applicant Guidebook, Module 5, Section 5.2	Same as for 2-3a
2-6	Verification that process, policy and technical checks were successfully confirmed	IANA Functions Contract Sections C.2.9.2, C.2.9.2.a, & C.2.9.2.d	http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1- 2-final_award_and_sacs.pdf

Step #	Process Step Description	Reference(s)	URL Link
2-7	Approval of delegation of gTLDs	IANA Functions Contract Section C.2.9.2.d	Same as 2-6
2-8	Delegation/re-delegation of gTLDs into the root	IANA Functions Contract Sections C.2.9.2.d & C.2.9.2.f	Same as 2-6
2-9	Updating Root-Zone Whois	IANA Functions Contract Section C.2.9.2.b	Same as 2-6
3-1	Submission of modification request	IANA Functions Contract Sections C.2.9.2, C.2.9.2.a, & C.2.9.2.b	Same as 2-6
3-2	Validation of the change request	IANA Functions Contract Section C.2.9.2.b	Same as 2-6
3-3	Verification of compliance with established policies and procedures	IANA Functions Contract Section C.2.9.2.b	Same as 2-6
3-4	Implementation of the modification in the root zone file if applicable	IANA Functions Contract Section C.2.9.2.b	Same as 2-6
3-5	Updating Root-Zone Whois	IANA Functions Contract Section C.2.9.2.b	Same as 2-6

# **Description of Policy Dispute Resolution Processes**

<u>ccTLDs</u>

This is included in the ccTLD portion at the beginning of Section II.A.

### gTLDs

The table below lists the dispute resolution processes for each of the process steps for gTLDs along with associated URL links as applicable.

Step	Process Step	Dispute Resolution Process (DRP)	Document Title(s) & URL Link(s)
#	Description	-	
2-1	Development of Consensus Policies for gTLDs <sup>23</sup>	There is no DRP within the GNSO Policy Development Process (PDP) but Section 3.6 of the GNSO Working Group Guidelines contains a Standard Methodology for Making Decisions and Section 3.7 provides an Appeals process.	GNSO Policy Development Process Manual: <u>http://gnso.icann.org/council/annex-2-pdp-</u> manual-26mar14-en.pdf GNSO Working Group Guidelines: <u>http://gnso.icann.org/council/annex-1-gnso-wg-</u> guidelines-26mar14-en.pdf
2-2	Approval of Consensus Policies for gTLDs	<ul> <li>If the Board rejects a GNSO simple majority<sup>24</sup> approved policy, there is no DRP.</li> <li>If the Board rejects a GNSO supermajority<sup>25</sup> approved policy: <ul> <li>GNSO &amp; Board discussion</li> <li>Possible GNSO supplementary recommendation</li> <li>2/3 Board vote required to reject a Council supermajority approved policy.</li> </ul> </li> </ul>	ICANN Bylaws, Annex A, GNSO PDP, Section 9: https://www.icann.org/resources/pages/bylaws- 2012-02-25-en#AnnexA

<sup>&</sup>lt;sup>23</sup> The GNSO develops policy for gTLD second level names and new top level gTLD names according to the Policy Development Process (PDP) in Annex A of the ICANN Bylaws as well as the GNSO Policy Development Process Manual and the GNSO Working Group Guidelines. The working group model is the means used to development policy; participation is encouraged by all GNSO Stakeholder Groups and Constituencies and by ICANN Advisory Committees and other ICANN. Section 3.2 of the Working Group Guidelines states that working groups should "should mirror the diversity and representativeness of the community".

<sup>24</sup> A GNSO simple majority is defined to be greater than 50% in each of the two GNSO Council Houses, Contracted Party House & Non-Contracted Party House.

Step	Process Step	Dispute Resolution Process (DRP)	Document Title(s) & URL Link(s)
#	Description		
2-3	Implementation of Consensus Policies for gTLDs including:	Other than the mention of possibly forming an Implementation Review Team policy implementation processes are not explicitly defined. A GNSO WG on Policy & Implementation is currently in progress and is expected to make recommendations that would better define implementation processes include procedures for dealing with disputes that might arise.	ICANN Bylaws, Annex A, GNSO PDP, Section 10: https://www.icann.org/resources/pages/bylaws- 2012-02-25-en#AnnexA Policy & Implementation WG wiki: https://community.icann.org/pages/viewpage.acti on?pageId=41899467 GNSO Project Page: http://gnso.icann.org/en/group- activities/active/policy-implementation
2-3a	Finalization of the Registry Agreement, including terms for delegation, re- delegation and modification of name server and contact information for gTLDs	For the current round of new gTLDs, this happened as part of step 1.c above. The results are mostly reflected in Module 5 of the New gTLD Applicant Guidebook, which includes the base registry agreement as well as the following DRPs: Uniform Rapid Suspension, Post Delegation Dispute Resolution Process and Registry Restriction Dispute Resolution Process.	New gTLD Applicant Guidebook (AG): http://newgtlds.icann.org/en/applicants/agb

<sup>&</sup>lt;sup>25</sup> A GNSO supermajority is defined as one of the following: (a) two-thirds (2/3) of the Council members of each House, or (b) three-fourths (3/4) of one House and a majority of the other House.

Step	Process Step	Dispute Resolution Process (DRP)	Document Title(s) & URL Link(s)
#	Description		
2-3b	Approval of gTLDs for delegation	For the current round of new gTLDs, Module 1 of the New gTLD Applicant Guidebook (AG) provides an overview of the conditions required for approval for delegation and subsequent modules provide details of those conditions. Module 3 of the New gTLD Applicant Guidebook (AG) contains Objection Procedures and Dispute Resolution Procedures; Module 4 contains String Contention Procedures.	New gTLD Applicant Guidebook (AG): http://newgtlds.icann.org/en/applicants/agb
2-3c	Execution of Registry Agreements	For the current round of new gTLDs, Sections 1.1.5 and 5.1 of the New gTLD Applicant Guidebook (AG) cover execution of the Registry Agreement. A DRP for this step is not applicable.	New gTLD Applicant Guidebook (AG): http://newgtlds.icann.org/en/applicants/agb
2-4	Pre-delegation testing of approved gTLDs with an executed agreement	For the current round of new gTLDs, Section 5.2 covers pre-delegation testing (PDT). It also describes the processes an applicant can take if they do not pass any elements of the PDT.	New gTLD Applicant Guidebook (AG): http://newgtlds.icann.org/en/applicants/agb

Step	Process Step	Dispute Resolution Process (DRP)	Document Title(s) & URL Link(s)
#	Description		
2-5	Request for delegation by registry operators or by ICANN in the case of an Emergency Back End Registry Operator (EBERO) action	For the current round of new gTLDs, Section 5.3 describes the delegation process; it refers applicants to the IANA site for delegation information. In applying for a gTLD string, an applicant agrees to terms in Module 6 of the New gTLD Applicant Guidebook that say "approval is entirely at ICANN's discretion" and an applicant agrees "NOT TO CHALLENGE, IN COURT OR IN ANY OTHER JUDICIAL FORA, ANY FINAL DECISION MADE BY ICANN WITH RESPECT TO THE PLICATION, AND IRREVOCABLY WAIVES ANY RIGHT TO SUE OR PROCEED IN COURT OR ANY OTHER JUDICIAL FOR A ON THE BASIS OF ANY OTHER LEGAL CLAIM AGAINST ICANN AND ICANN AFFILIATED PARTIES WITH RESPECT TO THE APPLICATION." So there is not DRP for this step.	New gTLD Applicant Guidebook (AG): http://newgtlds.icann.org/en/applicants/agb IANA processes: http://www.iana.org/domains/root For more information on EBEROs see: https://www.icann.org/resources/pages/ebero- 2013-04-02-en
2.6	Verification that	Emergency back-end registry operators (EBEROs) are temporarily activated if a TLD registry operator is at risk of failing. As noted earlier in this section, this step is	IANA functions contract:
2.0	vernication that process, policy and technical checks were successfully confirmed	As noted earlier in this section, this step is currently performed by the IANA functions operator and NTIA. Any disputes would be handled according to the terms of the IANA functions contract.	http://www.ntia.doc.gov/files/ntia/publications/sf 26_pg1-2-final_award_and_sacs.pdf

Step	Process Step	Dispute Resolution Process (DRP)	Document Title(s) & URL Link(s)
#	Description		
2-7	Approval of delegation of gTLDs	As noted earlier in this section, this step is currently performed by NTIA. Any	IANA functions contract: http://www.ntia.doc.gov/files/ntia/publications/sf
		disputes would be handled according to the terms of the IANA functions contract.	_26 pg_1-2-final_award_and_sacs.pdf
2-8	Delegation/re- delegation of gTLDs	As noted earlier in this section, this step is currently performed by the Root Zone	NTIA Cooperative Agreement with Verisign: http://www.ntia.doc.gov/page/verisign-
	into the root	Maintainer. Any disputes related to this	cooperative-agreement
		step would be handled according to the Cooperative Agreement between NTIA	
		and the Root Zone Maintainer.	
2-9	Updating Root-Zone Whois	As noted earlier in this section, this step is	IANA functions contract:
	whois	currently performed by the IANA functions operator. Any disputes related to this step	http://www.ntia.doc.gov/files/ntia/publications/sf 26 pg 1-2-final award and sacs.pdf
		would be handled according to the IANA	
		functions contract.	
3-1	Submission of	As noted earlier in this section, this step is	IANA processes:
	modification request	performed by the registry TLD operator.	http://www.iana.org/domains/root
3-2	Validation of the	As noted earlier in this section, this step is	IANA functions contract:
	change request	currently performed by the IANA functions	http://www.ntia.doc.gov/files/ntia/publications/sf
		operator and NTIA. Any disputes related	_26_pg_1-2-final_award_and_sacs.pdf
		to this step would be handled according to the IANA functions contract.	
3-3	Verification of	As noted earlier in this section, this step is	IANA functions contract:
	compliance with	currently performed by the IANA functions	http://www.ntia.doc.gov/files/ntia/publications/sf
	established policies	operator and NTIA. Any disputes would be	<u>26 pg 1-2-final award and sacs.pdf</u>
	and procedures	handled according to the terms of the IANA functions contract.	
		IANA functions contract.	

Step	Process Step	Dispute Resolution Process (DRP)	Document Title(s) & URL Link(s)
#	Description		
3-4	Implementation of the modification in the root zone file if applicable	As noted earlier in this section, this step is currently performed by the Root Zone Maintainer. Any disputes related to this step would be handled according to the Cooperative Agreement between NTIA and the Root Zone Maintainer.	NTIA Cooperative Agreement with Verisign: http://www.ntia.doc.gov/page/verisign- cooperative-agreement
3-5	Updating Root-Zone Whois	As noted earlier in this section, this step is currently performed by the IANA functions operator. Any disputes related to this step would be handled according to the IANA functions contract.	IANA functions contract: http://www.ntia.doc.gov/files/ntia/publications/sf _26_pg_1-2-final_award_and_sacs.pdf