CWG Questions for the Community - Registrar Responses

Below are responses from Registrars to the questions posed in the CWG-Stewardship Discussion Document posed to the community for ICANN 52.   Please note that given the timing, the responses below are not the formal position of all Registrars or even the Registrar Stakeholder Group, but an attempt at coming to a general summary of views.

1. **Do you believe that the transition from the NTIA should happen (Please provide the reasons for your answer)?**

   Yes, the transition of stewardship of the IANA functions from the NTIA should happen. The transition is required for the following reasons:
   - In order for the internet and the structures that govern it to continue to grow and mature
   - To foster global trust in the domain name system
   - To ensure that no one government should has a special relationship with the IANA functions

2. **Are you comfortable with ICANN as policy-maker also being the IANA operator without the benefit of external oversight?**

   Yes, provided appropriate accountability measures are put in place, including the potential for separability. ICANN must be accountable to the global internet community in order for it to remain the IANA functions operator.

3. **Should registries, as the primary customers of the IANA functions, have more of a say as to which transition proposal is acceptable?**

   Yes, this is reasonable for the Names component of the proposal. The variety of Registries (ccTLD,gTLD, brand, etc) and their reliance on the IANA functions gives them a unique and important perspective. Perhaps a better way to recognize the registries in the assessment of of the transition proposal is to acknowledge that their perspectives are the most crucial to a successful transition.

   Registries need to define and assess the operating and escalation procedures, SLAs and dispute mechanisms they need to interact with the IANA functions operator successfully. These are operational elements the Registries deal with regularly and they are therefore ideally placed to determine if the proposal is adequate.

4. **What does functional separation of IANA from ICANN mean to you? (this is not referring to having another operator than ICANN performing the IANA functions but rather the internal separation between ICANN and IANA in the context where ICANN is the IANA operator)**

> Functional separation means that if its required by the community, a new operator could be selected and implemented easily. This means that the personnel, resources and funding for the IANA functions needs to be distinct from that of ICANN. This may require a separate physical location for the functions, as well as its own technical and legal support.

> It also bears noting that this functional separation demarcates the line between policy development and implementation. Policy must remain external to the IANA functions.

5. **Do you believe the IANA function is adequately separated from ICANN under the current arrangements (internal separation)?**

> There is no clear line between ICANN and the IANA functions. IANA appears to share it's resources with rest of ICANN (including ICANN legal) and as a consequence community trust has suffered.   The distinction between these two entities must be better defined and reinforced.

6. **In considering the key factors (such as security and stability, ease of separating the IANA function from ICANN, quality of services, accountability mechanisms etc.) for evaluating the various transition proposals what importance would you give to the ability to separate IANA from ICANN (separability) vs. the other factors?**

> Separability is only one of many factors, but it remains important as it is the ultimate mechanism to ensure accountability.   While the potential for separability must remain in the proposal, the other requirements require closer attention to get right. This means that operational excellence, adherence to SLAs and the security and stability of these core internet functions needs to take precedence.

7. **Given the IANA functions could be separated from ICANN do you believe it would be important for the community to obtain from ICANN on an annual basis the costs for operating IANA including overhead costs?**

> As part of ICANN's overall accountability, being able to easily break out the costs associated with the IANA functions as a whole and then their discrete elements is necessary.

a. **Would it be important to separate out the costs associated with address and protocol functions?**

In the longer term this information could be useful, and again would serve to increase transparency. It does not appear to be immediately crucial.

8. **Could there be unforeseen impacts relative to selecting a new operator for the IANA functions vs the ICANN policy role (should ICANN determine that there will be another round of new gTLDs, how could it ensure that the new operator would accept this)?**

The potential for unforseen impacts exists within any choice, which is why it's imperative that the CWG perform its task with thoroughness and attention to detail. Further, the IANA operator should merely be performing the clerical functions of the RIRs, ccTLDs, IETF and ICANN (with respect to gTLDs), IANA should never be a centre for policy development, lobbying or political intrigue. It should merely be performing the tasks assigned to it according to it SLAs.

9. **Are there other transition models which the CWG should be exploring?**

The CWG should be exploring any model that focuses on operational excellence, holds IANA to clear SLAs and contains a minimum of avenues for disruption. IANA should also be subject to regular independent audits and an external dispute resolution mechanism.