

## Questions for the community:

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

Yes, this is needed, due primarily to two reasons:

- a. the NTIA has always maintained that this transition was on its agenda.
- b. With the politicisation of all matters Internet Governance, this is probably overdue by now. The stewardship that NTIA undertook is (perhaps unfairly) seen in many countries as undue influence from the US government over what goes and what does not go in the Root.
- c. This is an opportunity to strengthen global multistakeholder oversight of this aspect of Internet Governance.

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

Yes - but only provided the the internal accountability mechanisms and right processes are in place to recover from the unlikely scenario that ICANN goes rogue, and provided there is a satisfactory internal separation between policy and operations.

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

No. Registries should have more of a say in the operational oversight of the IANA functions but the NTIA has explicitly asked that a solution be proposed by the Global Multi-stakeholder community and that is understood by our members as a balanced global multi-stakeholder community, free of overreaching influence from a single stakeholder group.

### 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 can be effected through having a separate division of ICANN perform the task. Although it is reasonable to share overhead services such as accounting, human resources and facilities rental with ICANN, the actual IANA operational services, both staff

and perhaps technical infrastructure) should be separate and all finances should be clearly and understandably identifiable.

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

Yes. The priority in any transition is to keep the operational stability and continuity of the Internet's domain name system (DNS). Under the current arrangements, such attributes have been in order ever since the creation of ICANN.

Operational staff seem to be adequately separated. It is unclear if technical infrastructure is. Furthermore there should be additional clarity regarding budgets.

**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?**

Extremely low if present at all. Stability and reliability are FAR more important. And accountability and community control to correct any problem are sufficient to address problems.

The ability to separate IANA from ICANN is important but only as a last case scenario when all other options to reconcile a malfunctioning IANA operator have been exhausted. Furthermore, this ability to separate IANA from ICANN should also be possible if, for instance, ICANN was faced with bankruptcy.

However these are exceptional scenarios and therefore the ability to separate IANA from ICANN is much less of a priority than the more immediate concerns of operational continuity, security and stability, quality of services and accountability mechanisms that are needed from post-transition day 1.

**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?**

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

As stated in replies to earlier question, the finances should be clear regardless of separability. To be able to demonstrate the value of services provided to each community, the costs should be separated out (not only by names, address and protocol functions, but other services that are delivered as well (.int management, ccTLD redelegation responsibilities, etc). If an accounting or law firm can do it, so can IANA). Shared services should be pro-rated over the entire portfolio.

Increased granularity in estimating the costs per function (names, protocols, addresses) may be inaccurate due to the current expansion of the new gTLD space and the unknown forecasts relating to both protocols (http2 for example) and numbers (IPv4 / IPv6). We therefore doubt that this estimation would be accurate.

**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)?**

A concern of our community of end users is that the selection of a new operation for the IANA functions could introduce a lot of unknown unknowns - and this might affect stability and continuity of operations. Any major change such as this one would need to be performed in a cautious and methodical way.

Any IANA operator would be bound to support the results of Policy actions by any of its supported communities. If/when the IETF develops any new protocol such as HTTP2 or even in the far future IPv25 (an upgradable path from both IPv4 and IPv6), IANA would be bound and required to support it.

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

The time to add more models into the mix is drawing to a close.

We need to start eliminating those which have little support, create unreasonable risk and instability, or are not likely to be acceptable to the NTIA and the US Congress.

All transition models proposed thus far should be explored in a fair and non-political way.

Overall: the transition of stewardship of the IANA functions should be undertaken with the aim to keep operational continuity, security and stability, quality of services and accountability mechanisms.