Danish Internet Forum (DIFO) wishes to thank ICANN for the opportunity to comment on "Draft Proposal of the Principles and Mechanisms and the Process to Develop a Proposal to Transition NTIA's Stewardship of the IANA Functions".

DIFO is responsible for the Danish top-level Internet domain, .dk. Its core business is the registration of domain names and the administration and technical operation of the national domain name registry in Denmark.

DIFO acknowledges the great amount of work, which has been done in creating this proposal and the involvement of the internet community. DIFO has the following comments:

**General comments**

DIFO finds that the "Principles" and the "Mechanisms" listed seem relevant and in line with the multistakeholder model. The proposed procedure aims to be community-driven and is building on the multistakeholder process, which DIFO finds is a good way to approach the transition. The stability and security of the IANA functions are essential for a well-functioning global internet, so a careful approach to a new stewardship involving the global internet community is crucial. DIFO also agrees that the scope for the IANA transition does not include issues of cybersecurity, privacy, content etc.

**ICANN's questions relating to this initial draft:**

**Answer to Q1**

The premises of the proposal are that ICANN is the organization which will carry out the transition and implementation of the final solution. While this might be the case even after the transition, on the other hand the methodology and mechanisms suggest a predefined scope of ICANN's SO/AC and "affected parties" as the only organizations feeding into to the steering group. This is not in line with the outreach and inclusive approach that is suggested in the "principles", because these parties do not represent the entire internet community. Many countries are not a member of ccNSO, so in order to ensure a global participation the steering group should have members from other organizations than the SO/AC and "affected parties". DIFO suggests that a member from each regional ccTLD organizations is represented in the steering group.
Answer to Q2 and Q3

The mechanisms suggested seem in general to be relevant and they will ensure that the active part of the internet community is well included in the process. But when it comes to the part of the internet community that is not active and maybe lack the resources to be active there seem to be no mechanisms to ensure their inclusion. This could be done by arranging meetings with ccTLDs and government that are not active yet in ICANN and by involvement of the regional ccTLD communities in order to ensure truly global involvement in this process.

Answer to Q4-Q6

DIFO support the creation of a steering group in order to ensure progress of the process of the transition of NTIA’s stewardship. But DIFO finds that the selection of this group concerning the ccTLDs should be done by the regional ccTLD organization itself just like the organizations “affected parties” are proposed to select their own members. The selection should not be done by the ICANN chair and GAC chair. As mentioned before ccNSO does not represent all countries and using the regional ccTLDs will bring the process closer to the involved parties by ensuring a regional representation is present in the steering group.

Finally it seems unclear in the draft proposal if the community-driven proposals (and in the end the proposals from the steering group) are sent out for comments. It is of great importance to DIFO, that the proposals from the group is sent out for comments within the community and to any other group that might be affected by the outcome of the proposal. Therefore DIFO would like this process to be mandatory to any steering group regarding any outcome from the group before it is sent to ICANN board and NTIA.

On behalf of the Board of Danish Internet Forum, I remain
Yours sincerely,

[Signature]
Lise Fuhr
COO and Political director
Danish Internet Forum