auDA response to ICANN’s call for public input on “Draft proposal, based on initial community feedback, of the principles and mechanisms and the process to develop a proposal to transition NTIA’s stewardship of the IANA function”

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Introduction
.au Domain Administration Ltd (auDA) is the industry self-regulatory, not-for-profit manager of Australia’s “.au” country code Top Level Domain. auDA is an active participant in ICANN and regularly contributes to deliberations and policy development processes within ICANN’s Country Code Names Supporting Organisation (ccNSO).

This document sets out auDA’s response to ICANN’s call for comments on the transition of the IANA function¹ and associated scoping document².

Comments
auDA welcomes the announcement of the National Telecommunications and Information Administration (NTIA) regarding its intention to transition key Internet naming and numbering functions to the global Internet community.³

auDA holds that:

- the NTIA’s announcement is a vital and welcome step in facilitating the empowerment and ongoing engagement of the global multi-stakeholder community in the management of core Internet naming and numbering functions.

- the explicit requirement for the transition process to involve the engagement of, and feedback from, all stakeholders is an important and appropriate stipulation.

- the principles and mechanisms suggested for the for the process are appropriate. auDA welcomes ICANN’s emphasis upon inclusiveness, multi-stakeholderism, pragmatism, accountability and the need to “do no harm”.

¹ http://www.icann.org/en/about/agreements/iana/transition/draft-proposal-08apr14-en.htm
• ICANN is the most appropriate entity to facilitate this process, noting that it is the current IANA contactor and coordinator for the Domain Name System (DNS).

• it is important to note that the ongoing accountability of the operator of the IANA functions is a critical issue, though one which has deemed out-of-scope for the current consultation. This has caused considerable concern among stakeholders, including the ccTLD community. However, auDA also notes that ICANN has very recently announced a separate process for enhancing its accountability “in the absence of its historical contractual relationship to the U.S. Government and the perceived backstop with regard to ICANN’s organization-wide accountability provided by that role.” Although ICANN has explicitly stated a separation between the two current processes, they are closely related and auDA believes that this announcement is a positive and welcome step in allaying the community’s concerns.

• it is appropriate that each Supporting Organisation and Advisory Committee will be represented on the proposed Steering Group. However, the current documentation draws a distinction between the selection of SO/AC representatives (that will selected by the ICANN Board Chair and Chair of the GAC) and other “interested parties” (such as ISOC and NRO) that will select their own representatives. This inconsistency should be remedied or, at the very least, explained.

• it is critical that ICANN, during this consultative process, remains mindful of possible perceptions of partiality or organisational self-interest. auDA’s strongly believes that NTIA has tasked ICANN with the stewardship of an open consultative process and all appropriate steps should be taken to avoid any actual or perceived bias.

• the extrication of the NTIA from its current role is a discreet, achievable element of the evolution of the management of the IANA function, and the appropriate focus of the current consultation. auDA also notes that the scope of the transition proposal excludes issues such as selection of the IANA operator and IANA-related policy development processes. These are important questions and should continue to be discussed and determined separately, most notably within ICANN’s SO’s and AC’s. The current process should do nothing to potentially limit these future deliberations.

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