Comments on the Call for Public Input: 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 Functions

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Public Comment URL:

The undersigned registrars ("Registrars"), some of whom may also present individual comments, respectfully submit the attached comments on the Proposal for the Call for Public Input: 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 Functions

We thank the IANA Team for preparing this proposal.

The Registrar Stakeholder Group is currently reviewing this issue and discussing the ways in which it may impact the global registrar community. We do, however, have initial comments on specific points that have arisen as a result of the Call for Public Input.

Several members of the Registrar Stakeholder Group believe that having two Steering Group representatives for the GNSO will not be sufficient in ensuring that the interests of all GNSO stakeholders are properly reflected. As the GNSO is the largest and most diverse structure within ICANN, we find that a “one size fits all” approach to delegation is not appropriate. Instead, we propose that each SO/AC submit a number of representatives that it believes to be sufficiently representative, but be encouraged to keep the number as small as possible.

With regard to the selection process, we recommend that delegates to The Steering Group should not be selected, chosen or screened by ICANN Staff, as we have seen recently with Expert Working Groups and Strategy Panels.

We propose that to ensure the most effective process, The ICANN Staff avoid top-down engagement with the Steering Group. The Steering Group’s legitimacy with Registrars and other stakeholders will depend upon its ability to choose its own path forward (with public input) and need not accept the staff-produced blueprint for developing a transition proposal. Ideally, the role of ICANN Staff (particularly Executive Staff) would be limited to supporting this effort.

The Registrar Stakeholder Group would like to note that currently, there are three issues are intertwined with this effort that must be considered dependent, or even
prerequisite, issues:

First, the effort to review/improve Accountability Mechanisms must complete before any transition can occur. There is a general belief that existing mechanisms are ineffectual.

Second, we need to understand the technical & operational impacts of this change. Recent events (CZDS outage, TAS "glitch", etc.) clearly indicate that ICANN is not up to the task of operating the Root Zone Maintainer function. Will VeriSign retain this role? If not, who will fill it?

Third, the role of governments is an essential component of the NTIA plan, however this presumes that the GAC’s structure and operation will be similar to how it exists today. The transition proposal should ensure that any potential structural changes by the GAC or other third-parties would not negatively impact NTIA’s requirement that IANA control must not transition to a government or inter-governmental organization.

We respectfully request that the above issues be taken into consideration before a proposal to transition is completed.

Thank you,

Thomas Barrett, EnCirca
John Berryhill, Uniregistry
James Bladel, GoDaddy
Robert Birkner, 1API
Graeme Bunton, Tucows
Jeffrey Eckhaus, eNom
Theo Geurts, Realtime Register
Rob Golding, Astutium
Frédéric Guillemaut, Mailclub
Rob Hall, Momentous
Thomas Keller, 1&1 Internet
Louise Lentino, Instra Corporation
Michele Neylon, Blacknight
Chris Pelling, NetEarth One
Benny Samuelsen, Nordreg AB
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