**Name:** Sivasubramanian Muthusamy

**Submission ID:** 111

Please accept these comments as attached.


Thank you.


Sivasubramanian M [LINK REDACTED]
India
twitter.com/[LINK REDACTED]

**Comments on certain contrarieties of the ICG Iana Transition proposal:**

ICG has approached the task of drafting a proposal for Transition by segmentation of IANA functions as Names, Numbers and Protocol functions and asked the respective communities to develop proposals for the respective functions.

The resultant ICG proposal retains the Names Community's suggestion of a Customer Standing Committee and the Numbers Community's suggestion of a Service Level Agreement.

The Names Community predominantly comprises the Domain Name Registries who are a subset of the larger ICANN organization. With IANA, the Names Community has a relationship of a customer; The Numbers Community administers the Number resources delegated by IANA.  There is a considerable degree of contrariety in the idea of a SLA which would notionally place IANA under the compliance requirements of the RIR SLAs. There is yet another inconsistency of a different nature with the idea of placing the customers on the "business" side of IANA by creating a CSC.

While attention is drawn to these conceptual contrapositions, it must be acknowledged that the required expertise of a specialized nature lies within the people engaged in the management of Domain Registries and the RIRs. While the notion in any level, of any form of oversight, in any degree by the RIRs and Registries over IANA ought to be completely dispensed with, the required expertise to the extent absolutely needed could be drawn from among the people with expertise in RIR functions and Registry operations. That would sufficiently address the RIRs' concerns about performance of IANA functions with sufficient understanding of RIRs' requirements as well as ensure just performance of IANA functions without detriment to its customer needs.

IANA could be constituted as "a structurally separate ICANN division without a mind on its own" without any need for any role at all in the structurally separate IANA for the IETF / RIRs/ Registries (customers)/ Governments and Users as could be seen in context at the comment published at page: https://forum.icann.org/lists/comments-cwg-stewardship-draft-proposal-22apr15/pdfUBLo1BODeP.pdf

If certain elements and structural components are absolutely required, owing to the fact that the protocol Community is not a direct customer, nor performs a role that derives from IANA, such necessary elements of the transition and structural components could be drawn from the IETF and IAB.

The existing arrangements are satisfactory and it would serve the Internet well to continue to rely on the same system of agreements, policies, and oversight mechanisms, not only with respect to the protocol functions, but IANA wide.

IANA transition requires minimal changes, the Transition proposal requires to be simple. IANA could be structurally separate without actually removing Names from Numbers.

With minimal changes, the process needs to wind up to elevate the ICANN Accountability framework by several steps.

Sivasubramanian M

India