

Name: Pierre Bonis

Organization: AFNIC

Submission ID: 117

Please find attached Afnic's submission to the ICG public comment.

Regards,



Pierre **BONIS** *Directeur Général Adjoint* Deputy Chief Executive

Officer

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IANA Stewardship transition Proposal. AFNIC's input.

1. *Please provide your name:*

Pierre BONIS

2. *Please provide your affiliation:*

AFNIC

3. *Are you providing input on behalf of another entity (e.g. organization, company, government)? Yes/No*

No

Questions Concerning the Proposal as a Whole

- 1. Completeness and clarity: Is the combined proposal complete? Each of the operational community proposals contains aspects to be completed in the future when the proposal is implemented. Is the combined proposal specified in sufficient detail such that it can be evaluated against the NTIA criteria?**

The proposal is complete to our point of view, and clear enough. It gives way to the three Operational communities (naming, numbering, and parameters) to have a real oversight on the IANA functions, while maintaining stability and robustness of the overall mechanism. Nevertheless, as noted in X011, we fully support the idea that:

“the names proposal is complete on the condition that the dependencies on ICANN-level accountability mechanisms(...)are fulfilled as specified in the names proposal.”

- 2. Compatibility and interoperability: Do the operational community proposals work together in a single proposal? Do they suggest any incompatible arrangements where compatibility appears to be required? Is the handling of any conflicting overlaps between the functions resolved in a workable manner?**

We don't see any incompatibility between the various parts of the proposal (better said, we feel this is already a unique proposal by the three Operating communities)

- 3. Accountability: Do the operational community proposals together include appropriate and properly supported independent accountability mechanisms for running the IANA functions? Are there any gaps in overall accountability under the single proposal?**

The establishment of the PTI as a separate legal entity from ICANN, together with Customer standing comitee and the Iana Fonction review process are strong mechanisms

to guarantee and independent accountability mechanism run by the stakeholders themselves. Together with the reinforced contractual link between the RIRs and ICANN, and with the continued contractual arrangements between IETF, IAB and ICANN, the IANA functions are all covered and strong mechanisms to maintain and strengthen the SLAs are in place. One should notice that ICANN being part of all proposals, at least as a contractor, need to see its own accountability mechanisms well defined.

Questions Concerning NTIA Criteria

- 5. Do you believe the proposal supports and enhances the multistakeholder model? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.**

Yes, because it gives room to all stakeholders (being direct customers or indirect users) to have a say on IANA performances, and a real power to change the IANA operator if needed.

- 6. Do you believe the proposal maintains the security, stability, and resiliency of the DNS? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.**

Yes, because what works (the technical arrangements, the staff in charge and the competences needed) is reinforced with this proposal.

- 7. Do you believe the proposal meets the needs and expectations of the global customers and partners of the IANA services? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary. Please indicate if you are a customer or partner of the IANA services.**

As a registry, direct customer of the IANA services, we think the combination of the CSC and of the IFR are satisfactory. Furthermore, we note that the redelegation appeals for CCTLDs are part of the policy, and in no way an operational mechanism, and that it's of the responsibility of the CCNSO and the regional organizations reaching to non CCNSO CCTLDs to elaborate a proposal, that isn't needed before the transition take place.

- 8. Do you have any concerns that the proposal is replacing NTIA's role with a government-led or inter-governmental organization solution? If yes, please explain why and what proposal modifications you believe are necessary. If not, please explain why.**

Not at all.

General Questions

Most of the remarks done by Afnic during the second call for comments launched by the CWG IANA stewardship are still relevant, especially:

In the IFR, there should have an equal representation between CCTLDS and GTLDS, both being direct customers and representing various local communities.

Afnic wants to seize the occasion to thank all the participants, and particularly the CWG IANA transition, for the great work, and is confident that, if the condition of a broadly supported accountability framework for ICANN is met, this transition will take place soon.

Afnic also wants to share its full support to the CENTR submission.

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Afnic, is a multi-registry operator of the top-level domains corresponding to the national territory of France (the .fr TLD and those of several of the overseas territories) and of French projects for new Internet top level domains (TLDs). Afnic is a full member of CENTR, the European CCTLD Regional organization.