

**Name:** ICANN Board

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Please see attached.

Thank you.

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## ICANN Board Comment on the ICG Proposal

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ICANN as the current IANA Functions Operator and facilitator of the IANA Stewardship Transition process welcomes this opportunity to provide comments on the ICG Proposal.

First and foremost, the ICANN Board would like to express its appreciation for the hard work done by the ICG members and the three operational communities to produce the ICG Proposal. The result of the work shows once again how a multistakeholder system works and the remarkable level of dedication of many volunteers around the world who are committed to the stability and security of the IANA Functions.

The main focus of the ICANN Board's comments is on the implementation of the proposals by ICANN as the current IANA Functions Operator. While the ICG has asserted that there are no incompatibilities between the three operational communities' proposals received (also known as the CRISP, CWG-Stewardship, and IANAPLAN responses), there are some implementation details and foreseen complexities that will need further coordination with the communities for clarity. As implementation occurs, ways to address the elements of the proposal may evolve, and in our comments below, we have endeavored to highlight some of these and provide the ICG with implementation suggestions.

We do not believe that any of these issues poses a threat to the viability of the final ICG Proposal. We hope that these implementation issues and details can be resolved in the implementation phase, but we urge the community and where needed the ICG to consider these issues and begin to clarify as soon as practicable in the interests of a smooth IANA Stewardship Transition.

Our comments address overlaps and shared resources where coordination among the three operational communities is an essential part of the solution. These include:

- ***New Service Levels and other Operational changes:*** The aggregate of the proposals enumerate a number of requirements that the operational communities expect to be completed in advance of the IANA Stewardship Transition. To implement these requirements, ICANN will need to change its existing systems, procedures and tools, and the implementation of these changes will impact day-to-day IANA operations. We would appreciate recommendations on how to prioritize the number of proposed development projects that compete for the same resource pool of staff. A clear identification of what needs to be completed before the transition, and what can be postponed to after the transition will be very helpful for a transparent implementation phase.
- ***Registry overlaps:*** In some areas, two or more operational communities jointly manage the IANA Functions. Examples of this include the IPv4 and

IPv6 space registries that serve both the RIRs and the IETF (for Special Purpose Address Space – c.f. RFC6890). This same concept applies to the name space where the TLD registry is shared between Accredited TLD registries and the IETF (for Special Purpose Reserved Names – c.f. RFC6761). Given a future possible scenario of a split of the IANA Functions, we note that these services may need to be split into separate registries. To ensure operational security and stability in case of a split, the operational communities will need to work with the IANA Functions Operator to agree on a clear transition plan framework that takes into consideration all possible overlap. ICANN commits to working with the operational communities should a transition be needed and welcomes the inclusion of any suggestions that may have already been discussed.

- ***Relationship between ICANN, PTI, and the operational communities:*** The ICG proposal introduces a new concept and structure for managing the IANA Functions through a new entity known as the Post-Transition IANA (PTI). The ICG Proposal implies that PTI will be providing all IANA Functions services to the operational communities (c.f. ICG FAQ question #5). In addition, the names community suggests an operational relationship directly with PTI, while the other two communities propose agreements directly with ICANN. The ICANN Board seeks more clarity on the implications of these arrangements on ICANN and ICANN's relationship with the operational communities.
- ***Process to determine a successor operator:*** In the case the IANA Functions are split, the ICG Proposal lacks detail on the process that each operational community will use to determine the escalation paths leading to separability, ensuring accountability of a successor, and identifying a successor IANA Functions Operator. The CWG-Stewardship response provided a framework that may be of use to the other operational communities in determining their processes (c.f. P1. Annex M).

We look forward to working with the ICG and the operational communities to clarify the process by which we would handle concerns raised during the comment period and/or the implementation phase.

The ICANN Board has been intently following the IANA Stewardship Transition and related Enhancing ICANN Accountability & Governance processes, and has submitted comments on operational community drafts before their submission to the ICG. Concerns raised in this comment on the ICG Proposal have also been raised in prior comments. For a comprehensive lists of all the ICANN Board's input into the processes, please see <https://www.icann.org/resources/pages/board-input-stewardship-accountability-2015-07-10-en>.