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Please accept Intel's comments on the IANA Stewardship Transition Proposal

Thanks,
Mike Chartier

IANA Stewardship Transition Proposal - Public Comment Form

Disclaimer: The ICG will not use the information collected for any purpose other than analyzing public comments. Submitters' names, affiliations, and comments will be public.

Identifying Information

* Indicates required field

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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?

Intel is pleased to provide these comments on the proposal to transition the stewardship of the Internet Assigned Numbers Authority (IANA) Functions from the U.S. Commerce Department's National Telecommunications and Information Administration (NTIA) to the Global Multistakeholder Community.

Intel is the largest semi-conductor company in the world and for over forty years, as steward of Moore's law, has designed and manufactured the computing power of the Internet. Intel is not a contracted party of ICANN but the uninterrupted performance of the IANA functions that "maintains the security, stability and resiliency of the DNS" is critical to our business. We rely on the IETF to produce protocols that we build into technology to allow for that connectivity; we rely on the global Internet Protocol addressing system of the Regional Internet Registries (RIRs) to allocate addresses so networks can grow and demand more of our products; and, we expect domain names to resolve to a single root location so that users and businesses across the globe see the same information. Without these functions, connected devices will not fully realize their value to improve the lives of everyone on earth.

Intel supports the ICG proposal; we believe it is a solid plan, and find no fundamental flaws that would prevent it being eventually being transmitted, and subsequently approved by the NTIA. We do, however, note a small number of points for improvement and clarification:

- Concerning the overall proposal, Intel supports the creation of a new, separate legal entity, Post-Transition IANA (PTI), as an affiliate (subsidiary) of ICANN. However we believe the ICG

proposal should clarify whether the Numbers and Protocols communities, and Root Zone Maintainer will contract with ICANN or the PTI. It should also be made clear to what extent the Numbers and Protocols communities will participate in the IFR and CSC processes.

- With regard to the domain name community, Intel applauds the hard work and diligence devoted to this proposal. Concerning the Root Zone Maintainer, we agree with the ICG that an *“agreement between the IANA functions operator and RZM that clearly defines the roles and responsibilities of both parties is essential for the secure, stable and resilient operation of the Root Zone of the DNS when the NTIA withdraws from the Root Zone Management process”* and look forward to the development and publishing of the agreement. Intel notes a transition mechanism has been developed by VeriSign and ICANN¹ *“that outlines a technical plan and testing regime for phasing out the largely clerical role NTIA currently plays in this process.”* While the development of this technical plan was *“conducted in confidence at Verisign’s request, for commercial business reasons,”* the development of the IANA functions operator-RZM agreement should be developed in the same multi-stakeholder process as the other agreements such as the ICANN-PTI agreement, for which a draft statement of work (Annex e) and term sheet (Annex s) were attached to the current 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?

The Numbers and Protocols proposals remain essentially unchanged from their development in January and as such reflect their maturity and soundness. As mentioned above the relationship of the numbers and protocols communities to the PTI needed to be clearly defined to allow for the conclusion of the prerequisite service level agreements and MOUs.

General Questions

¹ See *“An Update on the IANA Transition”*; August 17, 2015 by Assistant Secretary for Communications and Information and NTIA Administrator Lawrence E. Strickling; <http://www.ntia.doc.gov/blog/2015/update-iana-transition>

12) Do you have any general comments for the ICG about the proposal?

With regard to implementation and timing, we note that the NTIA plans to extend their IANA contract with ICANN for one year to September 30, 2016². We believe that a year should be adequate time for the transition if ICANN concentrates on implementing those elements, including adopting the requisite bylaw changes identified by the community and NTIA as being preconditions for the transition to occur. However, Intel also recognizes the interdependency of some elements with the work of the CCWG on Enhancing ICANN Accountability. We also will be submitting comments in that consultation

² *ibid*