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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?

No. The proposal has not made a sufficient effort to combine the three proposal in a coherent fashion. One significant example: it's not clear whether two of three main IANA functions will go through the Post-IANA body at all, or go through ICANN directly. Also, the proposal would create two different review bodies for basically the same task. The proposal looks like three ideas squashed together rather than one, single, coherent plan.

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?

See answer to Q1.

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?

No they do not. The process for moving the IANA contract is convoluted and over-complicated and as a result is effectively useless. I counted I believe 10 different steps going through 7 different committees. Two of those committees need to be specially created. At two points there need to be supermajority votes from two main bodies. And the ICANN Board also gets a direct say in the process (it is almost impossible to imagine that the ICANN Board would do anything but block the removal of the IANA function). This is an unworkable approach and need significant revision and simplification. A good point to start would be to review how the NTIA did its public comment period and open tender on the IANA contract.

4) Workability: Do the results of any tests or evaluations of workability that were included in the operational community proposals conflict with each other or raise possible concerns when considered in combination?

The proposal adds unnecessary levels of process and additional bodies.

<u>**Questions Concerning NTIA Criteria**</u>

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.

The proposal needs simplifying. It does not enhance the multistakeholder model because as it stands it would almost certainly add a lot of additional and unnecessary process to the current simple process.

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, but its complexity will also make it harder for the DNS to change and improve over time.

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 whole it is too complicated.

8) Do you believe the proposal maintains the openness of the Internet? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.

I think it would reduce openness from where it is now because the complexity will mean that changes are harder to make. The IANA functions could get stuck in time.

9) 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.

Yes, this proposal does not account for the vital role that the NTIA played. It will impossible for the

plan as outlined to do what the NTIA did a few years ago and put IANA out to tender as well as bring in ideas from the internet community on how to improve the current functions. That improvement process has not been included in this proposal. And the ability to act without an impossibly complex series of policy steps has been lost. In addition, the proposal does not include the key NTIA role of approving changes to the root, and the wording around this critical aspect is poor.

10) Do you believe that the implementation of the proposal will continue to uphold the NTIA criteria in the future? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.

I think as it stands, the proposal would cement ICANN as the IANA operator and provide little or no incentive for it to improve or do more than the bare minimum. It does not encourage pro-active development, and it puts ICANN into a process-drive defensive mode.

Questions Concerning ICG Report and Executive Summary

11) Do you believe the ICG report and executive summary accurately reflect all necessary aspects of the overall proposal? If not, please explain what modifications you believe are necessary.

No, I think the report is overly complex, dense and little if no effort has been made to introduce the topic to anyone that is not already heavily involved in the process. A major communications failure.

General Questions

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

It is too complex. It does not combine the three proposals but just welds them together with ugly and inefficient results. The process for moving the IANA contract is so complex and convoluted as to be worthless.