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**Submission ID:** 134

Please find attached CIRA's response to the draft proposal from the IANA Stewardship Transition Coordination Group

Regards,

Byron

Alissa Cooper  
Patrik Fältström  
Mohamed El Bashir  
Co-chairs of the IANA Stewardship Transition Coordination Group (ICG)  
September 8, 2015

**Re: Response by CIRA to the draft proposal from the IANA Stewardship Transition Coordination Group (ICG)**

The Canadian Internet Registration Authority (CIRA) is the private, not-for-profit corporation responsible for the operation of the .CA country code top-level domain. CIRA is a member of the Country Code Names Supporting Organisation (ccNSO) and a member of CENTR, the Council of European National Top Level Domain Name Registries. I offer the following comments on the ICG's draft proposal on behalf of CIRA.

I commend the members of the ICG on the considerable work they have completed to date. The task set out for them is as challenging as it is important, and I am pleased to see that the members of the ICG have demonstrated the level of commitment necessary to achieve their mandate.

Overall, I believe the ICG's proposal provides a thorough and implementable process to transition the stewardship of the IANA functions from the U.S. Government to the global, multi-stakeholder community. In terms of process, I would like to highlight the ICG's foresight by providing the 'Request for Proposals' in 2014, thereby facilitating a process to integrate the three community proposals in a timely and effective manner. I would also like to commend the ICG on its commitment to the multi-stakeholder model, as evidenced by the diversity of stakeholders consulted with in the development of the proposal.

*Intellectual Property Rights*

In recent weeks, there has been considerable attention given to the issue of intellectual property rights. I do not believe this is an issue that should hinder the progress of the IANA Stewardship Transition process. To this end, I agree with the remarks provided by CENTR in its comment on the draft ICG proposal; that there is no incompatibility between the proposals from the Names, Protocols and Numbers communities with respect to IP rights. I also agree with CENTR that the interim solution provided in the ICANN Board of Directors' statement on the topic of IP rights is an acceptable one.

Furthermore, I fully support the position expressed by the CWG-IANA chairs in their September 2, 2015 comments to the ICG chairs, wherein they state:

“Accordingly, the CWG hereby formally confirms that its position is consistent with that of the other two respondents to the ICG RFP in that it has no objection to the IANA trademarks and the IANA domain names (iana.org, .com and .net) being transferred to an entity independent of the IANA Functions Operator. For the avoidance of doubt, we view the CWG position as also consistent with the ICANN board statement of 15 August 2015 on the same subject.”

*Criteria set out by the NTIA*

CIRA believes that the proposal as presented by the ICG meets all of the criteria set out by the National Telecommunication and Information Administration in March 2014.

In particular, I would like to highlight those criteria set out by the NTIA that most directly relate to CIRA’s operations. CIRA is confident that the mechanisms as presented will not affect the security, stability and resiliency of the Domain Name System (DNS), and will, in fact, result in increased service levels for the names community as the process to make changes to the Root Zone will be streamlined.

*ICP-1*

In my capacity as chair of the ccNSO, I recently wrote to the ICG regarding the need to update certain aspects of their proposal, and make certain other changes to the reference to ICP-1. As the president and CEO of CIRA, I would like to re-iterate these points. That is, that the reference to the status of the Framework of Interpretation Working Group Report be changed from ‘pending’ to ‘accepted in full by the ICANN Board of Directors’. Furthermore, I request that references ICP-1 be removed from paragraph 1036 of the ICG report and that this removal be documented in a footnote as it, and News Memo 1, were never accepted as policy by the ccTLD community.

Once again, I commend the members of the ICG for their hard work and diligence in the development of this proposal. I believe this to be one of the most important initiatives ever undertaken by the global multi-stakeholder community. As such, I encourage the community to implement it in a timely manner.

Byron Holland  
President and CEO  
Canadian Internet Registration Authority