

**Name:** Joyce Zheng

**Organization:** Alibaba Cloud Computing Ltd.

**Submission ID:** 159

Dear Sir or Madam,

Attached is our public comment form for IANA Stewardship Transition Proposal.

Best,

**Joyce Zheng**

Sr. Project Manager

DBU-new gTLDs Alibaba-Elegant Leader Limited

URL: <https://comments.ianacg.org/form>

## IANA Stewardship Transition Proposal - Public Comments Form

*Disclaimer: In addition to the analysis of public comments, ICG will not use the collected information for any other purpose. Submitters' names, affiliations, and comments will be published.*

### Identification Information

*\* Required Fields*

Given Name \* Joyce

Last Name \* Zheng

Email \*REDACTED

Country / Economy Organization / Institution: Alibaba Cloud Computing Ltd.

### Questions Concerning the Proposal as a Whole

- 1) Completeness and clarity: Is the integrated proposal complete? Each proposal submitted by the operational communities includes aspects that need to be done in the implementation phases in the future. Does the integrated proposal provide sufficient details that can be assessed against the criteria put forward by NTIA?

We believe that the integrated proposal is complete, but some details still need modifications. Especially, the composition and mechanism of CSC are not clear; how to truly protect the interests of the top-level domain registries and registrars; and what are the specific measures to ensure balance and fairness among different regions.

Also, some aspects, such as how does PTI work and how to constraint, etc. are not specified.

- 2) Compatibility and interoperability: Do the operational community proposals work together in an integrated 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?

- 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 integrated proposal?

We believe that the details of the accountability are still not clear enough, as the new community mechanism lacks of details, and the specifics of how it works are not reflected, including how to allocate these 29 votes, i.e. whether geographical equity can be reflected. More detailed discussions are needed, as well as its legitimacy.

- 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?

### **Questions Concerning the Criteria Put Forward by NTIA**

- 5) Do you believe that this proposal supports and enhances the multi-stakeholder model? If yes, please explain the reasons. If not, please explain the reasons, and indicate what specific changes you think should be made to the proposal.

Yes. The entire process is discussed and adopted in an open and transparent manner.

- 6) Do you believe that this proposal maintains the security, stability and resiliency of the DNS? If yes, please explain the reasons. If not, please explain the reasons, and indicate what specific changes you think should be made to the proposal.

- 7) Do you believe that this proposal meets the needs and expectations of the global customers and partners of the IANA services? If yes, please explain the reasons. If not, please explain the reasons, and indicate what specific changes you think should be made to the proposal. If you are a customer or a partner of the IANA services, please indicate your identification.

- 8) Do you believe that this proposal maintains the openness of the Internet? If yes, please explain the reasons. If not, please explain the reasons, and indicate what specific changes you think should be made to the proposal.

- 9) Do you concerns that this proposal would replace the NTIA role with a government-led or an inter-governmental organization solution? If yes, please explain the reasons, and indicate what specific changes you think should be made to the proposal. If not, please explain the reasons.

We believe that PTI should not be subject to the law of the United States only. It will affect the interests of other countries.

- 10) Do you believe that the implementation of this proposal will continue to uphold the criteria put forward by NTIA in the future? If yes, please explain the reasons. If not, please explain the reasons, and indicate what specific changes you think should be made to the proposal.

### **Questions Concerning ICG Report and Executive Summary**

- 11) Do you believe that the ICG Report and Executive Summary accurately reflect all the necessary information of the integrated proposal? If not, please explain what specific changes you think should be made to the proposal.

### **General Questions**

- 12) Would you like to give ICG some general comments about this proposal?