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Submission ID: 2

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?

I would prefer it to be stated very explicitly that the proposed Customer Standing Committee applies only to TLD names issues.

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?

It's baroque. The artificial "PTI" body complicates matters for the numbers and protocol parameters community. It is essential for those communities to have direct working relationships with IANA staff, not just a formal contractual relationship at one remove. That said, it's liveable.

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?

For IANA operational functions, I see no accountablity gap. However, I don't see any way that ICANN itself is held accountable for the consequences of its policy decisions (e.g. creating large numbers of unnecessary gTLDs for no discernible motive except money). That is not a new problem and the transition really won't make it worse.

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?

No problem there.

Questions Concerning NTIA Criteria

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.

No problem there.

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.

I've been concerned since 1998 that unchecked expansion of the number of gTLDs will eventually take us into uncharted territory from a technical resilience point of view. I see no technical and operational feedback mechanism to protect us against this operational risk in the proposal. I would like to see a multistakeholder DNS Operations Committee with a clear role in identifying DNS-wide technical issues and pressing for their resolution. This is pretty much orthogonal to the contractual and clerical issues covered in the current proposal.

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.

No problem there. (As an IETF contributor I am an IANA customer.)

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.

The proposal is orthogonal to the question of openness; it neither damages nor enhances openness.

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.

No problem there.

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.

No problem there.

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 problem there.

General Questions

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

No.