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Hello,

Over the last thirteen months, I have closely followed the proceedings of the IANA Stewardship Transition Coordinating Group ("ICG"). As a long-standing member of the Numbers Community, my specific focus has been on the work performed by the Consolidated RIR IANA Stewardship Proposal ("CRISP") team. This work resulted in the Internet Numbers Community proposal now being considered alongside the responses from the Domain Names Community and the Protocol Parameters Registries Community.

My observations are that the Internet Numbers Community proposal:

- was developed in a bottoms-up, inclusive process;
- achieved consensus among the five RIR communities;
- is complete and clear;
- is compatible and interoperable with the proposals made by the other two communities; and
- meets the specific criteria outlined by the NTIA for a successful stewardship transition.

Having considered the comprehensive Proposal to Transition the Stewardship of the IANA Function, I observe that the proposal:

- was produced through a satisfactory bottoms-up process which solicited and received feedback from a global multi-stakeholder community;
- furthers the goals of the global multi-stakeholder governance model by relying on existing and proven bottoms-up and inclusive mechanisms in the Numbers, Domains, and Protocol Parameters communities;
- ensures the ongoing security and stability of the Domain Name System;
- meets the requirements of the direct customers of IANA services;
- ensures the Internet continues to be an open collective of networks; and
- satisfies the requirement that the governance function over IANA services is performed by a non-governmental body.

The proposal represents significant work on the part of the team members of the ICG and members communities and I am pleased to support the proposal generally. As with any proposal this complex, however, there continue to be areas that would benefit from additional clarification. These areas include:

1- While I support the creation of PTI as a separate legal entity, it should have a limited remit and be clearly accountable to the ICANN Board. The current Proposal does not explicitly limit the PTI board's functions or PTI remit. Adjustments should be made to prevent mission creep in the future.

2- The proposed separate review should include a standard for determining whether separation is appropriate. The ICG should clarify what escalation process must occur in order to invoke separation. The current Proposal discusses this only in vague example process terms.

3- Additional clarity is needed regarding the process for authorizing root zone changes. The Proposal notes a need to potentially investigate improving the robustness of operational arrangements for making changes. Any process here should be clarified further before implementation.

4- The ICG should request community approval regarding the potential for division of the IANA functions among multiple operators. Since each community provides for the opportunity to find a new operator, there is the potential that at some point in the future there could be 3 operators. Dependencies among the three separation processes need affirmative community approval.

5- The ICG should harmonize the three proposals further before they are implemented, especially to clarify how the Numbers Community and Protocol Parameters Community will interact with PTI.

6- Changes in stewardship must be accompanied by improvements in ICANN's accountability. The primary point here is that these are mutually interdependent and must be adopted in parallel. Gaps in specificity on accountability measures need to be addressed prior to implementation of the transition.

Thank you for this opportunity to provide comment. I would like to close by extending sincere gratitude to both the team members of the ICG and to the members of the Numbers Community's CRISP team for their excellent work, their dedication, and their perseverance in driving to an acceptable Proposal.

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