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Please find attached an official comment from Dyn on ICG proposal for IANA transition.

Any questions, please do not hesitate to contact me.

Thank you for this opportunity.

Adam

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Dyn appreciates the opportunity to comment on the IANA Transition Stewardship Coordination Group (ICG) "Proposal to Transition the Stewardship of the Internet Assigned Numbers Authority (IANA) Functions from the U.S. Commerce Department's National Telecommunications and Information Administration (NTIA) to the Global Multistakeholder Community" (henceforth, "the proposal"). We thank the Internet community and the ICG for the tremendous collective effort the proposal represents.

To begin with, Dyn wishes to express strongly its general view that now is the correct time for this long-planned transition. The current mechanisms are working. If anyone had doubts that the global, multistakeholder Internet community is prepared to undertake the oversight and stewardship of these important but clerical functions, the development of the proposal ought to put those doubts to rest. The system has been working for about 15 years, it has grown up, and it is time to get any government out of the direct oversight of these functions. The Internet is and always has been made up of various enterprises (many and today mostly private) that use loose coordination for smooth operation of the whole system. Government should not interfere in that function.

Dyn also wishes to express its overall support for the proposal from the ICG. It has been developed according to the criteria that the National Telecommunications and Information Administration (NTIA) outlined in its [original announcement](#).

At the same time, Dyn notes that there are, as expected, several pieces of the proposal that need elaboration and finalization during the implementation phase. As a result, Dyn supports the extension of the Internet Corporation for Assigned Names and Numbers (ICANN) agreement with NTIA for an additional year, while those details are worked out. Dyn's view is that the process of such implementation should include checkpoints during which the Internet community may confirm the details for coherence with the community's shared understanding. Below are some particular issues that Dyn believes need special attention during the implementation phase.

Specific issues for protocol parameters and number resources

Dyn's business depends on the stable, secure, scalable, and smooth operation of Internet infrastructure. Therefore, Dyn depends on the IANA protocol parameters and number resources registries. Dyn's view is that the overall plans for protocol parameters and number resources are in very good shape, and are very nearly complete. We nevertheless observe some details that need to be sorted out.

- The protocol parameters data must be affirmed to be in the public domain.
- The protocol parameters section of the proposal requests that any transition of the protocol parameters registries will be adequately supported; this affirmation needs to be made by the IANA functions operator (ICANN).
- The numbers section of the proposal expects that the ownership of various intellectual property, including the domain name iana.org and the trademarks in IANA, be moved to

some independent third party; we believe this is an important future safeguard and must be completed.

● An agreement between the various Regional Internet Registries (RIRs) and the incumbent IANA functions operator (i.e. ICANN) is needed to ensure the policy independence of the (currently functioning) number resources policy bodies.

Dyn believes that these details will be easily worked out, and therefore the transition will not be blocked by any of them. Dyn nevertheless takes these to be crucial, and expects they will be completed by the time of transition. We would call a transition that did not include these elements incomplete.

In the NTIA announcement, there is no suggestion that the different pieces of IANA might transition at different times. Dyn observes, however, that sound engineering often involves undertaking work in stages. It seems possible to Dyn that the protocol parameters and number resources functions transitions could be undertaken as discrete phases of the overall transition using the plans in the proposal without any damage to the unified IANA.

Specific issues for names

Dyn's business relies on the stable, secure, and scalable operation of the global DNS. That includes the DNS root, and it is primarily that business interest that motivates our view. Dyn also participates in the domain name registration market, but this is mostly a supporting function of its overall business activities.

Dyn understands the diverse interests in the domain name community, and appreciates the way the names portion of the proposal balances those many interests in a way that responds to the various needs. At the same time, Dyn observes that this portion of the proposal is in some ways the most detailed, and yet that seems to have the most significant gaps. In part, this is because several pieces of the proposal are dependent on accountability changes to ICANN. Those changes are not specified in the proposal, and Dyn shall comment on them in the appropriate venue.

Setting aside the accountability issues, however, Dyn notes that the arrangements in the names portion of the proposal are something of a change from the existing state of affairs. It is entirely possible that the new arrangements can be implemented without significant changes to the existing state. For instance, if the Post Transition IANA (PTI) is implemented by a simple transfer of all staff and operations to a new entity, and if that entity truly has no new policy capabilities or discretion to make decisions outside the existing IANA names functions, then the transition will impose very low risk while yet disentangling the registry operation and root zone policy functions (which both reside today in ICANN). It is, however, extremely difficult to evaluate the prospects of such an implementation without a detailed implementation plan. That is not what is available today.

The names portion of the proposal also creates some new mechanisms within ICANN that will require community participation and effort. Dyn has two concerns: the complexity of these new

mechanisms is perhaps greater than one might like, and the details of the implementation of the new mechanisms could close them to the Internet community.

Dyn recognizes, to address the first point, that the community needed to develop a number of new mechanisms quickly. The new mechanisms, including the creation of PTI and all the associated oversight, are all subject to community review. Dyn believes that the community review in the future will provide opportunities to simplify and make clearer the interactions of the various mechanisms. It is therefore important that any implementation include early and frequent review, so that complex mechanisms may be simplified when the Internet interest is thereby better served. Note that this is the interest of the Internet as a whole, and most especially the smooth operation of the IANA names function; it is not to ensure preferences for existing arrangements in the names community or to prefer a current state of affairs over (possibly commercially threatening) alternatives that might emerge over time. Dyn believes this is achievable through existing ICANN processes, assuming they are not restricted by new accountability measures.

On the second issue, Dyn is more worried. Participation in existing ICANN processes and bodies already constitutes a burden for organizations with a commercial interest in that participation. For people and organizations without such a direct commercial interest, it represents an unaffordable luxury. It is therefore of great importance that the implementation of these new, somewhat complicated mechanisms be undertaken with an eye to keeping overhead low, to ensuring little synchronous activity (this includes minimizing meetings and teleconferences), and to operating as far as possible via publicly auditable mechanisms such as mailing lists. Regular attendance at ICANN meetings in far-flung locations should, especially, not be built into the implementation. Most of the new mechanisms ought to be able to accommodate this mode of work: if the Open Source or Free Software communities can produce an entire operating system by using mailing lists, surely the oversight of a fairly modest clerical function (the IANA names function) can work the same way.

In conclusion

Dyn remains strongly supportive of the stewardship of the IANA functions moving away from any direct government oversight, so that the Internet community -- which includes national governments -- may ensure the continued growth and health of the single, global Internet. The Internet is an engine of enormous growth and opportunity. All of the stakeholders on the Internet, including but not only governments, have a critical role to play in that continued growth and health. The Internet is too important for any one body -- even the US Government -- to hold a special stewardship role. We must all do our part, and Dyn believes that the ICG proposal is a way to ensure that.