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Organization: African Regional At-Large Organization (AFRALO)

Submission ID: 35

Dear All,

Please find attached the statement of the African Regional At-Large Organization (AFRALO) on the ICG Proposal put for public comment.

This statement was transmitted to, discussed and approved by all AFRALO members.

Best Regards

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AFRALO Statement on ICG Proposal
4 September 2015

We Members of AFRALO community have been following closely the activities of the ICG and most especially of the 3 operational communities namely the names, numbers and protocol parameters. In view of this we like to present the following view about the first “combined” draft proposal of the ICG that is currently up for public comment by responding to the specific questions asked by ICG:

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?
 - We believe the proposal is sufficient enough to be reviewed against NTIA's criteria as it highlights the mechanisms that each operational community intends to use as a replacement to NTIA oversight rôle. Although the proposals did not indicate the actual SLA text for each operational community in details, it however contain the overall principles/requirements that the SLA must entail which should give NTIA sufficient information on what is proposed. As mentioned in section X016, 41 and 55, the aspect of the root zone maintainer is not mentioned and we believe this is inline with the scope of ICG but we hope/expect that NTIA would initiate(have initiated) a process to address that. We hope that the SLA and the aspect of the root zone maintainer will be fully clarified early enough in the implementation phase.

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?
 - The interoperability of proposal can be said to be assemblage of 3 considering that the process is designed to allow each community determine her path hence there are differences in their choice of solution. However in terms of compatibility, we believe the proposal as presented can co-exist. That said, we find the conclusion of the ICG in paragraph 35 to be “quite predictive” considering that the CWG-Stewardship did not actually indicate to choose to be silent on the IPR issue on IANA TM and domain. To avoid unnecessary second guessing of the operational communities by the ICG, we encourage ICG to follow-up with CWG-Stewardship to ensure they did intend to be silent on the matter. Otherwise we accept and can live with the

suggested view of transferring the IANA TM and domain to IETF-Trust as proposed by numbers community, even though our preference was to leave the IANA TM and domain with ICANN.

- The CWG proposal suggests subcontracting of the IANA function operation for numbers and protocol parameters to PTI, while we have no major concern about this, we do expect that adequate clarity on roles and responsibilities will be necessary considering that both communities intends to contract with ICANN directly. It will be good for the SLA of the respective operational communities to “explicitly” permit such subcontracting possibility as well.

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?

- We believe the proposal from the numbers and protocol parameters has sufficient «independent » accountability mechanism, considering the historical accountability mechanism existing within the 2 operational communities. We recognise that the names proposal has a number of accountability dependencies on the ICANN CCWG on accountability and we expect that the report from that group, if implemented will grant the names proposal adequate independent accountability mechanism as well.
- We are concerned that the CWG-Stewardship on names suggested composition of PTI has too much on names (considering that the GDD executive is also proposed to be on the board) and we recommend that the skill set requirement for the 2 external board member to be sought be balanced across the operational communities.

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?

- We are concerned with possible interference from the review teams proposed hence, we suggest again that the scope of the IFR be clearly constrained such that it does not interfere with the activities of PTI as it concerns other operational communities other than names.
- Apart from the overall cost of maintenance of the various structure proposed, we believe based on the results of the test evaluations that the proposals are operationally workable.

Questions Concerning NTIA Criteria

5. Do you believe the proposal supports and enhances the multi-stakeholder model? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.
 - Even though we disagree with ICG's view (as indicated in paragraph 47) about both CSC and IFR consisting of non-ICANN participants we agree that the proposed solution improves the existing ICANN multi-stakeholder community, and will allow the so called "non-ICANN participants" to participate in the various processes. Hence we believe it enhances the multi-stakeholder model.

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.
 - Its difficult to answer this with certainty because new structures are proposed in the proposal and one can't really tell the practical effect of these processes until we have experienced them. However, theoretically speaking, and depending on the outcome of the root zone maintainer part of the process, we expect the proposal not to affect security, stability and resiliency of the DNS.
 - We assume that the DNS refereed here covers the 3 unique identifiers otherwise its good to point that the question does not appropriately put other operational communities into consideration as the proposal would affect other operational communities one way or the other and NOT just the domain name system (DNS). Inview of this, we believe the views from the other operational communities on this subject matter should be given more attention as well.

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.
 - As Internet end user and actual "indirect" customer of IANA, we would have preferred more balance in representation of the various structure proposed. So while the proposal does not adequately meet our expectation, we can live with what was proposed.

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.
 - Yes we do, this is however to the extent that CCWG on accountability report is implemented.

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.

- Certainly not, instead we see a proposal that allows/ensures participation of various stakeholder even though we would have prepared it be on a more equal footing than proposed.

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.

- Yes we do and again this is based on the overall accountability mechanisms proposed by ICANN CCWG on accountability.

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.

- Not entirely based on our comments on question 2 above, otherwise we believe every other aspect is accurate enough

Finally, we will like to reiterate our support on the request from the National Telecommunications and Information Administration (NTIA) to ICANN to “convene a multi-stakeholder process to develop a plan to transition the U.S. government stewardship role” with regard to the IANA Functions and related root zone management. We also appreciate the extension of ICANN contract by a year, which we believe will further give adequate time for implementation and testing of the overall combined proposal of the ICG. We support the overall formation of the combined proposal of the ICG moving forward and we hope our concerns will be addressed accordingly. We look forward to an improved proposal that further ensures participation of all relevant communities.