

**Name:** Niall O'Reilly

**Submission ID:** 63

## **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?**

The combined proposal is clear and detailed. It appears sufficiently specified for evaluation against the NTIA criteria.

**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 analysis of the diverse functions currently provided by IANA to the three communities indicates complementarity, rather than "conflicting overlaps" between the corresponding operational frameworks. No "compatibility gaps" are apparent at this stage. Independent per-community oversight channels and review processes seem to leave each community with the opportunity to withdraw its support in extreme circumstances. Independent availability to each community of such a sanction seems an important incentive for the PTI to keep itself on course.

**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?**

Apart from the structural gaps identified in the single proposal, the accountability mechanisms appear to be appropriate.

**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?**

As far as I can see, such concerns have been adequately addressed in the single proposal.

## **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.**

The single proposal supports the multistakeholder model by including the existing stakeholder communities in the proposed structures. No modifications are necessary in this respect.

**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.**

The aim of the proposal to maintain "business as usual" for the delivery of the IANA functions is exactly what is needed to maintain the security, stability, and resiliency of all these functions, including the DNS.

**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.**

[See answer to question 6 above]

**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 openness of the Internet is, and will likely remain, a continuing challenge in the face of political and commercial pressures. This proposal does not add to that challenge; neither does it magically remove it.

**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.**

It is clear from the proposal that no "government-led or inter-governmental organization solution" is intended. Here again, maintaining this kind of independence for ICANN and the PTI is likely to be a

continuing challenge, and will require matching vigilance from active and interested stakeholders.

**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.**

Implementation of the proposal can continue to uphold these criteria, but whether it will depends on the future performance of the agencies and stakeholders involved, and their determination to maintain this course.

### **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.**

I believe the ICG report and executive summary accurately reflect all necessary aspects of the overall proposal.

### **General Questions**

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