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Submission ID: 69

Dear Ms. Cooper,

At the outset we wish to thank the IANA Stewardship Transition Group (ICG) for giving us the opportunity to submit our comments on the combined IANA stewardship Transition proposal.

Please find attached a copy of our comments on the draft.

Thanking you and looking forward to favorable consideration of suggestions in the interest of growth of internet in the country.

Yours very truly,

for CCAOI

Amrita Choudhury

Director

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8th September, 2015

Ms Alissa Cooper
Chair
IANA stewardship Community Group (ICG)

Sub: CCAOI's submission to ICG on the IANA Stewardship Transition Proposal

Dear Ms. Cooper,

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CCAOI's comments on the IANA Stewardship Transition Proposal

CCAOI is grateful for getting an opportunity to present its views on the IANA Stewardship Transition Proposal to IANA Stewardship Transition Coordination Group (ICG).

We believe that the time is appropriate for the transition of the IANA function stewardship oversight from NTIA to a global multistakeholder body and congratulate the three operational communities – Names, Numbers and Protocol for coming up with the proposals and ICG for summarizing them into one proposal for community comments. We also applaud the efforts being made by the CCWG accountability group to draft the accountability mechanism of ICANN.

While substantial work has been done, we believe that more work which needs to be done to make the proposal implementable from the operational perspective.

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?

CCAOI Response:

The broad outline of the proposal is in place, however there are few aspects in the proposal which needs to be worked on and be evaluated by the community, so that the same can be submitted to NTIA for evaluation.

The operational communities who have in turn framed their respective proposals, needs in further work out in some cases the details for implementing the same. For example, the Service Level Agreement of the RIRs with ICANN needs to be evaluated properly. Similarly in the names proposal the issue of intellectual property rights of the IANA trademark and domain name (www.iana.org) is yet to be resolved. Also, as the names proposal is dependent on the ICANN Accountability process, this is still not complete.

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?

CCAOI Response:

While in most cases the proposals of the three operational communities work together, the issue of IANA trademark and IANA domain name is yet to be resolved.

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?

CCAOI Response:

While the operational community proposals together include appropriate accountability mechanism, however the ICG proposal proposes to transition the IANA functions seems to be dominated by one stakeholder group – the naming community.

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?

CCAOI Response:

The proposals of the three operational communities are workable and do not seem to have any conflict with each.

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.

CCAOI Response:

The ICG proposal has been drafted based on the proposal each operational community had prepared by involving stakeholders from their respective communities. The process adopted by each community involved using mailing lists, face to face meetings, teleconferences, virtual meetings and call for proposals and comments, indicating that the process was fairly transparent and credible.

While there has been an attempt by the operational communities to involve all stakeholders in the discussion, it was not comprehensive.. It is therefore important for ICG and ICANN to try and reach out to the communities who are still not represented in this forum, such as non internet user communities, new internet users from emerging nations, user who rely on the assisted support of cybercafés/ tele centers/ kiosks for internet access etc. This would truly make the process multistakeholder.

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.

CCAOI Response:

The ICG proposal attempts to maintain the security, stability and resiliency of the DNS.

At the operational level the proposal endeavors to maintain separation between policy development and implementation. Allowing the three operational communities to evolve in a way that facilitates coordination among the registries, changes being proposed at the organization level to ensure independence of oversight, are steps contributing to the overall stability of IANA functions.

However there are some areas which need further detailing.

For example, some aspects of the ICANN Accountability proposal may have implications for both the roles which ICANN handles, the role of policy development for domain names and managing the IANA functions. It is imperative that both ICG and CCWG work together and find suitable way to address this issue so that it does not impact the stability of the IANA operations.

The issue regarding the proper home of the IANA trademarks and the IANA domain names (iana.org; iana.net; and, iana.com) is yet to be resolved. We are of the opinion that the same should be held by an independent body so that it ensures the stability and chances of misuse of these assets.

Also, the role of VerSign as the Root Zone Maintainer needs to be resolved. The agreement of NTIA with the Root Zone Maintainer still remains a concern. While the ICG states that once NTIA withdraws from the Root zone management process, some form of agreement between the RZM and the IANA Functions Operator (IFO) for the Root Zone management will be needed, the proposed note on “Root Zone Administrator Proposal Related to the IANA Functions Stewardship Transition” needs further deliberation.

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.

CCAOI Response:

The proposal to a great extent meets the expectation of the global customers and partners of the IANA services.

However also believe that there should be more outreach to assimilate the views of communities such as new internet users in emerging nations, internet users who rely on assistance of cybercafés/ tele centers' or kiosks, non internet users, etc. who are still not represented in this discussions but are critical for creating a true multistakeholder model and also to ensure balanced decision making.

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.

CCAOI Response:

The proposal maintains the openness of the internet and nothing the proposed ICG proposal restricts the openness of the internet.

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.

CCAOI Response:

The model proposed of creating a new entity (PTI) for managing the IANA transition removes the concern of government control by any other nation. Moreover, a well constructed ICANN accountability process can ensure the integrity of the IANA functions. It is therefore important to ensure that the accountability process is formulated in such a manner that it balances the interests of all stakeholders to safeguard the stability of the ICANN structure and also to prevent capture by any entity post implementation

However as ICANN and the IANA functions would remain incorporated in USA and be governed by US laws, and the agreement of VeriSign with NTIA would be still operational, the role of US government remains a concern to the global community.

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.

CCAOI Response:

Resolving the outstanding issues pertaining to the IANA transition within well defined timelines; laying down detailed processes related to the post transition IANA entity (PTI)



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and the various supporting bodies, such as the CSC; resolution of the IANA domain name and IPR issues; drafting of the SLA's; a well laid out ICANN Accountability process; outreach to involve new communities into the new structure and such other activities would help to ensure that the proposal when implemented will uphold the NTIA criteria in future.

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.

CCAOI Response:

The ICG report and the executive summary to a great extent reflect the aspects of the overall proposal. However, as stated in the above questions, there are areas, where further work needs to be done by the ICG and the three operational teams.

General Questions

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

CCAOI Response:

Most comments have been stated in the above questions.