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To the IANA Stewardship Transition Coordination Group:

The Internet Architecture Board (IAB) appreciates the opportunity to respond to the ICG's "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").

The IAB strongly supports the transition of IANA Stewardship from NTIA to the Global Multistakeholder Community.

The IAB supports the overall ICG proposal. We believe that it meets the criteria laid out by the original NTIA announcement (http://www.ntia.doc.gov/press-release/2014/ntia-announces-intent-transition-key-internet-domain-name-functions) and subsequent remarks. In addition, the proposal was developed in accordance with the early remarks from the IAB about how to proceed (https://www.iab.org/wp-content/iab-uploads/2014/04/iab-response-to-20140408-20140428a.pdf). The proposal was developed by the three directly affected communities, and existing coordination mechanisms were used to ensure overall coherence. As did other groups, the IAB appointed direct participants to the ICG. The resulting proposal demonstrates the multistakeholder process functioning correctly. We believe that the proposal maintains the security, stability, and resiliency of the global DNS and maintains the openness of the Internet.

Naturally, there are some details to be worked out during implementation. The IAB acknowledges and agrees with the IETF IANAPLAN working group consensus that the draft ICG proposal does not pose problems for the protocol parameters function or interfere with the development or safe use of IETF standards.

As the party responsible to the protocol parameters community for the oversight of the protocol parameters IANA functions, the IAB wishes to draw particular attention to some of the remaining details. In addition, in its role as with regard to the overall architecture of the Internet, the IAB wishes to share some additional remarks.

1. Details particular to the protocol parameters registries

The IAB is pleased that the proposal reflects the consensus of the IETF, and we believe that the proposal is therefore adequate to deliver the necessary stability for the protocol parameter functions. We look forward to the necessary positive affirmations that the registry contents are in the public domain and that any future transition would be appropriately supported, as requested in ¶3062 of the proposal.
We observe that the ICG proposal creates a new ICANN affiliate to perform the IANA duties, the Post-Transition IANA or PTI. Notwithstanding that, we understand that the existing MoU between the IETF and ICANN will continue without change. That is, the MoU remains the basis for the administration and maintenance of the protocol parameters registries. This means that ICANN will be effectively subcontracting the performance of its obligations to the PTI. We have no objection to this mode of operation because we understand that the obligations themselves will remain with ICANN. As a matter of implementation, we expect ICANN to make provisions for the continued delivery of service at the level of historical norms. The IAB observes that the ICG proposal confirms that expectation; it is expressed especially clearly in ¶3061. We are pleased that the creation of PTI does not affect the continued operation of any of the existing MoU, including the ability of ICANN or the IETF to end that agreement with appropriate notice.

2. Remarks more general to IANA

The IANA function function is purposefully limited and intrinsically constrained to lie outside of policy determination, yet the IANA is still a critical function. Therefore, large changes to how it operates must be undertaken with care.

The IAB understands that the plan to create the PTI is intended to address issues identified by the names community. Some portions of the proposal, including much of Part I, contemplate significant participation by the various operational communities in new bodies and committees. However, the IETF continues to be satisfied with the existing working arrangements with the IANA staff and their delivery of the protocol parameter functions. We believe these arrangements will remain as effective as before the transition. Because the existing MoU and annual SLAs govern the relationship with ICANN as relates to the IANA functions, we have no current intent to place IETF representatives on additional committees whose primary duty is to judge the effectiveness of IANA (or ICANN more generally) for other IANA functions, though we are thankful for the opportunity to provide representatives to monitor the operations.

The IAB currently has liaison relationships with the ICANN Board and RSSAC, and additional liaison relationships can be established with other communities if this is mutually desired. Perhaps more importantly, the IAB and IETF have many cross-community informal relationships that enable cooperation without resorting to bureaucratic channels of communication. Informal and loosely-coupled coordination has worked well in the past, and it produced the coherent ICG proposal without formal liaisons among the communities. We believe that this web of relationships is a strong expression of the multistakeholder model, and that there is no need to concentrate these relationships within new ICANN structures. The IAB does not oppose additional formal links in principle if they are found to be useful in the future, and we believe we have all of the necessary mechanisms for adding them. In general, however, we prefer informal coordination and
communication among the communities, and we generally prefer to avoid creating additional organizational structures. We believe this organizational model reflects the way the Internet works.

Respectfully submitted,

Andrew Sullivan

For the IAB