Name: Shigeki Goto

Organization: Japan Network Information Center (JPNIC)

Submission ID: 78

To whom it may concern,

Please find attached response from Japan Network Information Center (JPNIC) on the ICG Consultation on IANA Stewardship Transition Proposal.

Sincerely,

Shigeki Goto

President

Japan Network Information Center

IANA Stewardship Transition Proposal - Public Comment Form

Disclaimer: The ICG will not use the information collected for any purpose other than analyzing public comments. Submitters' names, affiliations, and comments will be public.

Identifying Information

* Indicates required field

First Name:*   Shigeki

Last Name:*   Goto

Email Address:*   REDACTED

Country/Economy: Japan

Organization: Japan Network Information Center (JPNIC)

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?

▌ Protocol Parameters: The community proposes to maintain the existing mechanism which is and has been functioning. We do not see any unclear points.

▌ Number resources: The essential feature of the service level agreement (SLA) to be arranged between IANA Function Operator (IFO) and RIRs and the structure of the Review Committee are clearly defined.

While it is not directly relevant the essence of the proposal, we would suggest the improvement of the diagram in p.10 of the draft proposal, in which the relationship between the review mechanism of Number Community and PTI which practically assumes IFO is unclear. Unlike the protocol parameters, and CSC for names function, the arrow for performance review points to ICANN. It needs to have consistency in what the arrow represents for accurate understanding.

▌ Domain Names: It is clearly constructed by Post Transition IANA (PTI), IANA Function Review Team (IFRT), and Customer Standing Committee (CSC). Further, the standard of IANA Function Review (IFR) is considered appropriate.

Although each of the proposals from the above three Operational Communities (OCs) have different natures based on the ways by which they have managed

the respective resources until now and have remained particulars to be defined in the course of the implementation, those are constructed well enough as a skeleton of the mechanism to secure the smooth oversight of the post-transitioned IANA function as well as those have enough details to fulfill the criteria set by NTIA.

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 proposals from Number Resources and Protocol Parameters communities will not be inconsistent nor incompatible with the stewardship mechanism of another resource since they don't provide any element which involves the resource other than each respective one. That from Domain Name community, however, proposes PTI to perform the IFO role instead of ICANN, which is the only part that involves the other resources. However, we conclude that establishment of PTI does not fundamentally affect the relationship with the IFO proposed by the Protocol Parameters and Number Resources communities.

For handling intellectual property rights (IPRs), we agree with the ICG's assessment that the proposals from three operational communities are compatible. This has been clearly confirmed by the CWG-Stewardship that their position is consistent with the combined ICG proposal on the IPR.

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?

Proposals by three OCs, because of their very straightforward structures that the organization representing the OC who is the direct stakeholder and customer have the stewardship, have self-evident independent accountability mechanism. Since the IANA function directly means the aggregate of the dodger management of the three resources, the overall accountability of the IANA function directly means the aggregate of the accountability of those three resources. Therefore, there is no need of additional accountability mechanism to fill the gap among three.

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?

Sections P1.IV.C, P2.IV.C, P3.IV.C in the draft proposal describe the tests and evaluations of workability of new technical or operational methods. Number Resources (P2) and Protocol Parameters (P3) conclude they are workable

because there is any new operational and technical methods for the IANA Functions Operator. Domain Names (P1) concludes them workable as the result of evaluation of the proposed schemes including PTI. We support these conclusions and think that there is not any point which is inconsistent with those of the others. PTI may be raised as a possible concern when considered in combination, but we believe there will be no problem as we explained in 2).

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.

Yes. As shown in the section X019[1] of the draft proposal, it has the stewardship mechanism which inherits the multistakeholder process which is existing and proven through the policy development which each OC has been working on until today.

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.

Yes. The oversight mechanism ever has little impact for operational security, stability and resiliency of the DNS. The proposed stewardship mechanism inherits the existing and proven process which each OC has applied in each policy development for the standardization or resource management. It is highly expected to maintain the security, stability and resiliency which the policy development of each OC has brought to the Internet until today.

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.

Yes. The draft proposal, which has been developed by the communities including the representative entities of OCs which are the global customers and partners of the IANA services, self-evidently meets the needs and expectations of them. As the respondent of this comment, JPNIC is one of National Internet Registries which administers number resources in Japan, and a global customer of the IANA services.

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[1] X019 original text: The ICG has concluded that the combined proposal supports and enhances the multistakeholder model because it leverages existing multistakeholder arrangements, processes, and paradigms in defining the post-transition IANA oversight and accountability mechanisms. Each component of the proposal has this feature.

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. The IANA function is the very foundation of the Internet infrastructure, and its stewardship mechanism hasn't been sufficiently open for the global Internet community. The draft proposal proposes to make it open to the global Internet community with its own engagement. Therefore, the openness of the Internet will be not only maintained but rather, it will be promoted.

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.

No. Each OC, which will succeed the stewardship from NTIA, is an inclusive community in each way. Government and government officer may of course participate in these communities as one of the many participants, which never means the community is government-led or inter-governmental organization. It is quite unlike that OCs would be as dominated by governments or inter-governmental organizations as they replace the position of NTIA, since that is against the multistakeholderism and not in line with the intention of the OCs.

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. The NTIA criteria is completely consistent with what the global Internet community has aspired as the way to operate the Internet as well as how the IANA should be. With this, the global Internet community will only explore the higher standard of the criteria and never choose the way of not meeting it. Even if some people try to change the criteria, that will fail to get sufficient support from the entire OC which holds check-and-balance system within itself.

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.

Yes. We believe they accurately reflect all necessary aspect of the overall proposal.

General Questions

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

JPNIC expresses a clear support on this draft proposal. As with any mechanism, unexpected issues may be found, and we expect the global Internet community will avoid them by periodical review and improvement of the mechanism.

As we have expressed as response to the questions, the draft proposal meets the NTIA criteria and is perfectly consistent with what the global Internet community has aspired as the desired, net form of stewardship of the IANA function which is the indispensable foundation of the operation of the Internet infrastructure. The stewardship mechanisms of three resources, which were presented with a high level of compatibility to the others, are highly expected to function individually and collectively in a consistent manner, and to complete the coordination of the details with no problem.

ICG's call for proposal to each OC at the beginning of the consideration to leave the drafting of the proposal for respective resource offered unrepeatable opportunity for every member of OC, which has been developing the management policy of the respective resource and been proven its effectiveness, to consider the future shape of the stewardship of IANA function as one's own issue. We are convinced, the fact that the OCs have come back with very reasonable proposals both individually and associated with others means that the entire Internet Community has proved its effectiveness for self-governance even in this occasion of a dramatic change.

We congratulate all those who were involved and engaged in the development of this proposal in ICG and all OCs for this outcome.