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Submission ID: 91

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?

NO. The current version of the combined proposal is not complete yet especially regarding that the response from the names community lacks of the indispensible accountability section. Basically, the combined proposal has included sufficient detail to be evaluated against the NTIA criteria, however, if more details added in the implementation section, the proposal would be more complete and convincible. For example, on the issue of how the three operational communities is going to interact with PTI, till now the names community has stated clearly that PTI will be the IFO for the names community whereas the other two operational communities have not given specific stance on this issue, although ICG indicates they can contract with ICANN and then choose to subcontract with PTI, it is still necessary for them to clarify their relations with PTI. Other than this, it still needs more words to explain on how Verisign will be involved in the implementation phase, though this issue will not have direct impact on the transition process, it is supposed to be made clear before the combined proposal is put into implementation.

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?

Not yet. There is still an outstanding disputed issue to be solved, which is the intellectual property issue of IANA trademark and its domain name. But it is noticed that ICANN board has stated their stance, hopefully with coordination among the operational communities, there will be no conflict on this issue.

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?

Generally each operational community has included properly designed accountability mechanisms for running each part of the IANA functions, except that the names community still needs more interaction with CCWG to complete a whole proposal. On the other hand, obviously, in the combined proposal, each operational community has its unique accountability mechanism and with no overlaps at all, which raises awareness that the three IANA functions and related organizations could be separate extremely and no force to hold them together. Under the current condition as stated in the answer to Question 1, if the number resources community and the protocol parameters community opt to subcontract with PTI, PTI will officially become the IFO for the three IANA functions. Then

how to allocate the resources and personnel? How to respond if significant failures on operating one of IANA functions? Questions like these need more clarification.

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?

NOT SURE. In the combined proposal, all three operating communities propose its own structure to deal with part of the IANA functions, and all have its own accountability mechanisms. And the roles of stewards and IANA Function Operators (IFO) are not harmonized yet. In the names community proposal, ICANN carries out the role of steward and PTI is the IFO, whereas in the number resources community and the protocol parameters community proposals, IETF and RIR would be the stewards and ICANN would act as IFO. This arrangement would put ICANN in a very complicate position. Furthermore, if PTI becomes the actual IFO for all the functions and it does not perform well, theoretically it is possible to show up three individual IFOs to replace PTI. So in order to guarantee stability in operating IANA functions when organizational breach happens, it is suggested to ICG to carry out sufficient communication and coordination between the three communities and fully supplement the details on such significant issues.

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, compared with the status that NTIA as the steward of the IANA function, the proposal dramatically supports and enhances the multistakeholder model. Interests of multistakeholders are balanced in developing each operational community proposal and accountability mechanisms.

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.

NOT SURE, as stated in Question 3 and Question 4, there is a risk for the three IANA functions and organizations to be separated to a large extent. This may have impact on the stability of the DNS if there is no operational consistency between the undertakers of IFO.

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 a customer of the IANA services, this proposal has basically achieved a satisfactory status for global customers, but compared with some developed countries, customers in developing countries do not fully participate in this process, so in order to decide whether the combined proposal meet the needs and expectations of the global customers, it still needs to encourage the participation of customers from developing countries where more than half of Internet customers reside.

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 proposal maintains the openness of the Internet. Basically the IANA functions would be the operated mostly in the same way as before regarding policy making, and the operation of IANA registration management organization, ect.

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, the proposal clearly states the support of the multistakeholder model, and intends to have each stakeholder group equally participate in the whole process. The government sector has been treated just as one component of the all Internet 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.

In each section in the proposal, all seems to have provided evidence that their responses have meet NTIA criteria, nevertheless the proposal developing process has not reflect a sufficiently broad consensus. Since NTIA asked ICANN to convene "an inclusive, global discussion" to develop a proposal to transition the stewardship of IANA functions to the Global Multistakeholder Community, whereas ICANN itself has its own discrepancies in aware the globe of what ICANN is and not to mention ICANN is carrying out this IANA stewardship transition mission that has impact on all internet stakeholders, till now lots of stakeholders have not been involved in this process. This has not met the first NTIA criteria.

Suggestions: call for local governments and civil society's help to encourage the globe to involve in

this process and select representatives PROPORTIONAL to the quantity of netizens geographically, this may require ICG to extend the deadline for the public comment.

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

General Questions

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

Firstly, since ICANN would still involve a large part in IANA functions when the combined proposal is implemented, it is necessary for ICANN itself to become more globalized and call for more stakeholders to participate.

Secondly, the current jurisdiction settings for IANA functions does not accord with this global process, which US local LA law would not seem impartial to deal with it. Although this issue cannot be solved in a short time, it is recommended to try to consult to international law mechanisms and set it as a long goal to find an appropriate jurisdiction mechanism for this issue.