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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 proposal seems to satisfy NTIA criteria in terms of coherence of the different building blocks and processes around the specific operational communities involved.

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?

We are satisfied with the levels of compatibility and interoperability achieved to guarantee the unity of the proposal. In particular, the names community has continued to work in the refining of SLEs for IANA services once the NTIA is replaced, which is a crucial issue for registries.

We believe that there would need to be further refinements on the definitions of the IANA trademarks and the IANA domain name and the scope and remit of the IETF Trust for this purpose, but that ICANN's response to the subject satisfies the purpose for the transition and provides sufficient clarity for the operators in the new post-NTIA scenario.

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?

We would like to stress the importance for the names community on the current CCWG proposal to enhance and improve ICANN's accountability mechanisms. The ICG document reflects the relationship of the CWG proposal with the CCWG Accountability's work, which is still pending. We would like to see the conditions of the CWG being reflected into the final CCWG proposal.

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?

We do not envisage issues that would undermine the workability of the proposals of the integrated three operational communities. A subset of experts of the CWG has developed a proposal for

consideration of SLEs (27 Aug. 2015) which has received unanimous support from the working group and the IANA which is of extreme value to provide the necessary detail of services to the registries.

The IANA functions should retain the necessary human expertise and knowledge which it has shown to date in order to be able to coordinate and adequately address any issues which might emerge in the future (eg: due to a new protocol specification, etc) that would need to be pointed out to an affected operational community. This means that organizational intelligence of the IANA functions as an “organizational body” needs to be maintained.

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 proposal supports and enhances the multistakeholder model particularly when considering the CWG proposal and its relationship with the CCWG Accountability. We believe that the names community with the support of ICANN opened up a process which has incorporated the perspectives of other stakeholders which are not solely operational stakeholders. For this reason, we believe that the proposal supports and enhances the multistakeholder model and that explicit efforts were produced in the names community to effectively incorporate non-operational stakeholders into the process.

The outreach efforts deployed by the ICG, its open working mechanisms and online repository are all highly commendable activities that highlight the responsibility of this group and the commitment to multistakeholder processes.

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.

We believe that the current proposal does not challenge the DNS security, stability and resiliency, nor the excellent services provided by the IANA.

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.

LACTLD is not a direct customer of IANA services as it is a collective body representing the interests of ccTLDs in Latin America and the Caribbean who are direct customers of the IANA. With its

specific role and remit, LACTLD would like to comment the following:

- a) LACTLD has not received complaints nor discomfort among its members with the CWG proposal, nor the ICG document, neither in its mailing lists, nor in a personal comment to its staff or board, nor in the several webinars/consultations* that the organization has held with its membership to discuss the issue;
- b) there is nearly a complete overlap of LACTLD's ccTLD members with the ccNSO membership, and during the ccNSO session at ICANN 53 the CWG proposal received full support. Thus we cannot say that this proposal is contrary to the interests of LACTLD members.

*In 2015 LACTLD organized two webinars (May and August) for its members and held one face-to-face meeting (May) to discuss the CWG proposal and the ICG proposal.

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 proposal maintains the openness of the Internet through its solid community processes and the checks and balances that are in place for each operational community.

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.

The proposed structure is not in any way providing an avenue for replacing multistakeholder mechanisms for inter-governmental solutions. The main reason for this is that governments are participating in these efforts on equal footing with other stakeholders from the technical, business, civil society and academic communities. In addition, nor the ICG nor the CCWG proposal signal in any way a government-lead organization.

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.

The proposal is significantly dependent on the existing organizational capabilities of the operational communities involved and the related organizations: IETF, RIRs, ICANN, TLDs etc. If these respective organizations are strengthened and a rich ecosystem (both in terms of diversity in composition and number of organizations and individuals is maintained) the NTIA criteria - will be sustained by the ecosystem.

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.

General Questions

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

It would be good to reflect more accurately three outstanding issues which the current version of the ICG document does not reflect accurately, particularly considering the ingoing developments of the discussions:

1. Incorporate the issue of the IANA IPRs with the language provided by ICANN in its communiqué on 16 August.
2. Incorporate as soon as the CCWG Accountability finishes its work a more thorough description of the CWG proposal with these new accountability mechanisms in place.
3. Make a reference to “SLE Working Group Report on Service Level Expectation for IANA Root Zone Management (Post-Transition)” (published on 27 August).