

Transition Plan and Security Plan

[SUBGROUP MEETING](#), 16 June 2020

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TOPIC 1: Transition Plan

- Article IX, Section 9.3 (a), (b), (c) (d): Transition Plan
- (a) Contractor shall develop and maintain, with ICANN input, a plan in place for transitioning the IANA Naming Function to a successor provider to ensure an orderly transition while maintaining continuity and security of operations, including in connection with the nonrenewal of this Contract and/or divestiture or other reorganization of PTI by ICANN as contemplated by ICANN’s Bylaws. The transition plan shall be submitted to ICANN and posted to the IANA Website within 18 months after the Effective Date. The plan shall thereafter be reviewed annually and updated as appropriate.*
 - (b) Contractor shall provide support and cooperation to ICANN, and to any successor provider of the IANA Naming Function, in order to effect an orderly, stable, secure and efficient transition of the performance of the IANA Naming Function.*
 - (c) Contractor agrees to be engaged in the transition plan and to provide appropriate transition staff and expertise to facilitate a stable and secure transition of the IANA Naming Function to a successor provider.*
 - (d) ICANN, in conjunction with the CSC as necessary, shall review the transition plan at least every five years.*

NTIA required a Transition Plan. Relatively short plan, showed different business assets that would have to be transitioned. The requirements for transitioning has dependence on the nature of the company being transition to – without more details you have to stay high level. Discuss data base dumps we would provide, but not much more detailed than that. Can’t give much more detail without knowing this. Would NOT transfer software as it is proprietary to ICANN and not subject to transfer.

Post IANA Stewardship: similar transition plan. We read it as we would transfer to ICANN who contracts PTI, and since ICANN owns the infra-structure so it would be PTI transferring ICANN's assets back to ICANN? Doesn't make much sense.

Amy: PTI has fulfilled this in ICANN's eye

Rick: Article VI section 9.3 a – c doesn't specify that transition is back to ICANN. Difference between handing back to ICANN for ICANN to run or for ICANN to transition to another 3rd party.

Kim: it says "successor provider" but that is unknown, so since ICANN contracts us it would be back to icann and ICANN to handle next step. ICANN provides so much that it is natural for them to take it back and manage another operator themselves. PTI would work with ICANN's chosen 3rd party by understanding their system so we could propose data format exchange and work collaboratively on a cut-over method.

Rick; as long as give data in well-defined format, that is your responsibility. Is it correct o say: Access to servers where data is, ICNN controls those servers, so ICANN has to grant access.

Kim: it is under our control from business level but practical sense we are subcontracts operating on ICANN servers. ICANN always has access to data and free to transfer to whoever they see fit. PTI has indirect control under terms of service agreement.

Rick: without knowing 3rd party, it is difficult to get to details.

Fred: all circumstances around a separation; PTI is fully owned subsidiary of ICANN. Reason for legal separation was just due to community requests to solve past political hurtles. Must read contract with this in mind. So we don't have detailed plan as we lack concrete situation to do that. We have a sketch of how to do it. Legal separation of ICANN/PTI is to give some comfort to the community. Needing this Transition plan is highly unlikely.

Kim: this shouldn't be confidential – contract says it should be posted to web but hasn't been. We question the utility of the plan for reasons stated above. Will discuss with Legal dept about publishing it. We may want to preface it to explain why it is high level if published.

1. Acknowledge that specifics of transfer gets done when we know 3rd party.
2. Could be specific and details and describe an escrow format- how data will be structured (without knowing the 3rd party and the 3rd party's systems)

Fred: contract doesn't specify detail required, so you could post a high-level one.

Kim: annual reviews does audit the Transition Plan already: we have to review it internally and then show our meeting minutes to the auditor as proof we reviewed it.

TOPIC 2: Security Plan

Article XI, Sections 11.4 – 11.5 Security Plan, Director of Security

Section 11.4 Security Plan. ICANN shall coordinate with Contractor to develop and execute a security plan that meets the requirements of this Contract and this ARTICLE XI. ICANN and Contractor shall document in the security plan the process used to ensure information systems including hardware, software, applications, and general support systems have effective security safeguards, which have been implemented, planned for, and documented. Contractor shall, in coordination with ICANN, perform periodic reviews of the security plan and update the plan as necessary.

Section 11.5 Director of Security. Contractor's Director of Security shall be responsible for ensuring Contractor's compliance with the technical and physical security measures and

Kim- the security plan is maintained by ICANN Engineering & IT – wholistic plan for all of ICANN, including provisions for PTI. Reviewed as part of audit as well. Security plan tested against outcomes lined up in soc2 audit: example- lifecycle plan of trusted individuals

Kim-SOC2 is done on support systems for PTI. ICANN does not do SOC2 on other ICANN systems. For PTI security procedures are reviewed annually internally then provided proof to auditors that we did annual requirements. ICANN's security plan has things like password management policies, system configuration policies, procedures that fulfill the security plan password management policies and system configuration policies. Etc.

We have a separation of duties policies to ensure that developers do not have production access to all of our systems. All deployment of software needs to be gated with a with a deployment ticket and then you know system administrators take code that's been developed. Then it's put into production but no directly by the developers.....these are levels of control

Rick: documentation on periodic reviews of security plan.

Kim: Yes, it is an audit control but need to check specifics. IT steering committee's remit to approve ICANN's Security Plan annually.

Rick: Proxy for review is if you do updates- because you wouldn't update without a review

Kim: Change log for document. Document isn't static as requirements might shift.

Kim: to prove this to you we could set up a meeting with you and IT; show you update logs; show third party audit assertions on security;

