1. Do you believe that the transition from the NTIA should happen (Please provide the reasons for your answer)?

We believe this is something the ccTLD community has been pushing for over a decade and look forward to further contributing to a proposal that should be kept simple, concrete and, most of all, should guarantee secure and reliable services to all the IANA customers.

2. Are you comfortable with ICANN as policy-maker also being the IANA operator without the benefit of external oversight?

We recommend the policy function to be kept separate from the operational function. However, we believe that any function must foresee accountability mechanisms to ensure the reliability and quality of the functions.

3. Should registries, as the primary customers of the IANA functions, have more of a say as to which transition proposal is acceptable?

As primary customers of the IANA functions, the registries should be directly involved and eventually, more engaged in any transition proposal. We fear that few of the ccTLD managers are participating proactively in this process.

4. What does functional separation of IANA from ICANN mean to you? (this is not referring to having another operator than ICANN performing the IANA functions but rather the internal separation between ICANN and IANA in the context where ICANN is the IANA operator)

Functional separation is a requirement under the NTIA contract. We believe that a true functional separation would mean reporting to the community as a separate entity with a separate strategy, operating plan and budget, service levels, staff.

5. Do you believe the IANA function is adequately separated from ICANN under the current arrangements (internal separation)?

We believe that the IANA function could be further separated under the current arrangements.

6. In considering the key factors (such as security and stability, ease of separating the IANA function from ICANN, quality of services, accountability mechanisms etc.) for evaluating the various transition proposals what importance would you give to the ability to separate IANA from ICANN (separability) vs. the other factors?

We acknowledge that there are multiple factors to be taken into careful consideration, and that all pros and cons should be duly evaluated in order not to underestimate the consequences of decisions made without being pondered.

7. Given the IANA functions could be separated from ICANN do you believe it would be important for the community to obtain from ICANN on an annual basis the costs for operating IANA including overhead costs?

This has been a long-term request of the ccTLD community and we were only recently given more precise data about IANA costs. However, there are still grey areas relating to IANA costs due to the
lack of clear separation. Having the full and clear picture of these costs will help the community to have a better understanding of the resources needed to manage the IANA function properly and according to the highest service standards.

- **Would it be important to separate out the costs associated with address and protocol functions?**

  We are not able to assess the usefulness of this separation.

8. **Could there be unforeseen impacts relative to selecting a new operator for the IANA functions vs the ICANN policy role (should ICANN determine that there will be another round of new gTLDs, how could it ensure that the new operator would accept this)?**

  We believe that one key element of a possible separation is to make sure there is a process in place that ensures that the new operator enforces the policies decided by ICANN (e.g. including the launch of new TLDs) as far as these policies continue to be based on the multistakeholder and bottom-up approach. In any case, we highly recommend a proper risk assessment to make sure any possible contingency and/or deadlock are adequately managed and sorted out in a timely manner in the ultimate interest of guaranteeing quality services and responsiveness.

9. **Are there other transition models which the CWG should be exploring?**

   The focus should be on current transition before looking into other transition areas.