

Although the short window prior to the CWG-IANA call this week has closed, we write to provide our input for ongoing IPC consideration on the questions posed within the discussion document.

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

Yes, provided that ICANN retain the IANA functions and ICANN performs its responsibilities while remaining accountable to the multistakeholder community.

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

Accountability vis-à-vis external oversight should be addressed within the CWG-Accountability. To this end, an external contracting company is not necessary as part of the IANA stewardship transition, in particular because the IANA functions work well at present.

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

The entire community should have an equal say with respect to CWG-Accountability. We are indifferent on the subject with respect to CWG-IANA, provided that the proposal does not create any venues to re-litigate decided policy matters.

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)

The IANA functions contract stipulates the separation of ICANN policy development from the staff designated for IANA functions operations. Ultimately, based on current operational stability of the IANA functions under ICANN, we feel it appropriate for both policy and operations being housed within the same organization.

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

Yes, see the above response.

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 would assign it a low priority, and assign accountability mechanisms the highest priority.

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

Assuming *arguendo* that separation is desirable, line item overhead costs pertaining to the IANA functions would be an obvious necessity.

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)?

Separation could have an immediate destabilizing impact. It could create a power struggle with any newly created entities, potentially subject to capture. And it could also create unnecessary complexity in performing the IANA functions.

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

Just the internal models that do not fabricate external oversight through any newly formed or untested entity.