Dear Grace,

If I understand correctly, I can send to you comments that you will transmit to CWG-Stewardship. I refer to the discussion document for ICANN52 in Singapore, which was attached to the E-Mail at:

http://mm.icann.org/pipermail/cwg-stewardship/2015-February/001669.htm

That document poses some questions, for which I provide my responses below.

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

A: Only if adequate separation and accountability are in place. I associate with the comments made by Jordan Carter at:

http://mm.icann.org/pipermail/cwg-stewardship/2015-February/001685.htm

And with the comments made by Milton Mueller at:

http://mm.icann.org/pipermail/cwg-stewardship/2015-February/001779.htm

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

A: No. Again, I associate with the comments cited above, and I refer to the JNC submission at:

http://forum.icann.org/lists/icg-forum/msg00009.html

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

A: Yes, for what concerns names. See the JNC submission cited above.

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)

A: I'm not convinced that functional separation is possible under the existing ICANN Bylaws. However, the "Contract Co." approach could
>result in appropriate functional separation if it is correctly
>implemented, for example if Contract Co. is a Swiss non-profit
>association with appropriate membership.
>
>5. Do you believe the IANA function is adequately separated from ICANN
>under the current arrangements (internal separation)?
>
>A: Yes, because of the role of NTIA and the existing IANA functions
>contract. An external oversight role must persist after the transition.
>
>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?
>
>A: Separability is the key factor.
>
>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?
>
>A: Yes.
>
>Would it be important to separate out the costs associated with
>address and protocol functions?
>
>A: Yes.
>
>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)?
>
>A: If the post-transition legal and contractual framework is correct,
>there would be no unforeseen impacts. The new IANA operator would
>faithfully implement ICANN's policy decisions as it does now.
>
>9. Are there other transition models which the CWG should be exploring?
>
>I refer to the JNC submission cited under question 2 above.
>
>Thanks and best,

Richard