

>Dear Grace,

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>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:

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

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

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

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

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

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>And with the comments made by Milton Mueller at:

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

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

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

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

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

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

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>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)

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>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.

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

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>A: Yes, because of the role of NTIA and the existing IANA functions
>contract. An external oversight role must persist after the transition.

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>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?

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>A: Separability is the key factor.

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>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?

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>A: Yes.

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

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>A: Yes.

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>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)?

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>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.

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

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>I refer to the JNC submission cited under question 2 above.

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>Thanks and best,

>Richard