| **#** | **Who / Affiliation** | **General Direction (supportive of the mechanism or not) / Suggested Changes** | **Concerns/ considerations/ rationale/ new issues** | **CWG-Stewardship Response (which may include new information as a result of the continued discussions) / Recommended action** |
| --- | --- | --- | --- | --- |
| **246.** | AFRALO | Suggestion for alternative escalation path | We are concerned about the escalation path of the CSC as currently proposed and we suggest that CSC escalates to PTI Board who may ask for a review (from the IFR) or any other action they judge appropriate than the “direct customers” of IANA | ***The CWG-Stewardship appreciates your feedback and will factor this into its subsequent deliberations.***  ***Action: CWG-Stewardship (DT-M/DT-C) to consider alternative escalation path.*** |
| **255.** | Centre for Democracy & Technology | Concerns re. step 3 of problem management and lack of detail | We have some concerns that Problem Management step 3 on page 68 - where it is suggested that the CSC escalates to the ccNSO/GNSO - is adding a layer of escalation that may not be necessary. If requests for remedial actions are not being addressed by the IANA functions operator then there is, one must accept, a breakdown in the relationship and trust between the customers and the IANA functions operator. If this is the case, and remedy is not possible, it would seem appropriate for the CSC to call for a SIFR. A trusted relationship between the CSC and the IANA functions operator is absolutely essential to the stability, security and resiliency of the DNS.  Further, the lack of detail relating to how systemic problems will be addressed is concerning. We would suggest that systemic issues/problems should be subject to an SIFR and not just left to the 5 year IFR. Again, the stability, security and reliability of the DNS are paramount, and systemic problems - which are precisely the potential issues this stewardship framework is designed to address - must be dealt with as soon as they are identified. | ***The CWG-Stewardship appreciates your feedback and will factor this into its subsequent deliberations.***  ***Action: CWG-Stewardship (DT-M) to consider concerns re. step 3 and address lack of detail.*** |
| **256.** | NCSG | Concerned about inconsistencies and lack of detail | While we agree that the CSC should address issues of concern related to performance directly with the IFO, there may be inconsistencies between the review processes related to the CSC and its responsibilities and the IFR. According to the consultation document p. 58 “in the event that a material change in the IANA naming services or operations would be beneficial, the CSC reserves the right to call for a community consultation…” seems to be duplicative of the IFR and in particular the special review that is a component of the IFR. In addition the proposed CSC consultation process seems at odds with the IFR in that any result of the consultation would be approved by the ccNSO and RySG, a much smaller subset of the community than involved in an IFR. Our preference would be for any such material changes be reviewed as a part of the IFR special review process.  The process for addressing “systemic problems” on p 68 needs to be further elaborated as this is a key part of any escalation process. While it may be convenient to footnote to “IRP and CCWG Accountability WS 1 mechanisms”, filling this escalation gap with a fully spelled out and credible community based process that is proven and effective will be essential prior to the finalization of the proposal. | ***The CWG-Stewardship appreciates your feedback and will factor this into its subsequent deliberations.***  ***Action: CWG-Stewardship (DT-M) to review suggested inconsistencies and address lack of detail.*** |