Comments on "2nd Draft Proposal of the Cross Community Working Group to Develop an IANA Stewardship Transition Proposal on Naming Related Functions"

19 May 2015

Overall Review

First of all, we would like to express the sincere thanks to CWG members for producing this report. As to IANA Stewardship Transition, we consider that the most important principle is to ensure the policy-making transparency during the whole process, as well as the independency of operating mechanism and process management. We hope that through functional separation, the transition work can be completed as scheduled.

Specific Comments

1. The proposal shall make sure that the policy-making and operation management functions of IANA be separated. According to the current proposal, a new legal entity (Post-transition IANA, PTI) will carry out the day-to-day operation of IANA, while policy-making and decision-making responsibilities still be taken by ICANN. The relationship between ICANN and PTI will require scientific and effective regulations to prevent the interplay of operation and decision-making. Most importantly, under a check and balance system, the concentration of power and conflict of interests can be avoided, the risk that the root zone file be modified by a unilateral decision can be reduced as well.

2. The proposal shall be more specific on the operation mechanism and accountability system of IANA functions, so as to increase the transparency of IANA

policy-making, operating management, decision-making and financial process. The accountability and transparency of the root zone management will encourage more countries and multistakeholders to take an active part in global Internet governance and cooperation. Besides, while processing the ICANN accountability discussions, we hope that CCWG fully consider the existing mechanism, such as the work of ATRT and ATRT-2. Discussing the necessity of new mechanism and strengthening the existing ones can help prevent redundancy and low efficiency caused by function-overlapping. Even if a new accountability mechanism is decided to be set up (just like IFRT), its independence from the current ICANN need to be secured still.

3. We noticed that the current proposal lacks the description of the relationship among ICANN, PTI and Verisign in the post-transition root zone management architecture. Thus, the CWG should be urged to clarify the relationship among the parties as soon as possible. The root zone management system should be made more transparent, and the powers and responsibilities should be more decentralized.

4. We concerns about the inconsistency which will probably occur during the integration of the three proposals put forward by the three operational communities, namely, the naming, number and protocol communities. We expect that the three communities come up with a unified and feasible proposal under the coordination of ICG.

5. The proposal should fully embody the principle of geographic diversity. Particularly, when it comes the member composition of the new mechanism and the relevant election method, it shall ensure the geographic diversity so that developing countries and communities are able to have equal participating opportunities.