In submitting these comments the RySG and RrSG would like to highlight a number of points related to the IANA Transition Proposal:

- It should be recognized and understood that the IANA Stewardship Transition is taking place because the NTIA is comfortable with the current performance by the IANA Functions Operator, namely ICANN.
- NTIA is also confident that ICANN will continue to perform the IANA function adequately even in the absence of its oversight role
- The RySG and RrSG believe that the current level of service provided by IANA is satisfactory.
- The creation of the PTI should not in any substantive way change the day-to-day operations of the existing IANA Department.
- Service Level Expectations must be agreed with IANA and the Root Zone Maintainer prior to transition.
- ICANN should be responsible for funding the IANA function in the event the IANA function become separated from ICANN

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
1	*Please provide your name:*	Paul Diaz
2	*Please provide your affiliation*	gTLD Registries Stakeholder Group (RySG) and gTLD Registrars Stakeholder Group (RrSG)
3	*Are you providing input on behalf of another entity (e.g. organization, company, government)?*	Yes
4	*If you answered 'yes' to the previous question, please list the entity on whose behalf you are submitting these questions:*	GNSO Contracted Party House (RySG + RrSG)
	General Comments	

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
5	*If you have any general comments you would like to provide on the CWG-Stewardship Proposal, please provide these here.*	As direct customers of IANA the RySG reiterates previous comments that the current level of service provided by IANA is satisfactory. We believe that considerable improvements have been made to the provision of IANA services over the last few years as a result of IANA's interactions with ccTLD registry operators and also as a result of meeting the expectations of the NTIA as set out in the IANA Functions Contract. Registry operators along with root server operators are the primary customers of IANA's naming services and have a vested interest in a proposal that does not compromise the level of service that is provided under the current arrangement. As direct customers of gTLD and ccTLD Registries, Registrars have an indirect relationship with IANA. For this reason, the interests of Registrars and the RrSG will mirror those outlined by the RySG. In particular, registrars share the registries' expectation that post-transition IANA will meet or exceed the service levels that we and our customers have come to expect. The removal of NTIA from its oversight role does create a vacuum. We believe that this proposal, when complete, has the potential to fill the void. Notwithstanding, there are a number of elements of this proposal, outlined in subsequent sections, that we believe require further work and development before the Naming Proposal can be finalized. We are confident that with these issues resolved the Proposal will provide for a continuation of reliable and satisfactory IANA service. Additionally, we acknowledge that some elements of this proposal are reliant upon the outcome of Work Stream 1 of the CCWG on Enhancing ICANN Accountability, and that it may be necessary to review and possibly revise the proposal if some tenants, such as the Fundamental Bylaw provision or efforts to empower the ICANN Community, are not considered viable. The proposal would benefit from a high-level summary, as well as from diagrams that represent the many moving parts of the proposal to provide a complete picture. Sequencing of events is difficult to understand and some information is duplicated in different sections which creates confusion about who is responsible. Lack of clarity about the role and function of the PTI and its Board, also leaves many questions unanswered.
	Section I: The Community's Use of IANA	

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
6	*Do you have any specific comments or input you would like to provide with regards to section I - The Community's Use of the IANA? Section I lists the specific, distinct IANA services or activities the naming community relies on. If so, please provide your comments here*	We reiterate our previous statements pertaining to the management of the IANA functions. It is the position of the community of gTLD Registry Operators and their Registrar customers that the current operational performance of the IANA naming functions is satisfactorily maintained. The IANA functions are not broken. It should also be recognized and understood that the IANA Stewardship Transition is taking place because the NTIA is comfortable that current performance by the IANA Functions Operator can continue, even in the absence of its oversight role.
	Section II - Existing Pre-Transition Arrangements	
7	*Do you have any specific comments or input you would like to provide with regards to section II - Existing Pre-Transition Arrangements? This section describes how existing IANA-related arrangements work, prior to the transition. If so, please provide your comments here*	While we support the goal of brevity and understand why much of the proposal has been consolidated to the annexes, we believe that section II.A.ii.b should specifically refer to the Generic Names Supporting Organization as the policy development body for gTLDs. Likewise, we believe that Section II.A.ii.c would benefit from a high-level description of the review and redress mechanisms that are available to gTLD operators under the ICANN model. In general, we believe that providing context for the various links cited in the Proposal would improve flow and facilitate review, particularly by parties interested in the IANA Stewardship Transition that are new to ICANN participation.
	Section III - Proposed Post-Transition Oversight and Accountability	
8	*Do you have any specific comments or input you would like to provide with regards to section III.A - Elements of this Proposal? This section describes in short the main elements of the proposed post-transition oversight and accountability. If so, please provide your comments here.*	No. Comments on these elements will be addressed below in the specific sections to which they apply.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
9	*Do you have any specific comments or input you would like to provide with regards to section III.A.i - Proposed Post-Transition Structure. This section provides an overview of the different elements of the proposed post-transition structure. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	No. Comments on these proposal structures will be addressed below in the specific sections to which they apply.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
10	*Do you have any specific comments or input you would like to provide with regards to section III.A.i.a. - Post-Transition IANA (PTI). This section describes the proposed post-transition IANA. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	For all intents and purposes the PTI has the appearance of maintaining the status quo, in that the IANA Department will continue to provide existing services, albeit as an 'affiliate' of ICANN and as such a separate legal entity. It will also enable the continuation of the IANA functions contract, with ICANN replacing NTIA as the contractor, and PTI effectively becoming the IANA functions operator. The creation of PTI should satisfy the requirement for formal separation of policy from IANA and provide transparency as it relates to the cost of providing the IANA service which to date has never been achieved. It is important that the creation of the affiliate is not in any way detrimental to IANA staff in terms of their current conditions of service or create an environment of uncertainty. Current staff members have considerable expertise in the management of the IANA function and it will be important that the changed arrangements do not impact negatively on staff and resulting in turnover and subsequently compromising IANA services. Similarly, the day to day operation of the IANA Department should not change in any substantive way as a result of the creation of the PTI and to the extent possible it should be 'business as usual'. We believe it is critical that ICANN consistently and transparently provide funding and administrative resources to PTI as it is part of ICANN's core mission. The funding of PTI should never be compromised in favour of other projects. Currently the gTLD registry operators, gTLD registrars and most ccTLD operators pay fees to ICANN that constitute ICANN's primary revenue stream, which is used to support the IANA naming functions, as well as other ICANN projects. To ensure the continued funding of the PTI we believe that a set percentage of registry fees should be earmarked for the performance of the IANA naming functions. In the event of the separation of the IANA naming function from ICANN, the funding for a new entity performing the IANA naming function would continue to be paid by ICANN from the earmarked registry and registrar fees. This would ensure continuity of service and the security and stability of the domain name system.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
11	*Do you have any specific comments or input you would like to provide with regards to section III.A.i.b. - Post-Transition IANA Board. This section describes the proposed Board for the post-transition IANA. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	The role and the function of the PTI Board are not adequately defined in the proposal. We believe it is important to have a clear understanding of the role and function in order to be able to populate the PTI Board. It is our view that the role of the PTI Board should be very limited and pertain to responsibilities associated with the management of the IANA Functions Operation. It is our understanding that the creation of the 'affiliate' will not impact the current organizational structure of ICANN; however, it would be useful to understand how this works in practice and the impact this may or may not have on the PTI Board. It would also be useful to understand the relationship between the ICANN Board and the PTI Board. The RySG and RrSG consider that the PTI Board should be no more than five members, given our strong preference for the PTI Board having a very limited roles and responsibilities consistent with maintaining the current day-to-day operation of the IANA Department. The composition of the PTI Board should be confined to this limited role and function and directors should be appointed accordingly. Given this narrow role, we would be comfortable with the PTI Board being drawn primarily from the existing ICANN staff responsible for the management of the IANA Department and one or two members of the ICANN Board. We believe that this composition would be consistent with an 'insider' board as discussed during CWG calls in the event that the PTI is a Public Benefit Corporation in California[1]. We do not believe that the PTI Board is where broad community representation is necessary or appropriate as we do not believe the day-to-day operation of the PTI should be open to interference from external influences. . We are concerned about potential expansion in the role of the PTI Board. A provision in the "fundamental bylaws" could explicitly limit this role and potential overlap with responsibilities that fall properly within ICANN; alternatively founding documents for the PTI could clearly define this narrow remit. We also suggest development of a list of things that are beyond the remit of the PTI Board in the "fundamental bylaw." For instance, PTI Board cannot contract back its functions to ICANN or get involved in policy making undertaken by ICANN.

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[1] https://community.icann.org/download/attachments/52891634/Memorandum%20-%20Post-Transition%20IANA%20Board%20Stress%20Tests_13May.pdf?version=1&modificationDate=1431893980000&api=v2.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
12	*Do you have any specific comments or input you would like to provide with regards to section III.A.i.c. - IANA Statement of Work. This section describes the proposed IANA Statement of Work, including proposed carryover provisions. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	We regard the existence of a contract including a statement of work between IANA and PTI as an advantage of the proposed affiliate model and support all of the identified carryover provisions being incorporated into the statement of work. We believe that this section would also benefit from a list of additional items to be incorporated into the statement of work that do not exist under the current contract between the NTIA and ICANN, such as the requirement to conduct the regularly-scheduled IANA Function Reviews. For clarity, the statement of work should also acknowledge the role of the CSC in monitoring IANA's performance in accordance with service level targets as well as the relationship between the CSC, ICANN and PTI.
13	*Do you have any specific comments or input you would like to provide with regards to section III.A.i.d. - IANA Function Review. This section describes the proposed periodic as well as special review of the IANA Function. If so, please provide your comments here. (Note that these comments cover item 32, Annex F.) If applicable, please reference the sub-section your comment relates to.*	The RySG's initial comments stressed the need for the CWG to streamline the IANA oversight mechanisms and to avoid creating extra governance structures to oversee the IANA functions that would unnecessarily complicate what is a simple, technical process. In that vein, we support the revisions made to the second draft report. We would generally like to offer support for the construct of the review team and its process. We will provide more specific feedback as it pertains to the full proposal for the creation of an IANA review team in our response to Question 32

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
14	*Do you have any specific comments or input you would like to provide with regards to section III.A.ii.a. - Customer Standing Committee (CSC). This section describes Customer Standing Committee that is expected to oversee performance of the IANA Functions as they relate to naming services. If so, please provide your comments here.*	The RySG and RrSG support the recommendations in this section including the CSC charter in annex G (item 33). The RySG and RrSG are firmly of the view that the narrow remit of the CSC be maintained and that the composition of the CSC not be increased. Monitoring the performance of IANA will be an important role in a post-transition environment and we believe that the CSC should not be distracted unnecessarily with other tasks
15	*Do you have any specific comments or input you would like to provide with regards to section III.A.ii.b. - Service Level Expectations. This section describes the proposed service level expectations post-transition. If so, please provide your comments here. (Note that these comments cover item 34, Annex H.) If applicable, please reference the sub-section your comment relates to.*	At the time of submitting these comments the Service Level Expectations being developed by Design Team A were not available; however, we make the following observations. The SLEs included in the proposal must be agreed with IANA and the Root Zone Maintainer. We reiterate that current level of service provided by IANA is satisfactory and we do not believe there is any reason to jeopardise that level of service immediately following transition by setting service levels that may not be attainable. We note that there is provision within the CSC Charter to review the SLEs every 12 months, and will also be reviewed as part of the reviews conducted by the IANA Functions Review Team.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
16	*Do you have any specific comments or input you would like to provide with regards to section III.A.ii.c. - Escalation mechanisms. This section describes the different proposed escalation mechanisms as they relate to the naming services.* *If so, please provide your comments here (Note that these comments 35 (Annex I), 36 (Annex J) & 37 (Annex K).cover the following items: 35 (Annex I), 36 (Annex J) & 37 (Annex K). If applicable, please reference the sub-section your comment relates to.*	Escalation is mentioned in a number of sections; the proposal would greatly benefit from a single description of how all the pieces fit together. We recognize and appreciate the fact that the CWG Design Team M is developing flow charts to more clearly illustrate the three escalation mechanisms proposed. We suggest that an additional diagram be added that shows how the three mechanisms fit together. Please see our comments for items *35 (Annex I), 36 (Annex J) & 37 (Annex K).*

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
17	*Do you have any specific comments or input you would like to provide with regards to section III.A.ii.d. - Separation review. This section describes the separation review that can be triggered by an IANA Function Review if needed. If so, please provide your comments here. (Note that these comments cover item 38, Annex L.) If applicable, please reference the sub-section your comment relates to.*	We support the defined escalation paths through which issues are first addressed through the CSC and then referred to the relevant supporting organizations before an emergency review or determination to separate is triggered. However, further details are needed around the separation mechanism itself, such as what conditions or issues would support the initiation of a separation review, what criteria would be assessed in evaluating potential successor operators, and the process by which the community would agree upon a successor operator. As an initial criterion we believe that the decision to initiate a separation review should only occur if it is supported by a majority of the direct customers of the IANA Naming Functions, namely ccTLD and gTLD registry operators. This would provide a check to ensure that the functions were not moved arbitrarily while its customers remained satisfied with IANA's performance. While it is true that a decision to separate would affect the whole community, registries, as direct customers of the IANA function, are disproportionately affected and any decision has the potential to affect the day-to-day business operation of registry operators, which in turn would affect all domain name registrants and Internet users. Additionally, we are concerned about the underrepresentation of registries in the proposed structure of the Cross Community Working Group that would be responsible for managing the separation process that followed a separation review. The current structure does not even guarantee a single appointment by a member of the gTLD registry community. As an alternative, we propose that a structure that is multi-stakeholder in composition but provides for some weighted representation by registries should be used.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
18	*Do you have any specific comments or input you would like to provide with regards to section III.A.ii.e. - Framework for transition to successor IANA Operator. This section describes the proposed framework for a transition to a successor IANA Operator to ensure continuity of operations. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	The high level framework for a transition proposes some solid, supportable principles. Specifically, we would like to support the following recommendations: • That a detailed transition plan be completed within 18 months; • That the transition be reviewed yearly, and that a comprehensive review be performed every 5 years; and • That the budget for the above be explicitly allocated While many key functions and procedures of the IFO are documented, we think it important that all processes are inventoried to ensure that there are no gaps. Lastly, prior to any transition, and perhaps as part of the regular reviews, effort should be undertaken to capture informal processes and institutional knowledge within the IFO. These details will help ensure a smooth transition process and ongoing improvement.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
19	*Do you have any specific comments or input you would like to provide with regards to section III.A.iii.a. - Proposed changes to root zone environment and relationship with root zone maintainer. This section describes the proposed changes to the root zone environment and the relationship with the Root Zone Maintainer.* *If so, please provide your comments here. (Note that these comments cover item 40, Annex N.) If applicable, please reference the sub-section your comment relates to.*	There is still uncertainty with regard to Root Zone management, since NTIA has done nothing to deal with its contract with VeriSign as the zone file maintainer. We request NTIA begin to deal with this work as soon as possible and communicate its plans to the CWG and ICG.
20	*Do you have any specific comments or input you would like to provide with regards to section III.A.iv.a. - ccTLD Delegation Appeals. This section describes the proposed recommendation in relation to a ccTLD delegation appeals mechanism. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	No

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
21	*Do you have any specific comments or input you would like to provide with regards to section III.A.iv.b. - IANA Budget. This section describes the recommendations in relation to the IANA Budget. If applicable, please reference the sub-section your comment relates to. If so, please provide your comments here.*	The RySG and RrSG support the recommendations in this section including item 43, Annex Q.
22	*Do you have any specific comments or input you would like to provide with regards to section III.A.iv.c. - Regulatory and legal obligations. This section describes the regulatory and legal obligations post-transition and how these are expected to be met. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	As SAC069 points out the difficulty in being able to obtain the necessary exemptions or waivers from the US Office of Foreign Asset Control (OFAC) is hard to assess. The IFO will almost certainly need to be able to interact with entities within jurisdictions under the OFAC purview and we would encourage the CWG to ensure that the necessary licenses will be available prior to the transition. The notion that a single license may be acquired to cover ICANN, the IFO and the RZM is supported and encouraged. We have some concern that without the NTIAs oversight, the obtaining of OFAC waivers may become more difficult and would encourage that this be determined as soon as is practicable.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
23	*Do you have any specific comments or input you would like to provide with regards to section III.B. - Implications for the interface between the IANA Functions and existing policy arrangements. This section describes the expected implications for the interface between the IANA Functions and existing policy arrangements as a result of the proposed transition arrangements. If applicable, please reference the sub-section your comment relates to. If so, please provide your comments here.*	The proposal seeks to retain the functional separation between the policy development process and the IANA Functions. The RrSG and RySG are both satisfied with the current IANA naming services and support the recommendation in this section. Maintaining functional separation is of the utmost importance to the integrity, stability and availability of the IANA Functions and ensures the IANA Functions will remain unimpeded by the policy development process.
	Section IV - Transition Implications	

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
24	*Do you have any specific comments or input you would like to provide with regards to section IV. - Transition Implications. This section is expected to describe the CWG-Stewardship views as the implications of the changes it proposed in Section III.* *If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	As this section is under development and in draft form, it is difficult to identify missing or incomplete implications. Additionally, the structure described in Section III is not yet finalized. Open questions such as those regarding the composition of the PTI board, the process of separation, and the legal structure of the PTI make it difficult to comment on implications with specificity. There are also several broad issues that may be missing from this section. These include the impact on community involvement, uncertainties about funding, the implications of the separation process, and the effects of the CCWG Accountability proposal. Subsection IV.D, which references timelines, does not mention the effects of possible delays created by CCWG Accountability or the receipt of workflows and process documents from IANA. We recommend adding further implications that capture the more recent iterations of the proposed post transition structure.
	Section V - NTIA Requirements	
25	*Do you have any specific comments or input you would like to provide with regards to section V. - NTIA Requirements. This section is expected to describe how the proposal community's proposal meets these requirements and how it responds to the global interest in the IANA functions. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	We believe that the proposal generally meets the four transition criteria posited by the NTIA as follows: *Support and Enhance the Multi-Stakeholder Model* As noted above, the IANA Stewardship transition marks the NTIA's confidence that ICANN and the multi-stakeholder model that underpins it have evolved and matured such that NTIA oversight over IANA is no longer necessary. We believe that transitioning the functions to ICANN and having performance oversight be carried out by IANA customers and other elements of the ICANN community, through the CSC and the IFRT, respectively, support and enhance the Multi-stakeholder model. *Maintain the security, stability, and resiliency of the Internet DNS* As noted above, we believe that the performance of the IANA functions is currently satisfactory. We hope that the continuity provided for within the draft proposal, wherein the functions remain within ICANN and operational requirements are carried over into a Statement of Work between ICANN and PTI will continue to provide for security, stability, and resiliency in the performance of the IANA Naming Functions and in the Internet DNS at large. We do note that in the event that sometime in the future, a decision is made to separate the IANA function from ICANN, due consideration must be given to ensuring that security and stability of the DNS is not compromised in any way.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
		Meet the needs and expectations of the global customers and partners of the IANA services
		In the Registries Stakeholder Group's comments on the previous iteration of the Naming Proposal we had noted that in proposing cumbersome oversight structures the proposal could put at risk the operational needs of registries in favor of giving all parties a seat at the table. In providing for leaner structures, and executing day-to-day performance monitoring through the CSC, a predominantly customer-led body, the current proposal addresses these needs of registries as direct customers of the IANA Functions. Likewise, the creation of a streamlined and regular review process will provide an opportunity to ensure that IANA continues to meet the needs of its customers, as well as the ICANN community at large, without the possibility of jeopardizing day-to-day performance of the naming functions. We remain concerned about the possibility that a broad scope of responsibility is assigned to the PTI board. If the PTI board were to be developed with a broad scope and/or large composition our previous concerns would likely resurface. We urge the CWG in scoping the PTI board to seek out an effective and minimalist mandate and composition, otherwise this criterion could be undercut.
		Maintain the Openness of the Internet
		Maintaining the openness of the Internet is inextricably tied to sustaining and supporting the multi-stakeholder structures that govern it. Though not an end in itself, we believe providing a multi-stakeholder, private-led solution to replace the NTIA oversight helps to maintain the openness of the Internet.
		The proposal must not replace the NTIA role with a government-led or an intern governmental organization solution
		The proposal does not suggest a government-led approach to the future oversight of the IANA Functions. Neither the CSC nor the IFRT are government-led bodies; instead, they are drawn from the customers of the IANA functions and from the ICANN community and are balanced in such a way that does not give government actors that participate in the ICANN multi-stakeholder model a larger role than other relevant stakeholders. We note that the fulfilling of this NTIA requirement will be dependent on the outcome of the CCWG Accountability recommendations.
	Section VI - Community Process	

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
26	*Do you have any specific comments or input you would like to provide with regards to section VI. - Community Process. This section is expected to describe This section should describe the process the community used for developing this proposal. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	We recognise that this section of the proposal will be completed toward the end of the process and hence reserve our comments until that happens.
	Annexes	
27	*Do you have any specific comments or input you would like to provide with regards to section Annex A - The Community's Use of the IANA - Additional Information. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	No

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
28	Do you have any specific comments or input you would like to provide with regards to section Annex B - Oversight mechanisms in the NTIA IANA Functions Contract. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.	No
29	*Do you have any specific comments or input you would like to provide with regards to section Annex C - Principles and criteria that should underpin decisions on the transition of NTIA Stewardship for names functions. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	The RySG and RrSG support the principles in this annex.
30	*Do you have any specific comments or input you would like to provide with regards to section Annex D - Xplane Diagram. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to*	No.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
31	*Do you have any specific comments or input you would like to provide with regards to section Annex E - IANA Contract provisions to be carried over post-transition. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	No.
32	*Do you have any specific comments or input you would like to provide with regards to section Annex F - IANA Function Reviews. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	As noted above we are generally supportive of the creation of the IANA Function Review Team (IFRT). Specifically, we support its creation as it allows for meaningful multistakeholder input into the overarching management of the functions while maintaining technical flexibility and day-to-day oversight by the direct customers of the IANA functions. While we would not support the creation of a standing committee or body to carry out these review functions, as currently drafted the IANA review team would be stood up every five years with members appointed from the various stakeholder groups and relevant technical liaisons. As such, instituting a review cycle of once every five years seems appropriate to not only unduly burden the community with review work while at the same time providing an effective review mechanism for the management of the IANA functions. However, it is critical that the IFRT remains open and transparent and limited in scope and remit to deal with concerns around mission creep, in order to mitigate the concerns we raised with the creation of the Multistakeholder Review Team in response to the previous CWG draft Proposal.
33	*Do you have any specific comments or input you would like to provide with regards to section Annex G - Proposed charter of the customer standing committee (CSC).*	The RySG and RrSG supports the recommended charter for the CSC as contained in this annex.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
34	*Do you have any specific comments or input you would like to provide with regards to section Annex H - Service level expectations. If so, please provide your comments here. See our comments for item 15. If applicable, please reference the sub-section your comment relates to.*	See our comments for item 15.
35	*Do you have any specific comments or input you would like to provide with regards to section Annex I - IANA Customer Service Complaint Resolution Process for Naming Related Functions. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to. See our comments for item 16.*	The RySG and RrSG support the proposed IANA Customer Service Complaint Resolution Process for Naming Related Functions with the understanding that the CWG is continuing to work on Phase 2 of this process. Please also see our comments on question 16 about escalation procedures generally.
36	*Do you have any specific comments or input you would like to provide with regards to section Annex J - IANA Problem Resolution Process (for IANA naming services only). If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	The RySG and RrSG support the proposed IANA Problem Resolution Process for IANA naming services with the understanding that elements of this process are still being developed by the CWG. Please also see our comments on question 16 about escalation procedures generally.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
37	*Do you have any specific comments or input you would like to provide with regards to section Annex K - Root Zone Emergency Process. If applicable, please reference the sub-section your comment relates to.* If so, please provide your comments here.	The RySG and RrSG support the proposed Root Zone Emergency Process. See our comments for item 16.
38	*Do you have any specific comments or input you would like to provide with regards to section Annex L - Separation Review. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	Please see our comments for item 17.
39	*Do you have any specific comments or input you would like to provide with regards to section Annex M - Framework for transition to a successor IANA operator. If applicable, please reference the sub-section your comment relates to. If so, please provide your comments here.*	Please see our comments for item 18.

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
40	*Do you have any specific comments or input you would like to provide with regards to section Annex N - Proposed changes to root zone environment and relationship with root zone maintainer. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	Please see our comments for item 19.
41	*Do you have any specific comments or input you would like to provide with regards to section Annex O - ccTLD Appeals Mechanism Background and Supporting Findings. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	No

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
42	*Do you have any specific comments or input you would like to provide with regards to section Annex P - IANA Operations Cost Analysis. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	The RySG and RrSG call attention to the following recommendations in the proposal: • Recommendation 2 in Section III.A.iv.a. (IANA Budget): "Future Fiscal Year (FY) ICANN Operating Plans & Budgets, and if possible even the FY16 ICANN Operating Plan & Budget, include at a minimum itemization of all IANA operations costs in the FY ICANN Operating Plan & Budget to the project level and below as needed." • Recommendation 3 in Annex Q: "A review of the projected IANA Stewardship Transition costs in the FY16 budget to ensure that there are adequate funds to address significant cost increases if needed to implement the transition plan without unduly impacting other areas of the budget." The RySG and RrSG recommend that future analyses similar to the one contained in Annex P for FY15 be done for the following as soon as feasible: ● FY16 Budget approved by the Board ● Approved FY16 Budget as modified to include recommendations from the CWG Stewardship and CCWG Accountability work stream 1 ● Future draft and final FY Budgets.
43	*Do you have any specific comments or input you would like to provide with regards to section Annex Q - IANA Budget. If so, please provide your comments here. If applicable, please reference the sub-section your comment relates to.*	See our comments for item 21.
	Other Comments	

Item #	Question	RYSG/RRSG COMMENTS ON IANA TRANSITION PROPOSAL
44	*Are there any other comments or issues you would like to raise for the consideration of the CWG-Stewardship?*	Legal Separation of the IANA Department could require backing of the other customer communities (IETF and RIRs) One issue that has not been addressed in the proposal to "ring-fence" ICANN's IANA department into a wholly-owned affiliate/subsidiary is whether this recommendation has the support of the other two IANA customer communities. Though the issue of separation of ICANN's policy-making responsibilities and technical role in operating IANA uniquely affects the naming community (as ICANN has no policy-related role for the numbering or protocol parameter communities) each of these communities is affected by the IANA department's performance of their respective functions. As such, these other communities are implicated in the decision to move the IANA department into the proposed new subsidiary, PTI, even if their agreements with ICANN would not necessarily change. Little has been done to socialize this recommendation with the other customer communities, and it is critical that this be recognized as a dependency in the existing proposal. While this work is likely to take place through the IANA Coordination Group, which oversees the development of the three respective proposals and will ultimately be tasked with integrating these proposals, we believe that it is advisable to inform and get support from these customer communities as soon as possible, whether they participate directly in PTI or not. We appreciate the fact that the numbering community communicated that it has no present problems with the naming proposal. Likewise, further consideration should be given to how separation would be carried out in the event that not all communities agreed that a transition of their functions was necessary.