

To the members of the Cross Community Working Group on  
Enhancing ICANN Accountability:

The Internet Architecture Board (IAB) wishes to comment specifically on the bylaws changes proposed in paragraphs 52-63 of the CCWG-Accountability Draft Report as posted at <https://www.icann.org/en/system/files/files/cwg-accountability-draft-proposal-with-annexes-04may15-en.pdf>.

While we feel that the principles embodied in the clarification suggested below are important, it is our understanding that all of the proposed bylaws changes are early drafts, and will require extensive community review and additional revision as the proposed bylaws changes move towards implementation. Broad discussion of all of the implications of new bylaws language, including the specific language below, will be necessary. In this light, our suggestions are offered as suggestions for further improvement over the initial draft.

We suggest a clarification to the following existing bylaws text in paragraph 56:

"The mission of The Internet Corporation for Assigned Names and Numbers ("ICANN") is to coordinate, at the overall level, the global Internet's systems of unique identifiers, and in particular to ensure the stable and secure operation of the Internet's unique identifier systems. In particular, ICANN:

1. Coordinates the allocation and assignment of the three sets of unique identifiers for the Internet, which are Domain names (forming a system referred to as "DNS"); Internet protocol ("IP") addresses and autonomous system ("AS") numbers; and Protocol port and parameter numbers.
2. Coordinates the operation and evolution of the DNS root name server system.
3. Coordinates policy development reasonably and appropriately related to these technical functions."

We believe the verb "coordinates" gives the wrong impression about ICANN's core function, particularly for those outside of the ICANN community who are not familiar with the ecosystem of entities involved in developing and managing policies and identifier assignments related to core Internet registries. Furthermore, since there are many sets of unique identifiers that ICANN is not involved in administering, it would be more accurate to use the term "core Internet registries" rather than referring to the Internet's unique identifier systems. We suggest the edited text below to make both of these points more clear:

"The mission of The Internet Corporation for Assigned Names and Numbers ("ICANN") is to support, at the overall level, core Internet registries, and in particular to ensure the stable and secure operation of those registries. In particular, ICANN:

1. Supports the allocation and assignment of values in three categories of registries as directed by the consensus processes in the responsible operational communities. These categories are Domain names (forming a system referred to as "DNS"); Internet

protocol ("IP") addresses and autonomous system ("AS") numbers;  
and Protocol parameters.

2. Supports the operation and evolution of the DNS root name  
server system.

3. Supports policy development reasonably and appropriately  
related to the DNS."

With these edits, we believe the paragraphs that further articulate  
ICANN's role (57-60) would not be necessary because item (1)  
circumscribes ICANN's mission to carrying out identifier allocation  
and assignment at the direction of the relevant communities. At the  
very least, it obviates the need for paragraph 59, which we view as  
unnecessarily constraining the relationship between the IETF and ICANN.  
That relationship has benefited from fluidity over the years and that  
characteristic should be preserved going forward.

On behalf of the IAB,  
Andrew Sullivan  
IAB Chair