

# IANA Stewardship Transition Proposal - Public Comment Form

*Disclaimer: The ICG will not use the information collected for any purpose other than analyzing public comments. Submitters' names, affiliations, and comments will be public.*

## Identifying Information

*\* Indicates required field*

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## Questions Concerning the Proposal as a Whole

- 1) Completeness and clarity: Is the combined proposal complete? Each of the operational community proposals contains aspects to be completed in the future when the proposal is implemented. Is the combined proposal specified in sufficient detail such that it can be evaluated against the NTIA criteria?

[Yes](#)

- 2) Compatibility and interoperability: Do the operational community proposals work together in a single proposal? Do they suggest any incompatible arrangements where compatibility appears to be required? Is the handling of any conflicting overlaps between the functions resolved in a workable manner?

[Pending arrangements to be made about Intellectual Property Issues around IANA and IANA.ORG, the ALAC believes that the proposals are compatible with each other.](#)

[The ALAC will support any mechanism which preserves the existing rights of the naming community and has the agreement of the three operational communities.](#)

[~~The ALAC notes that the ICANN Board has pointed to an amicable transfer of this Property to a third party, possibly a Trust.~~](#)

- 3) Accountability: Do the operational community proposals together include appropriate and properly supported independent accountability mechanisms for running the IANA functions? Are there any gaps in overall accountability under the single proposal?

The ALAC believes issues of operation accountability have been suitably addressed within the remit of the operational community mandates in developing their proposals.

[ Note that as in its response to Q6 on Stability, the ALAC has related concerns on the accountability mechanisms as they coordinate with each other in each of the operational communities.]

- 4) Workability: Do the results of any tests or evaluations of workability that were included in the operational community proposals conflict with each other or raise possible concerns when considered in combination?

The ALAC does not believe that there are conflicts ~~remaining~~ resulting from tests or evaluations of workability that were included in the operational community proposals.

### Questions Concerning NTIA Criteria

- 5) Do you believe the proposal supports and enhances the multistakeholder model? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.

The ALAC believes that the proposal supports the Multistakeholder model, ~~as long as the balance of stakeholders will be kept in the future. The ALAC warns against any particular stakeholder group exercising over-influence in future Multistakeholder policy development and asks that at all times decisions should be made to enhance the public interest.~~

- 6) Do you believe the proposal maintains the security, stability, and resiliency of the DNS? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.

The ALAC is particularly concerned about maintaining the security, stability and resiliency of the DNS as every single Internet End User around the world relies on a stable DNS for their Internet use.

A split resulting in IANA Functions being undertaken by more than one IANA Functions Operator would be likely to introduce instability. The ALAC therefore recommends that although no measures were introduced by the IANA Coordination Group to increase direct operational coordination between the Operational Communities, this should be promoted at Implementation Phase, with the aim to reduce the likelihood of a split in IANA Functions Operators. This direct operational coordination should take place as enhanced communication and continuous dialogue.

In the event of an Operational Community reaching the decision to replace their IANA Functions Operator, they should discuss their decision with other Operational Communities prior to

proceeding forward, seeking all ways to keep all of the IANA functions undertaken by a single IANA Functions Operator.

- 7) Do you believe the proposal meets the needs and expectations of the global customers and partners of the IANA services? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary. Please indicate if you are a customer or partner of the IANA services.

The ALAC believes that the proposal meets the needs and expectations of the global customers and partners of the IANA services. ] In the ALAC definition of “customer”, each and every Internet User is a customer due to their use of the DNS in their Internet-related activities. The ALAC reinforces its assertion that the Internet would not be the Internet without Internet users and the notion of a customer of the DNS is user-centric.]

(square brackets since there is a question on whether the definition of “customer” is as interpreted here)

- 8) Do you believe the proposal maintains the openness of the Internet? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.

The ALAC believes that the proposal indeed maintains the openness of the Internet by keeping the processes by which the IANA functions are performed as close as possible to the current operational status which, all parties agree, is more than satisfactory.~~status quo.~~

- 9) Do you have any concerns that the proposal is replacing NTIA's role with a government-led or inter-governmental organization solution? If yes, please explain why and what proposal modifications you believe are necessary. If not, please explain why.

The ALAC believes that the proposal is in no way replacing the NTIA's role with a government-led or inter-governmental organization solution.

- 10) Do you believe that the implementation of the proposal will continue to uphold the NTIA criteria in the future? If yes, please explain why. If not, please explain why and what proposal modifications you believe are necessary.

The ALAC does not foresee any divergence from the NTIA criteria in the future.

~~The ALAC believes that the proposal will maintain the operational status quo.~~

### **Questions Concerning ICG Report and Executive Summary**

- 11) Do you believe the ICG report and executive summary accurately reflect all necessary aspects of the overall proposal? If not, please explain what modifications you believe are necessary.

Yes.

### **General Questions**

- 12) Do you have any general comments for the ICG about the proposal?