

4 December 2025

Greg Shatan, Hans Petter Holen, and Russ Housley
IANA IPR Community Coordination Group Chairs

Re: ALAC Position on the Proposed Amendment to IETF IPMC Bylaws



Dear Greg, Hans Petter, and Russ,

On 02 October 2025, the IETF Intellectual Property Management Corporation (IPMC) Directors opened a public consultation period on the [Proposed Amendment to IETF IPMC Bylaws](#). The At-Large Consolidated Policy Working Group reviewed the Proposed Amendment to IETF IPMC Bylaws and decided it would be in the interest of end users to write a letter to the IANA IPR CCG and explain the ALAC position on the Proposed Amendment to IETF IPMC Bylaws. Please find the ALAC comments below and consider sharing them with the IPMC Directors (trustees@ietf.org) as appropriate.

1. The ICANN At Large Advisory Committee (ALAC) supports the revision of the IETF IPMC Bylaws as posted to the [IETF IPMC website](#), subject to the IANA IPR Community Coordination Group (CCG) as a whole, as well as the IETF IPMC Directors (IETF Trustees) and their appointing bodies, agreeing to the same text.

Accordingly, the ALAC supports the transfer of the IANA IPRs and the assignment of related licenses and other agreements from the IETF Trust to the IPMC.

The ALAC notes that there are numerous other issues with these Bylaws as currently drafted, which have been brought to the attention of the IETF IPMC by the CCG or members of the CCG. While these issues do not need to be resolved prior to the completion of the transfer of the IANA IPRs and related agreements, the ALAC strongly encourages the IETF IPMC to amend the Bylaws to resolve these issues expeditiously after the completion of the transfer in order to ensure that the governance of the IETF IPMC under the Bylaws is as clear and unambiguous as possible.

On a related note, the ALAC supports the request by the IETF Administration LLC (on the IETF's [tlp-interest email list](#)) to remove Section 4.1 of the Bylaws; the references to "Beneficiary" and "Settlors," as well as the succession mechanism set out in Section 4.1, as they are inappropriate for these corporate bylaws and could have unintended consequences. The ALAC notes, however, that this deletion would require other changes to the Bylaws (e.g., relating to other references to Beneficiary and Settlor), underlining the ALAC's recommendation that the remaining issues with the Bylaws be resolved as soon as possible.

2. The ALAC wishes to note its disappointment with the manner in which this matter has been handled at certain points during the past two years. Specifically, the failure to communicate

with and get approval from the CCG before the IANA IPR was assigned from the Trust to the IPMC was regrettable. This was compounded by the failure of the Trust to ensure that it thereafter had rights to the IANA IPRs sufficient to support its ongoing licenses of the IANA IPR to ICANN. The shortcomings of the IETF IPMC Bylaws as originally drafted (and only partially resolved by the pending amendments) were unfortunately consistent with these earlier missteps. In retrospect, it has also become clear that the Trust should have consulted the CCG before the creation of the IPMC itself, when the plan to transfer and “re-house” the IANA IPR was first being considered.

Sincerely,

Jonathan Zuck,
Chair, At-Large Advisory Committee (ALAC)