

[comments-cwg-naming-transition-01dec14]

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Comments from ARI Registry Services

- *To:* "comments-cwg-naming-transition-01dec14@xxxxxxxxx" <comments-cwg-naming-transition-01dec14@xxxxxxxxx>
- *Subject:* Comments from ARI Registry Services
- *From:* Donna Austin <Donna.Austin@xxxxxxxxxxxxxxxx>
- *Date:* Mon, 22 Dec 2014 16:08:04 +0000

ARI Registry Services thanks the CWG for their work undertaken to date on developing a proposal to transition the NTIA oversight and stewardship role as it relates to the IANA function.

We do not seek to provide specific comments on the proposal as we largely support the comments provided by the Registry Stakeholder Group. However, we would like to provide input in the form of principles that we consider important in this exercise. These principles are provided below in no particular order of importance.

* The role performed by the IANA Department is largely technical and operational. The role performed by the IANA Department should not be conflated with ICANN's role as a policy development body.

* Operational stability and reliability of the IANA function is imperative to the business operations of registry operators.

* One of the four principles identified in the NTIA announcement is: Meet the needs and expectation of the global customers and partners of the IANA services; and this should be a primary consideration of the development of a transition proposal.

* As direct customers of the IANA service, registry operators (ccTLDs and gTLD) should have prominent representation on any oversight committee or organisation intended to replace NTIA's role.

* Registry operators should have the casting vote on any future decision to remove the IANA function from ICANN; however, any decision to remove the IANA function from ICANN must be for reasons of continued poor performance or incompetence.

* The current performance of the IANA service as it relates to naming functions is satisfactory. There have been many improvements in the quality of service in recent years and this can be attributed to the IANA Department responding to the needs of their customers as well as adhering to the requirements and SLAs contained in the contract between NTIA and ICANN as the IANA Functions Operator.

* There must be no transition of the NTIA oversight of the IANA functions before

the conclusion of the Accountability CWG discussions and as such no transition proposal can be submitted to the ICG until the implications of any recommendations from the Accountability CWG, as it pertains to the IANA function, are understood.

Regards

Donna

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