

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

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comments by Afnic on CWG draft proposal

- *To:* <comments-cwg-naming-transition-01dec14@xxxxxxxxxx>
- *Subject:* comments by Afnic on CWG draft proposal
- *From:* Pierre Bonis <pierre.bonis@xxxxxxxxxx>
- *Date:* Mon, 22 Dec 2014 23:17:28 +0100 (CET)

Afnic welcomes the naming related functions draft transition proposal to NTIAS oversight of the IANA functions published by the CWG, and want to commend its members and supporting staff for the impressive amount of work and their dedication.

The published proposal, as recalled by the CWG itself, :

- Is not yet complete (last sections will depend on the sections currently opened to discussion)
- Covers only the naming IANA function of the multistakeholder proposal for the IANA transition
- Is highly dependent or interdependent with the work currently underway on the ICANN accountability,

Afnic is concerned by the actual complexity of the proposal, given the fact its not covering all the aspects that need to be dealt with before the final submission.

As we move forward, Afnic would like to call for a simplification of the proposal, by narrowing the roles of each of the bodies created to replace the role of the NTIA.

To be more specific :

1/ On the structural or functional separation between IANA and ICANN.

Once recalled than the policy making of the rules that have to be followed by IANA must be distinct from this body, the need for a very clear separation between IANA and the policy making body is obvious.

We feel that the structural separation from ICANN is not enough envisaged in this document, as it could be a powerful simplifier of the proposal. In any case, the choice between functional and structural separation has tremendous consequences on the ICANN accountability work currently underway, and as such, the two options should be clearly and equally put on the table to allow a risk assessment of the two solutions.

2/ On the proposed structure (i.e. the new bodies proposed).

- CSC : all direct customers of the IANA naming function should be represented, and only them. These customers (essentially CCTLDs and GTLDs) are already liable to other parties for their own and final SLAs, that depend heavily on IANA performance. There is no need to expend the composition of this committee to indirect customers. Furthermore, having indirect customers within this committee would make harder to distinguish it from other bodies, such as the MRT, creating confusion and possible overlaps between the various bodies. In particular, the CSCs role should be focused on setting the technical SLAs with the contractant and reviewing the IANA technical performance.

- MRT : We see the MRT as the heart of the proposal, and view this body as the true steward of the multistakeholder approach. Therefore, this body should be focused on organizing the multistakeholder open consultations rather than representing the various stakeholders. In order to do so, and to be fully in position to draft contracting decisions, this body must be adequately funded and staffed. And once again focus on drafting contracting decisions after extensive consultations, as the review of technical performance should lies with the CSC. Any decision made by the MRT when it comes to reassigning the IANA naming function should be decided, not only by the MRT, but proposed by the MRT to the direct customers and other parts of the community. This mechanism still have to be described.

- On the independent certification on delegation and redelegation requests, as well as the independent review panel, the proposal should state more clearly that only the way IANA followed the specific policy should be checked, and in no case or no circumstance should the panel take a biding decision that is not exclusively and only based on these specific policies IANA have and will continue to have to follow. In other words, only IANAs fulfillment of its due diligences regarding the policies agreed are to be checked, and in no circumstance the proposed delegation or redelegation per se.

3/ On the relations between IANA and the Root Zone maintainer (RZM).

Unless there is a thorough analysis of the root zone publisher function, especially by what mechanisms it is bound to publish IANA-approved changes to the root zone, Afnic believes no responsibility given whether to the MRT or to contract Co. or even to IANA operator itself could be fully fulfilled.

The root zone publisher has to remain committed to publish changes in the root when, and only when, they are approved by the IANA Operator, and that, in Afnic's views, should be clearly stated in the transition proposal.

The proposal should therefore choose between three options, in our views :

status quo (RZM contracts with NTIA)

Contract Co. contracts with RZM
IANA Operator contracts with RZM

In any case, any change approved and asked by the IANA operator to be implemented after full review should be implemented by the RZM, and this should be included in any new contract passed with the RZM. It seems to us this should be stated in the proposal, in order to secure the overall naming function transition.

Best regards,

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