

A response to “Second IANA Naming Function Review Team (IFR2) Initial Report”

Dear ICANN, I wish to thank you for the chance to comment on the IFR2 initial report. I am doing so in a private capacity, as an individual in the Internet, and a TCR in the east coast KSK processes. I am a board member of the IETF LLC, a member of the ISOC and an employee of the APNIC RIR and none of these associations have any relationship to this submission or my request for consideration here.

I have only one point of concern I would like to raise with you: This report does not canvas the location of the Hardware Security Modules (HSM) and ceremonies conducted using them, to manage the state of the DNSSEC trust anchor: The KSK and it's products. I feel this is a problem and requires re-consideration. ICANN should be seen to discuss the location of the HSM functions it performs as a worldwide trust.

I have no criticism to make of ICANN/IANA staff performing this function. I am a recent TCR and I have therefore seen them operate in the Culpeper facility, I am familiar with the personnel who implement this function. I have the utmost respect for them individually and as a team. All the evidence in documentation of outcome, process management and change, and my own observations of the task show this is being performed as the community at large would want: People involved take their role serious and perform this to the best of their collective ability.

My concern is that with 15 years of operations which were started with an East Coast and a West Coast HSM, The wider community has been required to acquiesce to a decision made under different times and circumstances regarding the location of the HSM. I do not have copies of mail to hand, but private communications received at the time when I noted this made it plain this was considered but it was not felt expedient to move directly to operation of an HSM outside of the continental USA. There was no substantive discussion of this matter, nor any discussion of a review process, nor a mechanism to commence a review of this decision. Considering the early stage of ICANN in it's lifetime and relationship to functions undertaken with the consent of the US department of state, or similar agencies, I can understand how this was not included at the time.

However I feel times have changed, and I wish to ask ICANN to begin a formal review of the conditions necessary to include a location outside of the continental USA in the set of places which operate an HSM for the management of the DNSSEC root trust. I do not specify how this review should happen although I expect a range of community consultation mechanisms can be used, many of which ICANN has already used. It is of course entirely possible this review will say there is no need, nor is this possible in the current circumstances but I would like the formalism of a public engagement to be undertaken, and a public review of decisions made regarding this function.

I also do not specify if this should be a relocation or an augmentation: If an existing east or west coast facility should be replaced by an HSM located elsewhere, or if an additional HSM should be added. I would note that in terms of functional simplicity, replacement would leave all operational duty cycles related to HSM functions exactly as-is, merely replacing a point of operation with another. Augmentation would necessitate a review of the duty cycles relating to the HSM, and production of signed materials. It is also clear this is not a zero-cost activity and therefore I am asking ICANN to consider an increase in the direct operational costs, and the incurrence of a continuing cost to manage a secure facility. Travel and related costs would broadly speaking be the same since existing travel requires financial assistance to several TCR and there would be no net change in that burden considering all the elements.

I wish to note as well that ICANN has offices in Geneva and Singapore, and without limiting ICANNs options for a location I consider either as highly suitable for operation and storage of an HSM in a secure facility. They have different qualities, but both represent well understood, developed, technologically and legally stable jurisdictions with an ability to manage international access which aligns with ICANNs mission and goals.

Why am I requesting this review? I am requesting this review of the locations of the HSM solely in the interest of a wider community interest in the integrity of the process. Not a lack of trust in ICANN or of the operations practices, or the staff. I simply feel that as a truly international body with engagement in national and international affairs, It is helpful for a perception of independence and equity in that context, to demonstrate unity of purpose by including the “rest of the world” in the process beyond the TCR roles. Ideally of course I would like ICANN to actually do a relocation of one of the HSM but the principle here is that it should be discussed, and a decision made on robust defensible grounds in the public interest.

There are also specific short-term concerns relating to freedom of movement of TCR participants to the USA which I believe should be considered, and the future risk of similar restrictions on access to the facilities in the US be borne in mind. If (for instance) the minimum quorum of TCRs cannot attend due to issues in visa and US immigration, there would be a loss of trust from the routine adoption of smaller quorum and mechanistic methods to get HSM related secure materials into use. This was enacted during Covid and so I have trust the actual mechanism is understood but it would seem plain this does not represent an ideal level of either “trust” or “community” involvement and inclusion.

I realise this will possibly be an unwelcome distraction for you, considering the IFR2 review process and if you feel this is not appropriate as feedback please let me know a mechanism to submit to, which will permit due consideration of this issue.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized, cursive 'G' followed by a horizontal line extending to the right.

14 April 2025

George Michaelson

Second IANA Naming Function Review Team (IFR2) Initial Report

NCSG Comments

April 24, 2025

About NCSG

NCSG represents the interests of non-commercial domain name registrants and end-users in formulating the Domain Name System policy within the Generic Names Supporting Organisation (GNSO). We are proud to have individual and organizational members in over 160 countries, and as a network of academics, Internet end-users, and civil society actors, etc, we represent a broad cross-section of the global Internet community. Since our predecessor's inception in 1999, we have facilitated global academic and civil society engagement in support of ICANN's mission, stimulating an informed citizenry and building their understanding of relevant DNS policy issues.

About this Public Comment

<https://www.icann.org/en/public-comment/proceeding/second-iana-naming-function-review-team-ifr2-initial-report-20-03-2025>

Our Comment on this subject

We commend the Second IANA Naming Function Review Team (IFR2) for their outstanding efforts in evaluating PTI's performance of the IANA naming function, a critical accountability role in this ecosystem.

NCSG supports all four recommendations and in particular, strongly supports the principles behind Recommendations 3 (Contract Amendment Transparency) and 4 (Frequency of Reviews).

In line with our principles, it is important to NCSG that there is full transparency in contract amendments. Therefore, making any amendments to the PTI contract publicly available is critical, and according to the transparency requirements of the IANA Naming Function contract.

Similarly, we strongly support Recommendation 4 (“amending ICANN Bylaws Section 18.2(b) to read “once every five (5) years, measured from the date that the most recent IFRT submits its Final Report to the ICANN Board of Directors.””), since it is important that the use of volunteers’ time is well managed. We believe ensuring that previous IFRT recommendations are given time to be implemented with sufficient time included to observe their impact by subsequent review teams is a sensible approach.

Regarding Incidental Finding 4: Ombuds, we fail to see the confusion in the complaint escalation process to ICANN Ombuds. As the initial report rightly states, the Ombuds process is only triggered “If the Complaint is still not resolved, the Complainant or the President of Contractor may escalate the matter in writing to ICANN’s Ombudsman.” How then could this be confusing to the complainant?

Summary of Submission

NCSG supports all four recommendations and in particular, strongly supports the principles behind Recommendations 3 (Contract Amendment Transparency) and 4 (Frequency of Reviews).

RrSG Input: [Second IANA Naming Function Review Team \(IFR2\) Initial Report](#)

28 April 2025

The RrSG appreciates the work of the Second IANA Naming Function Review Team (IFR2) and the opportunity to comment on the Initial Report. We support the findings of the IFRT2 that PTI “operates reliably, efficiently, and serves the needs of IANA Naming Function customers” and agree that some clarifications to the IANA Naming Functions Contract can prove beneficial.

IFRT2 Finding 1: DNSSEC Policy and Practice

The RrSG supports the clear articulation of responsibility for policy, standards, and best practices, as well as efforts to future-proof the contract by reducing overly prescriptive language that is subject to potential change. As such, the RrSG supports these Recommendations to remove specific DNSSEC operational details from the IANA Naming Function Contract and to also identify and point to the relevant policy authority. The RrSG anticipates that a community based mechanism would determine the relevant authority and supports this work being done.

IFRT2 Finding 2: Contract Amendment Transparency

The RrSG strongly supports making the amended Contract publicly available. This is in keeping with ICANN’s fundamental standards of transparency and accountability.

IFRT2 Finding 3: Frequency of Reviews

The RrSG is sensitive to the issue of review timing overlapping with implementation of the previous review, and supports the adjustment of the review period to accommodate more time for implementation and consideration of the effects of prior changes. Amending the required starting point of the Review to be tied to the most recent (prior) submission of the Final Report to the ICANN Board of Directors instead of to the start date of that prior Review is an appropriate adjustment.

IFRT2 Incidental Findings

The RrSG has no specific comments and offers our support for these Incidental Findings.

Thank you,

Owen Smigelski
Chair, Registrar Stakeholder Group

CSC Comment 2nd IANA Naming Function Review Team (IFR2) Initial Report

Date 28 April 2025

The Customer Standing Committee (CSC) appreciates the opportunity to provide comments on the Second IFR Initial Report.

The CSC has reviewed the Initial Report keeping in mind the mission of the CSC, which - according to its 2018 Charter - is to ensure continued satisfactory performance of the IANA function for the direct customers of the naming services. The CSC is responsible for monitoring Public Technical Identifier's (PTI) performance of the IANA naming function against the service level expectations in the IANA Naming Function Contract. Consequently, the CSC has closely followed the Second IANA Function Review (IFR2).

Please note that the views expressed in this comment do not represent and should not be interpreted as comments from any of the organizations appointing members or liaisons to the CSC.

We note the timely completion of the Initial Report and appreciate the efforts of the Review Team for their efforts.

The CSC supports the recommendations contained in the Initial Report. In particular, we would like to highlight the following Findings and Recommendations:

- Recommendation 4 (see Section 2.3.1), which relates to the Frequency of Reviews. The CSC agrees that adjusting the frequency of the IFR would improve the effectiveness of the IFR by allowing the impacts of changes related to the prior review to be observed before the subsequent review begins.
- Incidental Finding 3: SLA Reporting (see Section 2.4.3) - The CSC appreciates the IFRT's findings with respect to PTI performance and fully supports the observations with respect to the impact of external factors on PTI's SLA achievement. The CSC wants to note that for that matter the CSC and PTI jointly are updating the SLA amendment procedure, which after adoption, would allow PTI and the CSC to identify and address the kind of exceptions systematically. In the past PTI and CSC have amended some of the original SLA to address the kind of issues the IFRT has identified.
- Incidental Finding 4: Ombuds (see Section 2.4.4) - Additionally, the CSC also agrees with Incidental Finding 4. We agree that Article 8 of the IANA Naming Function Contract, which includes a role for the ICANN Ombuds in the event that a complaint is not resolved by the initial process within the CSC, as described in the Initial Report, has not led to operational problems. We also agree, however, that defined structure for complaints might result in confusion. Therefore, we fully support that the subsequent

Accountability and Transparency Reviews (ATRT) or any other review or effort is advised to explore this topic further.

For the record we note that although the CSC is informed complaints have been made, the procedure is NOT “within the CSC, as described in the Initial Report”, but within PTI. The CSC is not mandated to be directly involved in the resolution of individual complaints.

On behalf of the CSC
Rick Wilhelm, chair
Hiro Hotta, vice-chair

Second IANA Naming Function Review Team (IFR2) Initial Report

Individual Comment from Olivier Crépin-Leblond, PhD / 28 April 2025

Since the IANA Stewardship Transition and the ICANN Accountability Process of 2016, matters of IANA and its functions have been subjected to thorough review processes as part of ICANN's Review processes. These are ingrained in the ICANN Bylaws.

Article 16 of the ICANN Bylaws includes matters pertaining to Post Transition IANA.

Article 17 focuses on the Customer Standing Committee, with the (CSC) Periodic Review defined in Section 17.3

Article 18 Focuses on the IANA Naming Function Reviews (IFR).

In particular, this includes Section 18.3 which states the IFR Responsibilities:

- a. Performance of PTI in regards to needs to direct customers
- b. Performance of PTI in regards to IANA Naming Function SOW
- c. IANA Naming Function SOW
- d. Openness and Transparency Procedures
- e. Performance and Effectiveness of Empowered Community
- f. Performance of IANA naming function compared with preceding IFR
- g. Reviewing Systemic Issues re: PTI
- h. Initiate Public Comment Periods
- i. Consider input from Customer Standing Committee (CSC) and the community on PTI's performance
- j. Identify process or other areas for improvements in relation to these contracts
- k. Consider and assess any changes implemented since the previous period

It is clear that matters of IFR and PTI are very closely monitored as part of ICANN's Organisational Review Processes.

However, I must point out one deliverable of the IANA Stewardship Transition Process that does not appear to have been given the same importance, but which should also be subjected to the same due diligence as the other IANA related processes: the IANA IPR agreements.

These can be found on the IETF Trust Web Site:

<https://trustee.ietf.org/iana-ipr/>

The processes for the Names Community to appoint members of the Community Coordination Group, as defined in the IANA IPR Community Agreement, are unclear. In fact, none of the Agreements are subjected to the same amount of scrutiny and diligence as the contracts directly affecting IANA and PTI. There is no “review” of these contracts or processes. Nine years later, these agreements subsist, despite significant shortcomings – and now there is a proposal that one of the signatories is replaced:

On 15 July 2024, Glenn Deen, as Chair of the IETF Trust, announced the transfer of IANA Intellectual Property held and managed by the IETF Trust to a new not-for-profit Delaware based IETF Intellectual Property Management Corporation (“IPMC”) that the current IETF Trust a Virginia based Common Trust entity is restructuring into.

Mr. Deen asked for the members of the Community Coordination Group (CCG) to send their agreement on behalf of their communities. In the absence of clear ICANN processes to address this request, the matter has, thus far, not progressed.

At the ICANN meeting in Seattle, I have met with ICANN Legal and shared my concerns, as there could be significant holes in the current agreements and even larger ones in a future agreement with the new entity.

I should therefore make one comment and ask one question:

Comment: Whilst the IFR2 has clearly undertaken its review of the IANA Functions according to the ICANN Bylaws, it appears that there are no ICANN process ingrained in its Bylaws for the IANA IPR Agreements to be formally monitored and involve the Names Community. This lack of process includes the naming of CCG members as well as any operational decision process in relation to IANA IPRs that involves the Names Community. I would recommend that your group obtain more information from ICANN Legal in regards to the concerns I have expressed and shared with them, which include a lack of safeguards in retrieving the intellectual property rights of IANA and little or no control over them.

Question: If this matter is out of scope for the IFR2, then whose task is it to make recommendations to create the necessary accountability, transparency and decisional processes for IANA IPR issues to be monitored with the same diligence the other IANA matters have been addressed?

Second IANA Naming Function Review Team (IFR2) Initial Report

ccNSO Council Comment

Introduction

The ccNSO Council welcomes this opportunity to provide input on your Initial Report. To avoid any misunderstandings, this comment is a ccNSO Council comment, and the views expressed in this comment should not be interpreted as views from the ccNSO members, nor from individual ccTLD managers.

The ccNSO Council also welcomes the structure of the recommendations, specifically inclusion of the expected due date and priority per recommendation.

General Comments

The ccNSO Council is very pleased to note that the IFR2 team has found that PTI operates in a reliable and efficient manner, serves the needs of the IANA Naming Function customers - which includes the ccTLDs - and has found no performance deficiencies nor major opportunities for operational improvements.

The ccNSO Council appreciates all the findings in the report and fully supports all recommendations as included in the Report. However, with respect to recommendation 2.3 and the findings in 2.4.4, the ccNSO Council requests the IFRT to take the ccNSO's specific observation into consideration, in preparing the Final Report.

Specific Observations

- **Specific Observation 1 regarding IFRT2 Finding 3 Frequency of Reviews**

The ccNSO Council fully supports the IFRT recommendation to amend the frequency of reviews as proposed. The Council also notes that, together with the GNSO Council, it endorsed a similar recommendation made by the second CSC Review Team—which, notably, is still pending implementation. To prevent overlapping reviews, the ccNSO Council suggests that in implementing both the IFRT and CSC RT recommendation, it is ensured that the starting dates of the 3rd IFR and CSC are 2.5 years apart. In the view of the ccNSO Council, the IFR and CSC review are partly overlapping in content (for example with respect to SLAs and SLA reporting), and also, likely, with respect to membership of the teams.

- **Specific Observation 2 regarding Incidental Finding 4: Ombuds**

The ccNSO Council appreciates the findings with respect to Article 8 of the IANA Naming Function Contract. Accordingly, and as part of the section 8.1 complaint process, a complainant may escalate a complaint to the ICANN's Ombudsman. This

becomes a requirement if a complainant seeks the mediation as provided under the contract.

The ccNSO Council notes that the Ombuds is always available to resolve problems (see for example the IANA Complaint Resolution Process <https://www.iana.org/help/complaint-procedure>), independent and not linked to the complaint process as provided under section 8.1 of the Contract.

Assuming the ccNSO proposed Review Mechanism for specific decisions will be adopted and implemented, the already complicated pathways to resolve complaints for direct customers of the IANA Naming Function, which includes all ccTLDs, will become even more entangled and less obvious.

Although the ccNSO Council appreciates that the IFRT is in no position to resolve these issues, the Council suggests that the IFRT change its recommendation to include a call for ICANN org, direct customers, and other stakeholders to review the full range of complaint procedures, to streamline them and reduce the complexity. The ccNSO Council notes that the more recent discussions about scheduling reviews (and ATRT4 in particular) would suggest a special approach to this particular issue

The ccNSO Council is of the view that, with the introduction of the Review Mechanism adequate checks and balances to protect against capture are introduced, mitigating the need to make the Ombuds part of the Article 8 complaint procedure.

On behalf of the ccNSO Council

Alejandra Reynoso,
Chair

Name: Registries Stakeholder Group (RySG)

Date: 25 Apr 2025

Email: publiccomments@rysg.info

Original Public Comment: [Second IANA Naming Function Review Team \(IFR2\) Initial Report](#)

Other Comments

The Registries Stakeholder Group (RySG) welcomes the opportunity to comment on the Second IANA Naming Function Review (IFR) Initial Report and extends its thanks to the members of the Review Team for their work on this effort.

Members of the RySG operate generic top-level domains via contracts with ICANN, and are the direct customers of the IANA Naming Function. We recognize the important role the IFR plays in ensuring the ongoing accountability of PTI as the steward of the IANA function and as such have reviewed the Initial Report with keen interest. We are pleased to note that the RySG supports each of the recommendations contained therein, as we believe they will promote transparency and improve efficiencies going forward.

The RySG also supports the IFR's inclusion of Incidental Findings, which "did not rise to the level of a formal recommendation", as a means to promote efficiency in the Review Process and as a demonstration that the IFR was operating according to its documented Terms of Reference.

Summary of Submission

The RySG supports each of the recommendations contained therein, as we believe they will promote transparency and improve efficiencies going forward. The RySG also supports the IFR's inclusion of Incidental Findings.

Name: Benson Mugure

Date: 21 Apr 2025

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Email: b.mugure@alustudent.com

Original Public Comment: [Second IANA Naming Function Review Team \(IFR2\) Initial Report](#)

Other Comments

Comments on DNSSEC Policy and Practice:

The IFRT2's recommendation to remove specific Domain Name System Security Extensions (DNSSEC) policy details from the IANA Naming Function Contract and instead identify and point to the appropriate policy authority aligns with principles of good contract management and adaptability. Embedding technical policy details within a long-term contract can lead to the contract becoming outdated quickly as best practices and technologies evolve. By referencing an external, authoritative policy source, the contract can maintain its relevance without requiring frequent amendments for technical updates.

Question: How will the "appropriate policy authority for DNSSEC" be formally identified and documented within the IANA Naming Function Contract? Will there be a specific mechanism for ensuring that this referenced authority is widely recognized and trusted by the ICANN community?

Analysis:

Pro (Removing Specific Details): This approach offers greater agility and allows DNSSEC policies to be updated more efficiently by the relevant technical bodies without necessitating a formal contract amendment process, which can be lengthy. It promotes the use of current best practices.

Con (Removing Specific Details): There is a potential risk of ambiguity if the referenced policy authority is not clearly defined or if its decision-making processes lack transparency. Stakeholders might find it harder to ascertain the exact DNSSEC requirements by solely relying on an external reference.

Pro (Identifying Policy Authority): Clearly identifying the authoritative source enhances transparency and allows stakeholders to easily locate the applicable DNSSEC policies. It clarifies responsibilities for policy maintenance.

Con (Identifying Policy Authority): Identifying a single "appropriate" authority might be challenging given the distributed nature of internet governance and the

various bodies involved in DNS security. There might be disagreements on which entity holds the ultimate authority on DNSSEC policy best practices.

Benchmarking against similar organizations that manage technical standards often reveals a preference for referencing external specifications rather than embedding detailed technical information within foundational governance documents. This allows for more flexible and expert-driven evolution of technical standards.

Comments on Transparency and Availability of Contract Amendments:

The IFRT2's finding that amendments to the IANA Naming Function Contract were not immediately obvious or available to the review team highlights a crucial aspect of transparency in any organization, especially one with a significant public interest mandate like ICANN. The recommendation to make the amended contract publicly accessible or provide a clear mapping of amendments is essential for accountability and for facilitating informed participation from the community and review bodies.

Question: What specific mechanisms will be put in place to ensure that all future amendments to the IANA Naming Function Contract are easily identifiable and accessible to the public? Will a version control system or a clearly marked consolidated version of the contract be implemented?

Analysis:

Pro (Improved Transparency): Enhanced transparency regarding contract amendments builds trust within the community and enables stakeholders to understand the current contractual obligations of the IANA Functions Operator. It also facilitates the work of future review teams.

Con (Improved Transparency): Implementing a system for tracking and displaying amendments might require some initial effort and resources. There's also a need to ensure that the system is user-friendly and that stakeholders are aware of its availability.

Pro (Mapping Amendments): Providing a clear mapping of amended lines alongside the original contract offers a straightforward way for stakeholders to understand the changes.

Con (Mapping Amendments): Maintaining an accurate and up-to-date mapping could become complex if there are frequent or extensive amendments. Accessing two separate documents (original and the map) might be less convenient than a consolidated amended version.

Many standards development organizations and multi-stakeholder initiatives prioritize clear and accessible documentation of their foundational agreements and any subsequent modifications. This ensures that all participants operate under a shared understanding of the governing rules.

Comments on Frequency of Reviews:

The IFRT2's recommendation to amend ICANN Bylaws Section 18.2(b) to measure the five-year IANA Naming Function Review period from the date the IFRT submits its Final Report to the ICANN Board of Directors, rather than when the previous IFRT was convened, addresses a practical concern about the time available to observe the impacts of prior changes. Given that periodic IFRs take 12-18 months to complete, starting a new review too soon after the previous one concludes might limit the ability to assess the effectiveness of implemented recommendations.

Question: What measures will the ICANN Board of Directors put in place to "ensure that procedural controls exist to mitigate the risk of stalled reviews" if the review period is tied to the submission of the final report?

Analysis:

Pro (Changing Review Frequency Metric): Aligning the review cycle with the submission of the final report allows for a more meaningful interval to observe the outcomes of the previous review's recommendations before the commencement of the next one. This can lead to more informed and effective reviews.

Con (Changing Review Frequency Metric): There is a potential for delays in the completion of an IFRT's work, which could inadvertently extend the review cycle beyond the intended five-year period if not managed effectively.

Pro (Current Review Frequency Metric): Measuring from the convening date provides a more predictable schedule for the reviews.

Con (Current Review Frequency Metric): As highlighted by the IFRT2, this can lead to new reviews starting before the impact of the previous recommendations can be adequately assessed.

Organizations with periodic review mechanisms often adjust their schedules based on the complexity of the issues being reviewed and the time needed for implementation and observation of changes. The IFRT2's recommendation reflects a pragmatic approach to ensure the review process remains effective.

Summary of Submission

This submission generally supports the recommendations of the Second IANA Naming Function Review Team (IFRT2) Initial Report. The recommendations regarding the removal of specific DNSSEC policy details from the IANA Naming Function Contract and the clear identification of the relevant policy authority are in line with good contract management and adaptability. The emphasis on enhancing the transparency and accessibility of contract amendments is crucial for accountability and informed stakeholder participation. Finally, the proposed change to the frequency of reviews, measuring from the submission of the final report, appears to be a sensible adjustment that will allow for a more thorough assessment of the impact of prior recommendations. It is important that ICANN clearly defines the referenced DNSSEC policy authority, establishes robust mechanisms for making contract amendments easily accessible, and implements procedural controls to prevent undue delays in the review process.