

**Cross-Community Working Group on Naming-Related Functions
Public Consultation on Draft Transition Proposal, 1 December 2014
Response from UNINETT Norid AS**

Introduction

UNINETT Norid AS (Norid) is the registry for the .no country code. Norid has been participating in ICANN from the year 2000. We are member of CENTR and of the ccNSO. We are also the registry operator for .bv and .sj that are not active just yet.

We welcome the announcement by the US government on their intention to transfer the stewardship of the IANA functions from NTIA to the global multi-stakeholder community. We also welcome the work that the CWG-IANA has done.

Comments

Norid cannot see that the NTIA stewardship has been anything else than good governance. We find it necessary that at least the same level of stewardship should be maintained. And we should not be tempted to create a whole new system. We are concerned that the introduction of multiple organisations/players to replace the lightweight NTIA authorization role of today might be confusing and very bureaucratic. And that it will be alienated from the community.

We therefore think that an alternative ICANN-based solution should be considered before making the final decision. With sufficient safe-guards and control this could function. But of course, we recognise that the time given for a solution probably is too short.

For all the different organizations suggested the mandate and responsibility should be clarified and it should not be possible to change the mandate without through a transparent process. We are concerned that references to the evaluation of delegation and redelegation reports can be interpreted as assigning additional authorities to new committees and bodies.

As for the CSC (Customer Standing Committee) we think it is really important that the committee is composed of IANA customers only. The review of delegation and redelegation reports should be removed. We do not support the assignments of any evaluation of delegation and redelegation reports to the CSC.

As for the MRT (Multistakeholder Review Team) the composition of the group is essential. We do not approve that it should be possible for a group of non-registries to reassign the IANA contract based on anything else than serious performance issues. It seems that we could end up with a very large group, and we are afraid that the registries – ccTLDs and gTLDs – who are the real customers of IANA – could be outvoted. This will mean that one of the essential

elements for a secure DNS is out of the hands of the registries. The ccTLD operators have invested significantly in security, robustness and stability of our operations for many, many years. It is very important that any key process in the ccTLDs operations is not in the hands of any interest group, leaving TLD operators with a single point of failure.

As for the IAP (Independent Appeals Panel) its role should only be to assure that due process has been followed in the case of appeals on delegation and redelegation, and then either accepting the decision or referring it back to the IANA functions operator and ask for explanation. It is not clear who can launch an appeal and on what grounds. We would like to strongly underline the local and national character of a ccTLD and the principles of subsidiarity.

UNINETT Norid AS
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