Comments of China Internet Network Information Center (CNNIC) on the Draft Transition Proposal of Cross Community Working Group (CWG) on Naming Related Functions

19 Dec 2014

On behalf of China Internet Network Information Center (CNNIC), hereby we would like to take this opportunity to provide our comments on the Draft Transition Proposal of Cross Community Working Group (CWG) on Naming Related Functions. We focus mainly on the third part of this mid-term proposal "proposed post-transition oversights and accountability arrangement". Our comments are as follows.

1. General comments

Firstly, we appreciate all the efforts made by CWG to develop the naming related transition proposal. It plays a positive role in carrying forward the progress of IANA stewardship transition. Given that developing the transition proposal is a challenging but pivotal responsibility for the global internet community, we are willing to make our further contributions to it.

In addition, given that the transition should take place under several conditions including: a) the requisite accountability mechanisms have been identified by the CCWG-Accountability; b) accountability mechanisms and other improvements that the community determines are necessary pre-transition have been put in place; c) agreements and other guarantees are in place to ensure timely implementation of mechanisms that the CCWG-Accountability decides may be implemented post-transition, we suggest that the CWG shall process the comments and suggestion to the draft proposal of IANA stewardship transition in a high-standard,

consensus-based, accountable and transparent manner. The transition proposal shall be completed according to published timeline without any delay.

For the domain name related function is a part of the IANA functions, CWG needs to cooperatively consider other related functions when developing the naming related proposal. The different function of IANA should be integrated in a simple and effective manner.

2. Specific comments

(1) Comments on the relationship among the IANA function operator, the administrator and the maintainer

We recommend that a kind of tripartite relations among the operator, the manager and the maintainer shall be more accountable and transparent. To effectively and securely managing the root zone shall be always prioritized during the process of proposal developing and transition. The organizational structure replacing NTIA's roles in managing IANA functions shall be a integrated and well organized structure combing the management, supervision and policy updating functions, whose composition shall reflect the principle of multi-participation and equal consultation.

(2) Comments on the proposed structure based on the multistakeholder model

We noticed that the proposal presented a new structure which claims as to enhance the multistakeholder model. We encourage this new structure to mandate real multi-participation by all stakeholders, to conduct the global bottom-up supervision on the root zone operation, which will be conducive to replace the functions of NTIA. We also recommend that ICANN, as the current root zone operator shall take this opportunity to further advance its globalization and promote ICANN's reforms toward the direction of more transparency and openness

(3) Comments on the proposed four-part structure

◆ Regarding to the function and responsibility of the new structure

We consider that the four-part structure, namely Contract Co., Multistakeholder Review Team MRT (abbreviated as MRT), Consumer Standing Committee (abbreviated as CSC) and Independent Appeals Panel (abbreviated as IAP), is moderately complicated, and the functions and responsibility of each entity is not clearly defined, especially there are ambiguous overlaps of the functions between MRT and CSC. We recommend that MRT shall abide by the principle of Multi-participation, taking the responsibility for developing the detailed IANA contract and administration of daily routine. We recommend that CSC, as the representative collective of the registries of ccTLDs and gTLDs as well as naming directly related stakeholders, shall implement the supervision on the policies and actions of MRT, and shall provide the corresponding policy support in order to guarantee the quality of the decisions and service standards made by MRT.

The proposal illustrates that the Contract Co. will replace NTIA to sign the IANA contract with ICANN, given that this entity has a close relationship with internet mutistakeholders , we recommend that it shall be incorporated in the neutral state where the office of the entity shall be set up to guarantee its independence.

◆ Regarding to the composition of the new structure

As regards the proposed composition of the new structure, we hold the point of views that if MRT's members are selected in accordance to the existing multi-stakeholders regulation, the overlaps with ICANN's existing structure and personnels is hard to avoid. Therefore, we recommend CWG to consider that, and make further formulation and illustration, the purpose of which is to avoid conflicts of the interest. In addition, we also recommend that MRT and CSC shall strictly

follow the principle of bottom-up, fair and just as well as transparency in member selection, and ensure the participation seats of the developing countries.

(4) Comments on the role of ccTLD community in IANA transition process

We recommend that the opportunities and appropriate participating mechanism shall be provided for the representatives from the ccTLD community to discuss key service levels requirements of IANA functions.

We also suggest that the public policies which are related to ccTLD and its root zone management shall be decided by each country, but it seems that there are not corresponding mechanism of coordination and policy making in the present proposal.

China Internet Network Information Center

[About CNNIC]

China Internet Network Information Center (abbreviated as CNNIC) is an administration and service organization set up on June 3, 1997 upon the approval of the competent authority and undertakes the responsibilities as the national Internet network information center. In light of the policies of "providing efficient and application oriented services through secure & stable Internet infrastructure for public interests", CNNIC, as leading actor in Chinese information society, is responsible for operation, administration and services of fundamental Internet resources, undertakes R&D and security work of fundamental Internet resources, conducts research on Internet development and internet governance, and promotes the cooperation and technological exchange of global Internet. A global platform for internet governance research called internet governance research center (IGR) has also been founded by CNNIC.