

**Internet Services Provider and Connectivity Provider Constituency
Comments on the CWG 2nd Draft Proposal on IANA Stewardship
Transition**

along the Input Template

1. Please provide your name: **Internet Services Providers and Connectivity Providers Constituency**
2. Please provide your affiliation:
3. Are you providing input on behalf of another entity (e.g. organization, company, government)? Yes/No
4. If you answered 'yes' to the previous question, please list the entity on whose behalf you are submitting these questions:

General Comments

5. If you have any general comments you would like to provide on the CWG-Stewardship Proposal, please provide these here.

We acknowledge the enormous engagement being undertaken by the CWG members having led to the draft proposal in a short time.

In general we offer support for the proposal to replace the present NTIA stewardship role on IANA with the structures envisaged.

Section III - Proposed Post-Transition Oversight and Accountability

8. Do you have any specific comments or input you would like to provide with regards to section III.A - Elements of this Proposal? This section describes in short the main elements of the proposed post-transition oversight and accountability.

We believe that the proposed elements are building an acceptable high level structure

9. Do you have any specific comments or input you would like to provide with regards to section III.A.i - Proposed Post-Transition Structure. This section provides an overview of the different elements of the proposed post-transition structure.

As pointed out in our comment during the last public comment period ISPs' businesses to a large extent rely on IANA service customers. It is several times expressed by IANA customers that they are satisfied by the present service offered and guaranteed. They do not want a fundamental change in the supervision structure which they fear could potentially harm the service level.

In this regard the ISPCP don't see a need to change the IANA functions operator. Any form of stewardship transition should therefore diligently incorporate the present operator.

10. Do you have any specific comments or input you would like to provide with regards to section III.A.i.a. - Post-Transition IANA (PTI). This section describes the proposed post-transition IANA.

ISPCP supports the creation of a PTI legally separated from ICANN and with a 100% transfer of the present IANA functions operator. Because sufficient details do not exist in the current proposal, the CWG should work to develop clear details for how separation would be initiated. Who will be responsible for making such a decision, and what precise options available to those calling for separation?

11. Do you have any specific comments or input you would like to provide with regards to section III.A.i.b. - Post-Transition IANA Board. This section describes the proposed Board for the post-transition IANA.

Filling the PTI board with the right membership is crucial to the ISPCP. The mechanism of selecting board members should be community-wide discussed. We see board representation from a community where ISPs are part of as being necessary.

13. Do you have any specific comments or input you would like to provide with regards to section III.A.i.d. - IANA Function Review. This section describes the proposed periodic as well as special review of the IANA Function.

ISPCP support establishing the IFR and fixing it within the ICANN bylaws in principle. However with regard to the periodicity we suggest to be more flexible. The schedule could be fixed after the first IFR (2 years after the transition).

14. Do you have any specific comments or input you would like to provide with regards to section III.A.ii.a. - Customer Standing Committee (CSC). This section describes Customer Standing Committee that is expected to oversee performance of the IANA Functions as they relate to naming services.

ISPCP supports the creation as well as the proposed role of the CSC.

15. Do you have any specific comments or input you would like to provide with regards to section III.A.ii.b. - Service Level Expectations. This section describes the proposed service level expectations post-transition.

ISPCP support the work undertaken to measure future SLEs with the high quality level provided at present.

16. Do you have any specific comments or input you would like to provide with regards to section III.A.ii.c. - Escalation mechanisms. This section describes the different proposed escalation mechanisms as they relate to the naming services.

The 3 escalation mechanisms described are supported to be introduced. However more details are requested with regards to the definition and solving of systemic issues.

17. Do you have any specific comments or input you would like to provide with regards to section III.A.ii.d. - Separation review. This section describes the separation review that can be triggered by an IANA Function Review if needed

The ISPCP supports the basic possibility of separation through a review as defined and to be fixed in the ICANN bylaws. The threshold to initiate an SR is set high since it presupposes the exhaustion of other escalation mechanisms and methods. In addition the elaboration of criteria to be fulfilled by a potential successor IFO seems to be necessary.

18. Do you have any specific comments or input you would like to provide with regards to section III.A.ii.e. - Framework for transition to successor IANA Operator. This section describes the proposed framework for a transition to a successor IANA Operator to ensure continuity of operations.

see comment to 17.

One important criterion for the potential transition to a successor IFO should be the cost estimate for this successor IFO. E.g. in the FY16 operational budget plan ICANN expects a \$ 2.3 M budget for the IANA department operations. Successor IFO cost estimates should be benchmarked against this figure.

19. Do you have any specific comments or input you would like to provide with regards to section III.A.iii.a. - Proposed changes to root zone environment and relationship with root zone maintainer. This section describes the proposed changes to the root zone environment and the relationship with the Root Zone Maintainer.

The ISPCP support to and the NTIA role regarding TLD change request authorization. In particular we support the CWG recommendation to undertake a study with respect to additional checks and balances.

21. Do you have any specific comments or input you would like to provide with regards to section III.A.iv.b. - IANA Budget. This section describes the recommendations in relation to the IANA Budget.

see comment to 18.

Important for the IANA cost analysis is the ability to benchmark against potential external offers. So full transparency is needed in particular re shared resources and support functions.

Other Comments

44. Are there any other comments or issues you would like to raise for the consideration of the CWG-Stewardship?

In order to make the proposal for the IANA stewardship transition acceptable to the NTIA a clear schedule for the implementation is needed to be included. This schedule is to be coordinated with the other operational communities (CRISP, IANAPLAN) as well as with the CCWG-accountability.

Respectfully submitted

Wolf-Ulrich Knoblen, ISPCP constituency, Vicechair

20 May, 2015