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VIA ELECTRONIC TRANSMISSION
Ms. Theresa Swinehart
Senior Advisor to the President on Strategy
Internet Corporation of Assigned Names and Numbers
Washington, D.C.

Re: Call for Public Input: Enhancing ICANN Accountability

Dear Ms. Swinehart:

Verizon Communications (Verizon) is pleased to respond to ICANN's May 6, 2014 request for comments on enhancing ICANN's accountability. Through our cloud, M2M, global IP and fiber networks, Verizon delivers advanced Internet-based services and technology on a global scale. We deliver secure, reliable service and provide integrated, connected solutions that give customers maximum control over their digital lives, drive business efficiency, and offer communities new tools for solving big challenges like health care, education and sustainability. And, we actively partner with technology and content companies to develop next-generation devices, applications and solutions, creating an innovative ecosystem that will encourage investment in and growth of the Internet.

Verizon and the broader global business community depends upon the security, stability, and reliability of a seamless, global Internet and the effective execution of the technical functions associated with the Internet. The importance of ICANN accountability in this regard has increased as a result of the announcement by the Department of Commerce of the IANA transition. The transition should not occur until there is a concrete plan vetted and approved through ICANN's multi-stakeholder process to ensure the continued security, stability, and integrity of the IANA functions. Clear measures to strengthen ICANN's accountability should be adopted and reflected in the plan for the transition, whatever the specific framework for the IANA functions may be after the transition.

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We urge consideration of certain areas of focus in the accountability discussions:

- A new third-party mechanism for accountability and redress should be created, with independence from ICANN and a meaningful scope of authority.
- Existing mechanisms for accountability should be preserved and made legally binding, such as through a perpetual extension of the Affirmation of Commitments and the reviews that it sets forth, which would be continued with the community at large after the US government phases out.
- Maintaining an environment supported by legal certainty will further provide the business community and others with confidence that ICANN will comply with its mission. Elements for consideration in this respect include ways to strengthen the ICANN bylaws to require a very high threshold of support for any proposed change in policy that impacts ICANN's central mission, and ways to ensure that any decisions regarding ICANN's location do not undermine the applicability of California law to its operations, including the obligations applicable to nonprofits.
- Enhancing transparency into ICANN's policymaking and technical processes, including through use of a FOIA-like process, will improve ICANN accountability as a whole. Similarly, there should be mechanisms for measuring, evaluating and reporting on ICANN's compliance with its obligations to improve accountability.
- As for the IANA transition itself, we note the paramount importance of implementing the conditions set forth by the Department of Commerce in its March 19, 2014 announcement: support the multistakeholder model of Internet governance, maintain an open Internet, meet the needs and expectations of global customers, maintain the security, stability and reliability of the Internet domain name system and not be a government or intergovernmental solution. In addition, if the multistakeholder process ultimately establishes a strong ICANN role with respect to the IANA functions, those functions and the ICANN functions should be subject to a clear separation that is monitored by an independent third party.

We also urge ICANN to recognize fully the important voices of businesses in any evolving ecosystem. As Verizon continues to participate in this important dialogue, we are committed to ensuring consumer and user trust in the Internet as a means of free speech, creativity, innovation, and commerce in a safe and secure environment. We understand the importance of these discussions as part of the larger, ongoing discussions on the Internet governance ecosystem, and look forward to engaging with all stakeholders to continue improvements in this area.

Sincerely,



Jacquelynn Ruff

Vice President

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Verizon Communications