

CCNSO – DRDWG

Consolidated overview of comments on ccNSO DRD WG Issues Analysis Report.

Public Consultation 16 June to 15 September 2010

Version 1

1. Background

On 16 June 2010 the Issue Analysis Report of the ccNSO delegation, redelegation and retirement of ccTLDs working group (DRD WG) was published. The objective was to inform and solicit input and comment from the community on the classification methodology developed by the working group and the issues identified and classified using that methodology. To structure the public comments the following questions were raised:

- Is the methodology developed and employed adequate for the purposes of the DRDWG?
- Do the policy statements identified provide an adequate baseline to evaluate the actual practices of IANA and the ICANN Board relative to delegation, redelegation and retirement of ccTLDs?
- Are there other policy statements which are applicable to the work of the DRDWG? Should they be included in the baseline?
- Does the documentation identified provide an adequate representation of the actual practices of IANA and the ICANN Board relative to delegation, redelegation and retirement of ccTLDs?
- Should other cases be included for analyses?
- Is there other documentation which is applicable to the work of the DRDWG which should be analyzed?
- Was the methodology properly applied to the cases?

The public comments period closed on 15 September 2010.

During this period 9 submission by 6 individuals were received, including one spam, leaving 8 submissions by 5 individuals to be considered. All submissions are archived at:

<http://forum.icann.org/lists/drd-analysis-report/>.

In the balance of this paper the comments will be summarised and categorised by question raised above and an indication provided how the working group will deal with the issue raised by the submission. The name, affiliation and date of submission is included in Annex A.

Overall the comments were positive and no general concern or question was raised.

Question 1. Is the methodology developed and employed adequate for the purposes of the DRDWG?

Comments:

E. Diaz: It seems to be adequate but convoluted.

Y Demchenko: It is simple but seems to be adequate. The balance is found to present information in a neutral unbiased way.

E Brunner-Williams: The methodology developed and employed by the DRD WG was not adequate to inform the DRD WG of a redelegation made consequent to an act of war.

Consideration of comments:

The comments are noted by the working group. With regard to specific suggestions see consideration of comments for question 3, 4, and 7.

Question 2. Do the policy statements identified provide an adequate baseline to evaluate the actual practices of IANA and the ICANN Board relative to delegation, re-delegation and retirement of ccTLDs?

Comments:

E. Diaz: Yes, however if IANA is directed by its own set of by-laws similar to what ICANN has, they should have been included as part of the analysis.

Y Demchenko: In the report there is a good analysis and reference to RFC1591 and ICP1, but there is no summary and analysis what impact the GAC principles did make on the IANA and ICANN decisions and practices.

E Brunner-Williams: The policy statements in RFC 1591 do provide an adequate baseline to evaluate the actual practices of the IANA and ICANN Board relative to most delegation, redelegation and retirement of ccTLDs, except the one, and potentially others, arising from an act of war.

Consideration of comments:

The comments are noted by the working group. With regard to specific suggestions see consideration of comments for question 3, 4, and 7.

Question 3. Are there other policy statements which are applicable to the work of The DRDWG? Should they be included in the baseline?

Comments:

E. Diaz: See comments on previous question

Y Demchenko: See suggestion on previous question

E Brunner-Williams: There are other policy statements which are applicable to the work of the DRD WG, specifically those dealing with the relationship of civilian infrastructure and the Geneva Conventions concerning the conduct of States engaged in belligerency.

Consideration of comments:

The working group notes the comment. However it considers policy statements such as the Geneva Conventions out of its scope.

Question 4. Does the documentation identified provide an adequate representation of the actual practices of IANA and the ICANN Board relative to delegation, redelegation and retirement of ccTLDs?

Comments:

E. Diaz: Details about .PR un-approved redelegation should have been included.

E Brunner-Williams: The documentation identified did not provide an adequate representation of the actual practices of the IANA function and the ICANN Board, as the redelegation of .iq (and the earlier nearly redel of .pn) are absent from the report.

Consideration of comments

The working group has and will base its analyses on publicly available documentation. Specific undisclosed documentation has not been taken into consideration. Under the current practices, the correspondence between IANA and the parties involved in either a delegation, redelegation or retirement process is not on the public record and are therefore not considered by the working group.

The suggested cases, the .IQ, .PN and .SH redelegations, will be reviewed and analyzed by the working group.

Question 5. Should other cases be included for analyses?

Comments:

E. Diaz: More non-public details about .PR un-approved redelegation should be included

E Brunner-Williams: Clearly, the .iq case should be included for analysis. Documentation of the .pn redelegation, and the .sh non-delegation, are applicable to the work of the DRD WG and should be analyzed.

Consideration of comments:

See consideration of comments question 4.

Question 6. Is there other documentation which is applicable to the work of the DRDWG which should be analyzed?

Comments:

M. Tasic: The DRD WG should look at and include report from the operator for .YU in the context of its retirement.

E. Diaz: More non-public details about .PR un-approved redelegation should be included

Consideration of comments:

See Consideration of comments under question 4

Question 7. Was the methodology properly applied to the cases?

Comments

Comments:

E. Diaz: Yes, however in a couple of instances, for example Issue Analysis section 2.4.4 where it says in the last sentence : “This is of interest to the DRDWG. ” there should be a definition or clarification as to what this statement means.

Consideration of comment:

The working group has and will review the terminology it uses in its reports in order to be as clear as possible. The suggestion will be taken into consideration.

Annex A Names and affiliation related to submissions.

Jéssica Calvo,
Administrator NIC Costa Rica,
National Academy of Sciences
Submission received 14 September 2010

Mirjana Tasic,
YU admin contact and caretaker for 15 years,
RS admin contact for 2 years
Submission received 23 August 2010

Eduardo Diaz,
ISOC-PR
Submission received 13 September 2010 (Part I and Part II)

Yuri Demchenko,
Consultant to the Fund of Internet Development (Russia) .SU PDP Project
Submissions received 13 September 2010, 14 September 2010 and 15 September
2010

Eric Brunner-Williams
No Affiliation mentioned
Submission received 15 September 2010