CWG-Stewardship
Cross Community Working Group to Develop an IANA Stewardship Transition
Proposal on Naming Related Functions

**Danish Comments on the 2nd Draft Proposal of the Cross Community
Working Group to Develop an IANA Stewardship Transition Proposal on
Naming Related Functions**

Denmark would like to thank for the opportunity to provide comments regarding the IANA Stewardship Transition Proposal on Naming Related Functions (Transition Proposal). We would also like to take the opportunity and sincerely thank the CWG Stewardship and all people involved for the hard work undertaken to develop the Transition Proposal. Here are our preliminary comments:

Denmark welcomes the decision by the NTIA to transition the stewardship of the IANA functions to the global multistakeholder community and to completing the transition in a timely and responsible manner.

We would like to reiterate our strong support for the globalization of the internet governance mechanisms, including the IANA functions on the basis of the multistakeholder model, while safeguarding the security, stability and resiliency of the DNS. Moreover, it should be a priority to encourage and facilitate truly global participation – also beyond the ICANN realm – in order to ensure that both process and outcome of the transition is inclusive, transparent and accountable.

As regards the proposed set up for the Post Transition IANA (PTI), we agree that the day-to-day operations, including the Customer Standing Committee (CSC), should be carried out by the customers. We also believe that governments' legitimate responsibility with regard to public policy concerns should be taken duly into account and as such should be given appropriate weight in the proposed multistakeholder reviews concerning the IANA Function, including the IANA Function Review (IFR).

Moreover, Denmark strongly believes that it is of crucial importance to maintain the possibility to separate the PTI from ICANN. We see this 'separability' as a necessary part of a legitimate and accountable IANA transition plan. The structural and legal separation of the IANA must be real and implementable with a clearly defined and described process, including what initiates the process to separate the IANA from ICANN and the steps as to how it will be carried out. In addition, there are other fundamental issues to ensure, i.e.: clearly defined contract relations, a strict division of policy and implementation with regard to the operations of the IANA Function, and a separate budget for the PTI.

As an overall principle, transparency is essential for the operations of the IANA Function and we would like to underline the importance of publishing all changes to the root zone and the related requests and decisions immediately.

With regard to ccTLD delegation/redelegation, we have taken note of the decision by the CWG Stewardship not to develop an appeals mechanism for ccTLD's and that this issue has been deferred to the ccNSO/Framework of Interpretation Working Group. In this regard, we would like to emphasize the importance of adhering to applicable national legislation, where such legislation exists, on issues related to the technical coordination of the IANA function.

We also understand that the role of the Root Zone Maintainer is not within the scope of the CWG Stewardship. However, we do believe that this issue should be addressed within the final IANA transition plan.

Furthermore, it is important to continue the tight coordination between the CWG Stewardship and the CCWG Accountability to ensure there is a joint focus on addressing the outstanding issues and dependencies that exist between the two groups' proposals.

We are looking forward to receiving one coherent transition plan for the IANA functions from the ICG in due time.

Denmark is committed to participating in developing an accountable and multi-stakeholder-based proposal for the IANA transition process together with the global internet community.

Yours sincerely,

Finn Petersen
Director of International ICT Relations