

09 September 2016

Samantha Eisner  
Associate General Counsel  
ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094

Re: Draft Naming Function Agreement between ICANN and PTI – Comments from the Cross Community Working Group to Develop an IANA Stewardship Transition Proposal on Naming Related Functions (“CWG-Stewardship”)

Dear Ms. Eisner,

We write in response to the Internet Corporation for Assigned Names and Numbers’ (“ICANN”) recent publication of the draft Naming Function Agreement between ICANN and , and Public Technical Identifiers, a California nonprofit public benefit corporation (“PTI”) (“Draft Naming Function Agreement”). We have prepared this comment letter on behalf of the CWG-Stewardship in our capacities as its co-chairs. We kindly request that ICANN address the CWG-Stewardship’s comments in the revised versions of the Draft Naming Function Agreement.

Our substantive comments on the Draft Naming Function Agreement are reflected in the mark-up of such agreement attached as Exhibit A.

The CWG-Stewardship has prepared the attached comments based on a series of calls (the transcripts of which can be found at: <https://community.icann.org/display/gnsocwgdstwrdsHP/Meetings>), as well as based on input from our external legal counsel, and discussions with ICANN.

Thank you for your consideration of the CWG-Stewardship’s comments on the draft Naming Function Agreement. We look forward to working with you to address these matters.

Sincerely,

Lise Fuhr and Jonathan Robinson  
Co-chairs, CWG-Stewardship

Attachments

**Exhibit A**

*See attached.*