

**IANA Stewardship Transition Coordination Group (ICG) Proposal
NTIA Criteria Assessment Chart**

Names

In the chart below, NTIA analyzes the domain name (names) portion of the ICG proposal against a series of questions developed by NTIA and other U.S. government agencies. The questions are meant to build on NTIA’s March 2014 stated criteria for the transition proposal with the purpose of assisting in determining whether and how the proposal addresses them.

- Key:**
-  **Criteria Component Met**
 -  **Criteria Component Partially Met**
 -  **Criteria Component Not Met**

Process Used for Proposal Development

Component	Assessment	Justification	Citations	Notes
Have all stakeholder groups been consulted, including those who may not be deeply involved in the immediate ICANN community?		Yes. The names proposal was developed via an ICANN Cross Community Working Group (CWG) chartered by the GNSO, GAC, ccNSO, ALAC, and SSAC – each of which appointed members. Further, the CWG invited all interested in the work to participate. The CWG conducted multiple public meetings, consultations, webinars, presentations, and other mechanisms by which to engage stakeholders.	ICG Proposal: Pg 74, paras 1220--1224 Pg 75, paras 1228--1232 Pg 76, paras 1233-1240 Pg 78, paras 1249-1254 Pg 79, paras 1255-1262 CWG-Stewardship Charter: https://community.icann.org/display/gnsocw+gdtstwrdsdp/Charter	

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<p>Were clear opportunities and timelines for engagement provided during the development of the proposal?</p>		<p>Yes. Meeting announcements and agendas were made readily available in advance of meetings. A Wiki page was created and publicly available with a meetings page that had relevant details on conference call and meeting schedules. Announcements and Wiki included details for participants and observers to attend remotely via telephone and/or Adobe Connect.</p>	<p>ICG Proposal: Pg 78, paras 1253-1254 Pg 79, paras 1255--1258 CWG-Stewardship Wiki page: https://community.icann.org/display/gnsocw+gdtstwrdsdp/CWG+to+Develop+an+IANA+Stewardship+Transition+Proposal+on+Naming+Related+Functions</p>	
<p>Is the proposal reflective of a broad community-supported, practical, and workable plan for transitioning the USG unique role?</p>		<p>Yes, the proposal is reflective of broad community support and represents a workable and practical plan for transitioning NTIA's stewardship role.</p> <p>The names proposal went through a number of iterations based on public consultation and feedback. The final proposal was a result of the CWG comprised of 19 members, 133 participants, and a team of legal advisors over the course of 100 calls and meetings, two public consultations, and more than 4,000 emails. Each of the chartering organizations (GNSO, GAC, ccNSO, ALAC, and SSAC) signed off on the proposal with no dissenting views tabled. The names proposal was also put out for public comment by the ICG as part of the combined proposal. While there were questions asked and concerns posed, the majority of commenters expressed clear support.</p> <p>While more complex than the proposal for the numbers and protocol parameter functions, the names proposal is practical and workable from</p>	<p>ICG Proposal: Pg 6, para x017 Pg 25, paras 79-82 Pg 79, paras 1261-1262</p>	

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		<p>NTIA’s perspective. The plan proposes no significant changes to current technical operations and the proposed approaches to ensure accountability, acceptable performance, and separation of policy and operation are consistent with and often exceed those currently in place under the IANA functions contract.</p> <p>The ICG’s assessment also concludes that the names proposal is individually and collectively (with numbers and protocol parameters) workable.</p>		
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NTIA CRITERIA

I. Support and Enhance the Multistakeholder Model

Component	Assessment	Justification	Citations	Notes
Does the proposal support and enhance the multistakeholder model?		<p>Yes, the proposal supports and enhances the multistakeholder model.</p> <p>The names proposal relies on the multistakeholder model, utilizing the existing policy stakeholder groups and advisory committees within ICANN for continued names policy development. The proposal reinforces and enhances the multistakeholder model by keeping policy development separate from the IANA operations and focusing on the needs of the operational community by establishing transparent and direct control over the Post Transition IANA (PTI). Specifically, ICANN will be responsible for oversight of PTI supported</p>	<p>ICG Proposal: Pg 26, para 84 Pg 70, para 1199</p>	

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		<p>by the Customer Standing Committee (CSC) and IANA Function Review (IFR) Team, the latter being a multistakeholder entity. Both the CSC and IFR Team include non-ICANN participants. The CSC and IFR Team escalation mechanisms are based on transparent and open processes and multistakeholder decisions.</p> <p>The ICG in its assessment agrees that the names proposal maintains the existing multistakeholder framework in place today for the names related function and reinforces the multistakeholder model by retaining functional separation between policy development and IANA operations.</p>		
Does the proposal reflect input from stakeholders? Do stakeholders support the proposal?		Yes, the proposal reflects stakeholder input and stakeholder support the proposal. The CWG conducted two rounds of public comment. The first, in December 2014, resulted in a major reconsideration of the CWG’s proposed “Contract Co.” approach. Due to community input, the CWG ultimately agreed to the PTI approach to address accountability and maintain a strict separation of policy and operation. Following a second comment period ending in May 2015, the CWG further refined the proposal, taking into account the public comment analysis. In June 2015, all chartering members of the CWG signed off on the proposal and no dissenting views were tabled.	ICG Proposal: Pgs 75-77, paras 1229-1251	
Does the proposal replace the USG role with one that is dominated or controlled by		No, the proposal does not replace the USG role with one that is dominated or controlled by governments or intergovernmental institutions. Specifically, the NTIA Root Zone Authorization	ICG Proposal: Pg 29, para 100 Pg 72, para 1211	The CSC as proposed would allow a GAC liaison to be appointed if the GAC chose to do so. The IFRT would include

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governments or intergovernmental institutions?		<p>role is proposed to be eliminated and not replaced.</p> <p>The role performed by NTIA in “approving” any architectural changes to the root zone is replaced by the creation of a multistakeholder process that will not be led by governments or intergovernmental institutions.</p> <p>IANA contract oversight and administration will now be performed by the CSC and IFR, which will be comprised of representatives from the multistakeholder community.</p>		<p>one GAC representative. Also, the ccTLD community is allocated a total of two members, which hypothetically could be governments if that is how the ccTLDs are operated. Despite this, the structure would not allow dominance of governments in the structure though they would have a role to play.</p>
Does the proposal build in protections against unilateral changes (to the root zone file, protocol parameters, etc.) that are not pursuant to publicly-documented and stakeholder-accepted procedures?		<p>Yes, the proposal builds in protections. No changes are proposed to the root zone management workflow process as currently performed by ICANN. Therefore, ICANN, acting in the capacity as the IANA Functions Operator (IFO), will continue to rely on policies developed by the community, and existing process and procedures for making changes to the root zone file.¹ The CWG also proposes to carry over a number of provisions from the existing IANA functions contract that spell out how and when the IFO is to follow and adhere to existing community-developed policy frameworks.</p> <p>The NTIA authorization role is to be removed and not replaced. However, additional accountability and transparency is to be built in, including oversight of PTI performance by</p>	<p>ICG Proposal:</p> <p>Pg 50, para 1105</p> <p>Pg 55, paras 1129-1130</p> <p>Pg 56, para 1140</p> <p>Pg 59, paras 1149-1150</p> <p>Pg 60, paras 1151-1155</p> <p>Pg 61, paras 1156-1158</p> <p>P1. Annex E: IANA Contract Provisions to be Carried Over Post Transition, pgs 91-92</p> <p>P1. Annex R: Evaluation Method for Implications, pgs 137-141</p>	<p>NTIA’s root zone authorization role was discussed at length by the CWG Design Team-D on Authorization. The group concluded that the role performed by NTIA “adds little to the security or accuracy” of the process.</p> <p>See: https://community.icann.org/display/gnsocwgdt+stwrshp/DT-D+Authorization?preview=/52892887/53282383/Design%20Team%20%20report%20v1.docx</p>

¹ The IFO reference is used here to clearly articulate the difference between IANA operations and ICANN as the broader organization responsible for naming related policy.

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		<p>the CSC, periodic IANA function reviews by the community, and dispute resolution mechanisms. Further, by maintaining policy separation between ICANN and the PTI, ICANN has existing accountability mechanisms in place to hold PTI accountable for not following policy and/or taking unilateral action.</p> <p>No changes can be made to the root zone management architecture and operation without a similar review and approval function as currently provided by NTIA. A new multistakeholder body will be created (referred to as the Root Zone Enhancement Review Committee, or RZERC) prior to the transition to serve this purpose. RZERC will be comprised of representatives from SSAC, RSSAC, ASO, IETF, GNSO, and ccNSO. The RZERC will be responsible for seeking out expertise and participation from relevant bodies, to conduct public consultations, and conduct their proceedings transparently. Therefore, ICANN will not be in a position to take unilateral action when it comes to making architectural changes to the root zone management system.</p>		<p>The CWG also conducted an evaluation of how removing NTIA’s authorization role could possibly impact security and stability of the DNS and they rated it a “2,” which is a minor impact.</p>
<p>How is accountability addressed? Does the proposal provide adequate checks and balances to protect against capture?</p>		<p>The CWG proposes the creation of PTI, which will perform the naming function under contract with ICANN, and the existing ICANN/IANA staff will be transferred to PTI. In doing this, the community can rely on the existing and soon to be enhanced accountability mechanisms within ICANN. The CSC, comprised of customers from the naming community and liaisons from each of the ICANN SOs and ACs, will provide regular</p>	<p>ICG Proposal:</p> <p>Pg 52, paras 1108-1110</p> <p>Pg 53, para 1118</p> <p>Pg 54, paras 1119-1125</p> <p>Pg 55, paras 1126-1130</p>	

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		<p>reviews of performance. The CSC can note problems and escalate them, but cannot institute a separation from PTI. The IFR Team (IFRT) and Special IFRT (SIFRT) will conduct formal reviews as necessary and be composed of an even broader multistakeholder membership. The IFRT and SIFRT can recommend separation, but a separate multistakeholder process, a Separation Cross Community Working Group (SCWG) would be formed (multistakeholder membership not comprising those who participated in previous groups) to make recommendations associated with the issues identified and whether a separation is required. Ultimately, the ICANN Board would make the final determination. If the ICANN Board chooses to not follow the SCWG recommendation, that decision could be subject of an Independent Review Process (IRP) if so sought by the community.</p> <p>Another example of checks and balances is the IANA Customer Service Complaint Resolution Process for the naming related functions. PTI staff is first allowed to address issues after being notified via a complaint ticketing system. Alternatively, or if the issue isn't resolved satisfactorily, the ICANN Ombudsman or similar service can assist in resolving problems using Alternative Dispute Resolution techniques. The CSC would also be notified to determine if this is a persistent performance issue and, if so, seek remediation from the IANA problem resolution process. Should that problem resolution process work its way out using all</p>	<p>Pg 56, para 1140</p> <p>Pg 57, paras 1141-1143</p> <p>P1. Annex F: IANA Function Reviews- Statement of Work Duration and Review Periodicity, pgs 93-100</p> <p>P1. Annex G: Proposed Charter of the Customer Standing Committee (CSC), pgs 101-106</p> <p>P1. Annex I: IANA Customer Service Complaint Resolution Process for Naming Related Functions, pgs 110-111</p> <p>P1. Annex J: IANA Problem Resolution Process, pg 112</p> <p>P1. Annex J-1: Escalation Mechanisms Flow Charts, pgs 113-115</p> <p>P1. Annex L: Separation Process, pgs 119-121</p>	

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		<p>escalation vehicles and the ICANN Board refuses to take recommended action, an IRP could then be utilized.</p> <p>NTIA finds that these proposed checks and balances are more than adequate as they exceed what is currently required under the IANA functions contract with NTIA.</p> <p>Further, the proposal minimizes the potential for capture by relying on a contract between ICANN and PTI that articulates the roles, responsibilities, and expectations for IANA performance; community-based mechanisms for operational oversight, performance review, and changes to the architecture of root zone management; as well as the overarching reliance upon transparent and open operations and proceedings associated with root zone management.</p>		
<p>Does the proposal ensure transparency? Does the proposal include mechanisms that work to ensure optimal levels of transparency in the performance of the IANA functions? Are they outlined? How will they be enforced?</p>		<p>Yes. The names proposal maintains existing transparency requirements (as articulated in the IANA functions contract) as well as increased transparency in the performance of the naming functions. The development of new and additional Service Level Expectations (SLEs) calls for additional details to be provided by IANA staff related to transaction times for each names-related process. This transparency is intended to provide factual information to assist the CSC, review teams, and the community in its determinations as to whether IANA performance is satisfactory. Provision of this information, identified per SLEs, will be monitored by the CSC as part of its</p>	<p>ICG Proposal:</p> <p>Pg 51, para 1106</p> <p>Pg 56, para 1136</p> <p>Pg 61, para 1158</p> <p>Pg 97, para 1298</p> <p>P1. Annex E: IANA Contract Provisions to be Carried over Post-Transition, pgs 91-92</p>	

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		<p>responsibilities in assessing performance. Persistent failure by the IFO in meeting the SLE could escalate to the point of an IANA Functions Review and also be a consideration in any potential decision to separate.</p> <p>The names proposal also requires the costs associated with the IANA functions operation be transparent, with an itemization of IANA operations costs. Further, the PTI is to have a yearly budget (provided at least nine months in advance) for community review on an annual basis.</p> <p>With respect to making any changes to the root zone management architecture and/or operation (i.e., root zone enhancements) and the relationship with the root zone maintainer, the names proposal specifically identifies transparency as an overarching principle. The names community cites the need to make reports publicly available; that any changes to root zone management be subject to public consultation; and that the IFO generally operate in a transparent manner.</p> <p>The CSC will be required to make minutes of its meetings publicly available within five business days of the meeting and regular reporting of its efforts will be made public. The IFRT will make all mailing lists and meetings open to interested parties, with recordings and transcripts made public, and also seek public comment throughout its reviews.</p>		

II. Maintain the Security, Stability, and Resiliency of the Internet DNS

Component	Assessment	Justification	Citations	Notes
<p>Does the proposal work to preserve a model to perform the IANA functions in a manner that avoids single points of failure, manipulation, and/or capture?</p>		<p>Yes. The names proposal preserves the current root zone management process, outside of removing the NTIA authorization function. The proposal makes no change to the root zone maintainer function (currently performed by Verisign) and proposes that any future proposals to modify the current root zone management approach must be subject to wide public consultation.</p> <p>The proposal maintains existing transparency levels (as indicated in current contract) and proposes enhancements, such as the requirement for the IFO to provide additional details related to transaction times for each root zone change request. These details will assist the CSC and review teams in assessing the IFO’s performance. The CSC is charged with monitoring the IFO’s operational performance, resolving issues with the IFO, and escalating any persistent problems.</p> <p>The separation between names policy development and operations will continue and be further enhanced by creating PTI. All root zone management related staff and operations will be transferred to PTI and ICANN will contract with PTI to be the IFO.</p> <p>The names proposal replaces NTIA’s stewardship role with the combination of ICANN, the CSC, and the IFR. By creating PTI as</p>	<p>ICG Proposal:</p> <p>Pg 29, para 100</p> <p>Pg 52, paras 1108-1110</p> <p>Pg 59, para 1150</p> <p>Pg 61, para 1158</p>	<p>NTIA’s root zone authorization role was discussed at length by the CWG via its Design Team-D on Authorization. The group concluded that the role performed by NTIA “adds little to the security or accuracy” of the process.</p> <p>See: https://community.icann.org/display/gnsocwgdtstwrshp/DT-D+Authorization?preview=/52892887/53282383/Design%20Team%20%20report%20v1.docx</p> <p>The CWG also conducted an evaluation of how removing NTIA’s authorization role could possibly impact security and stability of the DNS and they rated it a “2,” which is a minor impact.</p>

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		<p>an affiliate of ICANN, the community can utilize the accountability mechanisms and safeguards (those already in place and proposed enhancements). The proposal minimizes the potential for capture by relying on a contract between ICANN and PTI that articulates the roles, responsibilities and expectations for IANA performance; community-based mechanisms for operational oversight, performance review, and changes to the architecture of root zone management; as well as the overarching reliance upon transparent and open operations and proceedings associated with root zone management.</p>		
<p>Does the proposal provide mechanisms to preserve the integrity, transparency, and accountability in the performance of the IANA functions?</p>		<p>Yes. The names proposal maintains existing transparency levels (as articulated in current contract) as well as proposes increased transparency in the performance of the naming functions. On the latter point, the development of new SLEs calls for additional details to be provided by IANA staff related to transaction times for each names related process. This transparency is intended to provide factual information to assist the CSC, review teams, and the community in their determinations as to whether IANA performance is satisfactory. Provision of this information, identified per SLEs, will be monitored by the CSC as part of its responsibilities in assessing performance. Persistent failure by the IFO in meeting the SLE could escalate to the point of an IFR and also be a consideration to any potential decision to separate.</p>	<p>ICG Proposal:</p> <p>Pg 51, para 1106</p> <p>Pg 56, para 1136</p> <p>Pg 61, para 1158</p> <p>Pg 97, para 1298</p> <p>P1. Annex E: IANA Contract Provisions to be Carried over Post-Transition, pgs 91-92</p> <p>P1. Annex F: IANA Function Reviews-Statement of Work Duration and Review Periodicity, pgs 93-100</p> <p>P1. Annex G: Proposed Charter of the Customer Standing Committee (CSC), pgs 101-106</p>	

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		<p>The names proposal also requires the costs associated with the IANA functions operation be transparent, with an itemization of IANA operations costs. Further, the PTI is to have a yearly budget (provided at least nine months in advance) for community review on an annual basis.</p> <p>With respect to making any changes to the root zone management architecture and/or operation and the relationship with the root zone maintainer, the names proposal specifically identifies transparency as an overarching principle. The proposal specifically cites the need to make reports publicly available; for any changes to root zone management be subject to public consultation; and for the IFO generally operate in a transparent manner.</p> <p>The CSC will be required to make minutes of its meetings publicly available within five business days of the meeting and regular reporting of its efforts will be made public. The IFRT will make all mailing lists and meetings open to interested parties, with recordings and transcripts made public, and also seek public comment throughout its reviews.</p> <p>The CWG proposes the creation of PTI to perform the naming function under contract with ICANN. In doing this, the community can rely on the existing and soon to be enhanced accountability mechanisms within ICANN. Further, the CSC will provide regular review of</p>	<p>P1. Annex I: IANA Customer Service Complaint Resolution Process for Naming Related Functions, pgs 110-111</p> <p>P1. Annex J: IANA Problem Resolution Process, pg 112</p> <p>P1. Annex J-1: Escalation Mechanisms Flow Charts, pgs 113-115</p> <p>P1. Annex L: Separation Process, pgs 119-121</p>	

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		<p>performance. The IFRT and SIFR will conduct formal reviews as necessary. The IFRT and SIFRT can recommend separation, but a separate group, the SCWG, would be formed to make recommendations associated with the issues identified and whether a separation is required. Ultimately, the ICANN Board would make the final determination. If the ICANN Board chooses to not follow the SCWG recommendation that could be subject of an IRP if so sought by the community.</p> <p>Further, an IANA Customer Service Complaint Resolution Process for the naming-related functions will allow the PTI staff to address issues after being notified via a complaint ticketing system. Alternatively, or if the issue isn't resolved satisfactorily, the ICANN Ombudsman or similar service can assist in resolving problems using Alternative Dispute Resolution techniques. The CSC would also be notified to determine if this is a persistent performance issue and, if so, seek remediation from the IANA problem resolution process. Should that problem resolution process work its way out using all escalation vehicles and the ICANN Board refuses to take recommended action, an IRP could then be utilized.</p>		
<p>Do the affected parties have the opportunity to identify appropriate service levels for the</p>		<p>Yes. The CWG established "Design Teams" to address discrete issues. One team, composed of representatives from the ccNSO, GNSO, and IANA staff, looked specifically at the development of Service Level Expectations (SLEs). The activities and documents of this</p>	<p>ICG Proposal: Pg 56, paras 1133-1138 P1. Annex H: Service Level Expectations, pgs 107-109</p>	

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performance of the IANA functions?		<p>team are all publicly available on the CWG-Stewardship web page. In conducting its work, DT-A developed a framework set of principles, captured the current status quo of root zone management, monitored past performance (historical analysis), and worked towards enhancing and adding on to existing performance measures as currently defined in the IANA functions contract. This includes requiring IANA staff to measure, record, and report additional details of transaction times for each root zone management process. The intent is to add transparency and assist the CSC and Review Teams in their assessments of the IFO's performance. While SLEs are still under development, the above has been made available multiple times for public comment and will be completed prior to the transition.</p>	<p>See also: https://community.icann.org/display/gnsocw+gdtstwrdsdp/DT-A+Service+Levels+Expectations</p>	
<p>Would the management of the DNSSEC root Key Signing Key (KSK) and root DNSSEC operations in general continue in a manner at least as secure as at present? Does the proposal address key rollover?</p>		<p>Yes, DNSSEC KSK management and DNSSEC operations in general will continue to be performed in a secure manner. The names proposal makes no changes to the existing root KSK operations and carries over the existing contract provision C.2.9.2.f-Root Domain Name System Security Extensions (DNSSEC) Key Management and the baseline requirements defined by NIST and NTIA.</p> <p>The proposal does not address key rollover specifically, nor was there any expectation that it would.</p>	<p>ICG Proposal: Pg 63, para 1172</p> <p>P1. Annex E: IANA Contract Provisions to be Carried Over Post-Transition, pgs 91-92</p> <p>IANA Functions Contract: http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf</p>	
Does the proposal recognize that the IANA services must		<p>Yes, the proposal recognizes that the names-related function needs to be secure and stable. The names proposal proposes to carry over the</p>	<p>ICG Proposal: Pgs 13-14, para 23</p>	

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<p>be resistant to attacks (e.g., DoS, data corruption), and be able to recover from degradation, and are performed in a secure legal environment? How does the proposal ensure the IANA functions operator takes into consideration technological advancements and maintains up-to-date physical and network security?</p>		<p>relevant provisions from the IANA functions contract including:</p> <ul style="list-style-type: none"> • C.2.9.2.f – Root Domain Name System Security Extensions (DNSSEC) Key Management, notably its reference to Appendix 2 of the contract (DNSSEC Baseline Requirements) • C.3.1 – Secure Systems • C.3.2 – Secure System Notification • C.3.3 – Secure Data • C.3.4 – Security Plan • C.3.5 – Director of Security <p>The naming function will continue to be performed in a secure legal environment, as PTI will be an affiliate of ICANN and therefore benefit from the stable legal environment available to California-based not-for-profits.</p> <p>The proposal also takes into account the need to address enhancements and/or changes to the root zone management architecture and operations, and outlines a process by which such significant changes are to be reviewed and approved.</p>	<p>Pgs 60-61, paras 1153-1157</p> <p>P1. Annex E: IANA Contract Provisions to be Carried Over Post-Transition, pgs 91-92</p> <p>IANA Functions Contract: http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf</p>	
<p>How does the proposal address NTIA’s root zone change authorization and the root zone maintainer role currently</p>		<p>The names proposal removes the NTIA authorization role, citing that NTIA “adds little to the security or accuracy” of the process. The proposal also calls for a post-transition study to determine whether additional checks and verification is needed, and if so, how to accomplish them.</p>	<p>ICG Proposal:</p> <p>Pg 28, para 95</p> <p>Pg 29, para 100</p> <p>Pg 52, paras 1108-1110</p>	<p>NTIA’s root zone authorization role was discussed at length by the CWG via its Design Team-D on Authorization. The group concluded that the role performed by</p>

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<p>performed by Verisign? Is the security, stability, and resiliency of the DNS maintained and/or otherwise impacted? Are there any national security implications?</p>		<p>The proposal notes that the root zone maintainer role, currently performed by Verisign, is outside the scope of the CWG and ICG process, but also notes its interdependency in root zone management. The proposal does not dictate any specific changes to the root zone maintainer role, but indicates that if any changes to this role are proposed by the IFO post-transition, a thorough community consultation must first take place. In addition to the community consultation, a standing committee of experts would be tasked to assess any proposed change. Further, the ICG and CWG indicate that an agreement needs to be in place between the IFO and the Root Zone Maintainer before the IANA functions contract expires. The ICG specifically states that the agreement, once drafted, needs to be shared with the community prior to execution.</p> <p>The group did a risk assessment of its proposal, which showed the removal of NTIA’s authorization role as having little to no impact on the system.</p> <p>As the names proposal makes no changes to the root zone management process, outside of removing NTIA’s authorization role; the security, stability, and resiliency of the DNS is maintained.</p> <p>There are no known national security implications.</p>	<p>Pg 59, para 1150</p> <p>Pg 61, para 1158</p> <p>P1. Annex R: Evaluation Method for Implications, pgs 137-141</p>	<p>NTIA “adds little to the security or accuracy” of the process.</p> <p>See: https://community.ican.org/display/gnsocwgdtstwrdsdp/DT-D+Authorization?preview=/52892887/53282383/Design%20Team%20%20report%20v1.docx</p> <p>The CWG also conducted an evaluation of how removing NTIA’s authorization role could possibly impact security and stability of the DNS and they rated it a “2,” which is a minor impact.</p>

III. Meet the Needs and Expectations of the Global Customers and Partners of the IANA Services

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Does the proposal maintain a commitment to the continued separation of policy development and operational activities that is subject to periodic robust auditing?		<p>Yes, the proposal maintains the separation of policy and operations. In order to identify and isolate the IANA naming functions both functionally and legally from the ICANN entity, the CWG proposes the creation of a Post Transition IANA (PTI). PTI will be a subsidiary of ICANN. ICANN will contract with PTI to perform the naming IANA functions. All personnel, processes, data, and related resources from the existing IANA department will be transferred to PTI. ICANN will continue to provide funding to PTI, but PTI will be functionally and legally separated from policy development.</p> <p>The names proposal creates the Customer Standing Committee (CSC) to monitor the performance of the IFO and will hold IFO accountable for performing and reporting on an annual security audit, quarterly RZM audit, KSK management related audits, and annual conflict of interest enforcement audit.</p>	<p>ICG Proposal: Pg 50, para 1105 Pg 52, paras 1107-1110 PI. Annex F: IANA Functions Reviews- Statement of Work Duration and Review Periodicity, pgs 99-100</p>	
Are there structures and mechanisms for the adherence to and development of customer service levels, including timeliness and reliability?		<p>Yes, the CWG established “Design Teams” to address discrete issues. One design team looked specifically at the development of Service Level Expectations (SLEs). This team continues to finalize their SLEs that are to include a requirement for the IANA staff to provide additional details related to transaction times for each names related process. This is intended to provide factual information to assist the CSC, review teams, and the community in its determinations as to whether</p>	<p>ICG Proposal: Pg 56, paras 1133-1138 P1. Annex H: Service Level Expectations, pgs 107-109</p>	

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Component	Assessment	Justification	Citations	Notes
		<p>IANA performance is satisfactory. The CSC will monitor the SLEs as part of its responsibilities in assessing performance. Persistent failure by the IFO in meeting the SLE could escalate to the point of an IFR and also be a consideration to any potential decision to separate.</p>		
<p>Are there processes for transparency, accountability, and auditability?</p> <ol style="list-style-type: none"> 1. Are audit and accountability mechanisms considered and meaningful? 2. Are dispute resolution mechanisms considered? 3. Are other periodic reviews considered? If so, how would they function? 4. Will results of reviews be made publicly available? If not, why not? 5. Do proposed reviews, audits, etc. trigger corrections or enhancements 		<p>Yes, there are processes for transparency, accountability, and auditability proposed. As reflected in the CWG “Principles and Criteria that Should Underpin Decisions on the Transition of NTIA Stewardship for Names Functions,” transparency and accountability were cornerstones by which the names proposal was tested and are reflected throughout the names proposal.</p> <p>“Auditability” was not a pre-set criterion for the transition, but it has been captured in the names proposal largely in the form of existing audit requirements in the IANA Functions contract that are proposed to be included in the ICANN contract with PTI. These audits have proven effective in the context of NTIA’s oversight to date.</p> <p>Further, the proposal calls for an annual review of the PTI budget and that an implementation group will be established to develop a process for an IANA-specific budget review. The intent of this review is to get better insight into the IANA functions costs, project any new cost elements associated with the transition, and ensure adequate funding is available moving forward.</p>	<p>ICG Proposal:</p> <p>Pgs 53 -55, paras 1118 -1127</p> <p>Pgs 56-57, paras 1140-1141</p> <p>P1. Annex C: Principles and Criteria that Should Underpin Decisions on the Transition of NTIA Stewardship for Names Functions, pgs 87- 89</p> <p>P1. Annex E: IANA Contract Provisions to be Carried Over Post Transition, pgs 91-92</p> <p>P1. Annex F: IANA Functions Reviews-Statement of Work Duration and Review Periodicity, pgs 99-100</p> <p>P1. Annex I: IANA Customer Service Complaint Resolution Process for Naming Related Functions, pgs 110-111</p> <p>P1. Annex J: IANA Problem Resolution Process, pg 112</p> <p>P1. Annex J-1: Escalation Mechanisms Flow Charts, pgs 113-115</p> <p>P1. Annex Q: IANA Budget, pgs 135-136</p>	

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Component	Assessment	Justification	Citations	Notes
<p>when deemed necessary? If not, why not?</p> <p>6. Are mechanisms proposed to prevent, detect, and manage conflicts of interest between ICANN's multistakeholder policy role and its possible role as administrator of the IANA functions? Will these mechanisms be effective and enforceable?</p> <p>7. Does the proposal allow for separability from ICANN?</p>		<p>Accountability comes in many forms throughout the names proposal, including reliance on ICANN's existing accountability frameworks, the proposed creation of PTI and the PTI Board, the creation of the CSC, and the many opportunities for community review. Specific to reviews, the proposal calls for regular IANA Functions Reviews (IFRs), with the first to take place two years after transition and then no less than every five years. A Special IANA Functions Review (SIFR) can be initiated if persistent issues with the naming functions are identified and not resolved through established escalation paths. Results of reviews would be made public and may include public consultation.</p> <p>The CSC is intended primarily to monitor performance and trigger corrections, utilizing an escalation process if necessary. Dispute resolution mechanisms are proposed, including use of the Ombudsman or other alternative dispute resolution techniques. In the unlikely circumstance of persistent issues going through all possible escalation measures, those issues will be directed to the CCNSO and GNSO who will make a recommendation to the ICANN Board. In the even more unlikely event that the ICANN Board does not accept the CCNSO and GNSO recommendation, an IRP could be used.</p> <p>Managing conflict of interest is present in multiple areas of the proposal, including guidelines and criteria for participating in the</p>		

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Component	Assessment	Justification	Citations	Notes
		<p>CSC, review teams, and PTI Board. Further, the names proposal carries over the conflict of interest provisions from the existing IANA functions contract. All of these measures are either self-enforcing, subject to community scrutiny, and/or contractually enforced by the CSC.</p> <p>The names proposal allows for separability. The proposed creation of PTI is intended to create the ability to separate the naming functions should it be deemed necessary by the community.</p> <p>The names proposal replaces NTIA’s various roles with the combination of ICANN, the CSC, and the IFR. By creating PTI as an affiliate of ICANN, the community can utilize the accountability mechanisms and safeguards (those already in place and proposed enhancements) to prevent capture, including by governments. Specifically, the proposal minimizes the potential for capture by relying on a contract between ICANN and PTI that articulates the roles, responsibilities, and expectations for IANA performance; community-based mechanisms for operational oversight, performance review, and changes to the architecture of root zone management; as well as the overarching reliance upon transparent and open operations and proceedings associated with root zone management. In the case of governments, the proposal gives them opportunities to participate in the CSC as a liaison and to</p>		

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Component	Assessment	Justification	Citations	Notes
		participate in the review (including any potential separation focused review) as any other stakeholder. No single stakeholder has the authority or ability to dictate the process(es) or outcome(s).		
Are there processes for periodic assessments of performance and procedural evolutions or improvements, as needed?		Yes, there are multiple processes and mechanisms proposed to make assessments of performance. These are largely found in the creation of the CSC, IFRs, and SIFRs.	ICG Proposal: P1. Annex F: IANA Functions Reviews- Statement of Work Duration and Review Periodicity, pgs 99-100	
Are fees proposed? If so, are the fees based on cost recovery? Are there structures and mechanisms proposed for the agreement and development of a verifiable cost recovery based system? 1. If so, are the fees above cost recovery? In this case, is there a detailed explanation as to why? 2. Will		No fees are proposed. However, if fees are ever contemplated in the future by PTI, contract language is proposed that would ensure that fees would be based on direct costs and resources incurred by PTI and that PTI works with all interested and affected parties to develop a fee structure.	ICG Proposal: P1. Annex S: Draft Proposed Term Sheet, pg 145	

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Component	Assessment	Justification	Citations	Notes
assessment and collection of fee be transparent (published) and subject to stakeholder review, input, and approval?				
Does the proposal maintain the existing limited technical scope of the IANA functions?		<p>Yes, the proposal maintains the existing limited scope of the naming function.</p> <p>Specifically, the names proposal makes no significant changes to the current operation or work flows associated with the naming-related functions.</p>	<p>ICG Proposal: Pg 56, para 1135</p>	

IV. Maintain the Openness of the Internet

Component	Assessment	Justification	Citations	Notes
Does the proposal maintain the impartial and apolitical administration of the IANA functions?		<p>Yes, the proposal maintains the impartial and apolitical administration of the naming function.</p> <p>While the names proposal does not address this issue explicitly, the proposal makes no changes to the root zone management process, maintaining the process that exists today that is reliant upon processes and procedures developed and/or supported by the customers of the function. Further, the proposal enhances the current separation of policy and operations by creating PTI and transferring</p>	<p>ICG Proposal: Pg 50, para 1105 Pg 56, para 1135</p>	

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		<p>IANA operations outside of ICANN (where names policy development takes place). These existing processes and practices, as well as the continued separation of policy and operations, removes the opportunity for ICANN to insert its own impartial or apolitical administration of the naming function. The required strict adherence to community developed process and procedure, as well as the ability for the community to seek redress, prevents ICANN and/or PTI from asserting undue influence in the root zone management process. This includes preventing any undue influence that is potentially politically motivated.</p>		
<p>Does the proposal maintain the inability to use the technical architecture to interfere with the exercise of human rights or the free flow of information?</p>		<p>Yes, the proposal maintains the inability to use the naming architecture to interfere with the exercise of human rights or the free flow of information.</p> <p>The names proposal makes no changes to the current names-related processes and architectures and it specifically states that it “does not contemplate any changes which would in any way affect the openness of the Internet.”</p> <p>The proposal will enshrine in a contract between ICANN and PTI the requirements and customer expectations regarding performance of the naming function, which binds PTI to objectively implement policies and procedures that in effect removes any opportunity for PTI to use the root zone management process for purposes that could potentially interfere with human rights or the free flow of information.</p>	<p>ICG Proposal: Pg 56, para 1135 Pg 72, para 1210</p>	

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<p>Does the proposal address contingency situations?</p>		<p>Yes, the proposal addresses contingency situations.</p> <p>The names proposal will transfer relevant existing contract requirements into the contract between ICANN and PTI. Namely, C.7.2 – Contingency Plan; and C.7.3 – Transition to a Successor Contractor. In doing so, the IFO will be required to maintain a contingency plan and transition plan.</p> <p>Further, the names proposal is largely focused on the CWG-identified principle of being able to separate the naming function from the IFO if necessary. In light of this possibility and ability, the CWG proposes processes by which to determine the need for separation and a framework for transition to be included in the contract between ICANN and PTI to supplement the transition requirement from the existing IANA contract (C.7.3).</p>	<p>ICG Proposal:</p> <p>Pg 58, para 1145</p> <p>P1. Annex E: IANA Contract Provisions to be Carried Over Post-Transition, pg 92</p> <p>P1. Annex M: Framework for Transition to Successor IANA Functions Operator</p>	
<p>Does the proposal acknowledge that, provided a root zone change request satisfies technical and process checks, that there is a presumption of execution? How?</p>		<p>Yes. While the root zone maintainer role was considered out of scope for the transition, the CWG acknowledged the necessity to ensure that root zone change requests are executed. Specifically, the names proposal states that “new arrangements must provide a clear and effective mechanism to ensure that PTI can have its change requests for the Root Zone implemented in a timely manner by the Root Zone Maintainer (possibly via an agreement between the Root Zone Maintainer and the IFO).”</p>	<p>The ICG Proposal:</p> <p>Pg 59, para 1150</p>	
<p>Does the proposal remove subjective decision making?</p>		<p>Yes, the proposal removes subjective decision making. The CWG proposes no changes to the root zone management process and maintains</p>	<p>ICG Proposal:</p> <p>Pg 56, para 1135</p>	

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<p>the greatest extent possible (e.g., reliance upon community developed policies and processes; authoritative lists)?</p>		<p>(and enhances) the separation between the IFO and policymaking. Thus, the existing process by which the IFO simply implements policy rather than determining it ensures objective decisionmaking. Further, the CWG commits to transferring a number of relevant provisions from the existing contract to clarify that policies should be developed by the community, respected, and used by the IFO. Namely, C.1.3 – Working relationship with all affected parties; C.2.7 – Responsibility and Respect for Stakeholders; C.2.9.2.c – Delegation and Redelelegation of a Country Code Top Level Domain; and C.2.9.2.d – Delegation and Redelelegation of a Generic Top Level Domain.</p>	<p>P1. Annex E: IANA Contract Provisions to be Carried Over Post Transition, pg 91-92</p>	
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