July 17, 2018

Honorable David J. Redl Assistant Secretary for Communication and Information National Telecommunications and Information Administration U. S. Department of Commerce Washington, D. C. 20230

Submitted via email to: iipp2018@ntia.doc.gov

Docket No. 180124068-8068-01: International Internet Policy Priorities Notice of Inquiry

Dear Assistant Secretary Redl,

The American Registry for Internet Numbers (ARIN) on behalf of the five Regional Internet Registries: African Network Information Centre, Asia Pacific Network Information Centre, Latin American & Caribbean Network Information Centre, Réseaux IP Européens Network Coordination Centre and ourselves is pleased to submit the following comments in response to your Docket referenced above.

II. MULTISTAKEHOLDER APPROACH TO INTERNET GOVERNANCE D. Should the IANA Stewardship Transition be unwound? If yes, why and how? If not, why not?

The IANA Stewardship Transition should not be unwound.

The IANA Stewardship transition was a product of the Internet's multistakeholder governance process; more specifically, it was the result of specific transition plan that was designed and successfully implemented by the global Internet community. The transition of stewardship over the Internet identifier systems administered by the IANA was conducted in full transparency and to the satisfaction of the US Government via transition plan which the US government both solicited and approved. As such, the transition not only succeeded, but also confirmed and reinforced the legitimacy of the multistakeholder model itself, by demonstrating the ability of the Internet multistakeholder community to engage on significant matters of Internet governance and drive them to successful conclusion.

The IANA Stewardship Transition resulted in a set of changes, agreed by all stakeholders including the US Government, which are complex and interrelated, and that are now fully implemented. Attempting to unwind these changes would entail great cost and complexity and introduce great uncertainty into Internet operations globally. Additionally, proposing unwinding these changes would contradict the expectations and undermine the trust of the very large global group of stakeholders who now regard the IANA Stewardship transition as a very positive accomplishment that helps preserve the Internet as a global resource.

Respectfully,

John Curran

President and CEO

American Registry for Internet Numbers (ARIN)

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