

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

**Numbers**

In the chart below, NTIA analyzes the Internet number resources (numbers) 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?		<p>Yes, all stakeholder groups have been consulted.</p> <p>The customers of the numbers-related IANA function are generally considered not to be in the immediate ICANN community. In light of this, the numbering community organized themselves to develop the numbers proposal. The numbers community conducted an open, transparent, and bottom-up process modeled on existing processes for numbers policy making at the regional and global levels. Proposal development was conducted as two distinct, yet concurrent, phases – 1) regionally through the Regional Internet Registries (RIRs)</p>	<p>ICG proposal:</p> <p>Pg 177, paras 2126--2131</p> <p>Pg 178, paras 2132-2142</p> <p>Pg 179, paras 2143-2156</p> <p>Pg 180, paras 2157 - 2170</p> <p>Pg 181, paras 2171-2182</p> <p>Pg 182, paras 2183-2186</p> <p>Pg 183, paras 2187-2193</p>	

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		and 2) globally through the formation of an Internet Number Community Process known as the CRISP (Consolidated RIR IANA Stewardship Proposal) Team. Discussions were open and transparent, with all discussions archived. The RIR discussions were open to all interested parties.	Pg 184, paras 2194 - 2198	
Were clear opportunities and timelines for engagement provided during the development of the proposal?		<p>Yes, clear opportunities and timelines for engagement were provided.</p> <p>Each of the regional RIRs and the CRISP Team created dedicated web portals/pages for posting advance and archived information on the transition, including dates/information regarding meetings, calls, and public comment/input opportunities.</p>	<p>ICG proposal:</p> <p>Pgs 178 - 183, paras 2135 - 2189</p>	
Is the proposal reflective of a broad community-supported, practical, and workable plan for transitioning the USG unique role?		<p>Yes, the numbers proposal is reflective of broad community support and is a practical as well as a workable approach to transitioning stewardship of the numbers-related function.</p> <p>The proposal is a direct result of numerous meetings, teleconferences, and online dialogue. Two drafts were published for public comment and amended based on input received. The numbers proposal demonstrates that there was clear agreement from the global community as reflected in their lists/discussions. In terms of workability, the proposal makes no changes to the technical or operational methods, so status quo is maintained.</p> <p>The ICG supports this finding in its assertion the numbers proposal reflects community support and that the plan is workable both individually and collectively (when inclusive of the names</p>	<p>ICG proposal:</p> <p>Pg 174, para 2108</p> <p>Pg 188, paras 2191-2193</p> <p>Pg 189, paras 2194-2198</p> <p>Pg 25, para 80</p> <p>Pg 23, para 60</p>	

		and protocol parameters proposals).		
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**NTIA CRITERIA**

**I. Support and Enhance the Multistakeholder Model**

<b>Component</b>	<b>Assessment</b>	<b>Justification</b>	<b>Citations</b>	<b>Notes</b>
Does the proposal support and enhance the multistakeholder model?		Yes, the numbers proposal supports and enhances the multistakeholder model by relying on the existing multistakeholder approaches and processes currently utilized in the provision of the numbering-related functions. Specifically, the numbering community remains empowered with numbers policy development (not ICANN as the IANA functions operator) and the processes for allocating numbers remain unchanged. Further, the proposal gives oversight to the numbering community through a new Service Level Agreement (SLA) contract between ICANN and the RIRs. The proposal also creates a Review Committee to be comprised of “qualified Internet Number Community representatives from each RIR region” with no other restrictions on composition.	ICG proposal:  Pg 170, para 2086  Pg 171, paras 2087 - 2089  Pg 173, para 2093	
Does the proposal reflect input from stakeholders? Do stakeholders support the proposal?		Yes, the proposal reflects input from stakeholders and the stakeholders clearly support the proposal.  The numbers proposal demonstrates that there was clear agreement from the global community as reflected in their lists/discussions.  The processes and mechanisms by which	ICG Proposal:  Pg 25, para 80  Pgs 177 - 183  Pg 184, paras 2194-2198	

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Component	Assessment	Justification	Citations	Notes
		<p>community input and support was attained is well documented and included both regional (via each of the RIRs) and global approaches (CRISP Team).</p> <p>Proposal development included numerous meetings, conference calls, email discussions, and public comment periods conducted regionally as well as through the CRISP Team.</p> <p>Prior to submitting its proposal to the ICG, the CRISP team published two drafts seeking community feedback. Issues were identified during these public comment periods and addressed in proposal revisions.</p> <p>The ICG, in its assessment, also concluded that the proposal has broad community support.</p>		
<p>Does the proposal replace the USG role with one that is dominated or controlled by governments or intergovernmental institutions?</p>		<p>No, the proposal does not replace the USG role with one that is dominated or controlled by governments or intergovernmental institutions.</p> <p>Instead, the customers of the numbers function, the RIRs, take direct responsibility for overseeing performance. The proposal replaces the NTIA role with the RIRs in terms of oversight. The RIRs are nonprofit organizations accountable to their community. While government entities rely on number resources and participate in the RIRs, the RIRs develop policies through multistakeholder processes that do not allow for undue government influence.</p> <p>The ICG agrees with this assessment.</p>	<p>ICG proposal: Pg 29, para 102  Pg 176, para 2123</p>	

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Component	Assessment	Justification	Citations	Notes
<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>		<p>Yes, the numbers proposal builds in protections against unilateral changes in that it proposes no changes to the existing services provided by the IANA functions operator (IFO), and the policy sources (RIRs) remain unchanged. The proposal identifies principles for the SLA that specifically state that the “IANA numbering services operator will merely execute the global policies adopted according to the global Policy Development Process defined in the ASO MOU” and points to the relevant sections in the existing NTIA contract (C.2.4, C.2.5). Therefore, there are protections in place to prevent unilateral changes.</p> <p>The proposal further specifies that any number registry changes would need to be made in an open and transparent manner to the global community.</p>	<p>ICG proposal:</p> <p>Pg 170, para 2086</p> <p>Pg 171, paras 2088 - 2089</p> <p>IANA Functions Contract:  <a href="http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf">http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf</a></p>	
<p>How is accountability addressed? Does the proposal provide adequate checks and balances to protect against capture?</p>		<p>The numbering community proposes that ICANN continue as the IFO via a contract with the RIRs. Therefore, the RIRs will provide oversight and perform accountability functions. The RIRs have also documented their individual accountability and governance mechanisms as part of their proposal development process.</p> <p>As the proposal states: “by building on the existing Internet registry system (which is open to participation from all interested parties) and its structures, the proposal reduces the risk associated with creating new organizations whose accountability is unproven.”</p> <p>The proposed SLA between the RIRs and</p>	<p>ICG proposal:</p> <p>Pg 168, para 2073</p> <p>Pg 170, para 2086</p> <p>Pg 173, para 2096</p> <p>Pg 174, para 2102</p> <p>RIR Governance Matrix:  <a href="https://www.nro.net/about-the-nro/rir-governance-matrix">https://www.nro.net/about-the-nro/rir-governance-matrix</a></p>	

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Component	Assessment	Justification	Citations	Notes
		ICANN, as well as all the associated performance reviews, audits, and reporting requirements represent adequate checks and balances as they are consistent with and even exceed what is currently in place under the IANA functions contract with NTIA.		
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?		Yes, the numbers proposal ensures transparency in that it relies upon the existing transparent, bottom-up, open processes of the RIRs, as they will be the parties contracting with ICANN for the provision of numbering services. The drafting of the SLA contract was conducted in an open and transparent manner. For the SLA itself, the RIRs require that the IFO be obliged to issue reports on transparency as well as commit to existing transparency requirements in the NTIA contract. These include reporting requirements and periodic/regular review of the IFO. A Review Committee will oversee the performance of the SLA and report to the Number Resource Organization (NRO) Executive Committee (EC) on any concerns regarding performance. Failure of the IFO to perform would result in corrective action and, if the community decided necessary, the option to terminate the contract.	ICG Proposal:  Pg 171, paras 2087-2089  Pg 172, paras 2089 - 2092	

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

Component	Assessment	Justification	Citations	Notes
Does the proposal work to preserve a model to perform the IANA functions in a		Yes, the numbers proposal preserves the model to perform the numbers function in a manner that avoids capture, manipulation, and single	ICG proposal:  Pg 168, para 2073	

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<p>manner that avoids single points of failure, manipulation, and/or capture?</p>		<p>points of failure. This is largely because it relies on the existing processes by which the numbering function is performed as well as the policy sources that inform them (i.e., the RIRs).</p> <p>The proposal identifies principles for the SLA that specifically state that the “IANA numbering services operator will merely execute the global policies adopted according to the global Policy Development Process defined in the ASO MOU” and points to the relevant sections in the existing NTIA contract (C.2.4, C.2.5). Further, as numbering policy is developed via the RIRs’ multistakeholder processes, capture and manipulation is not a realistic possibility.</p> <p>A Review Committee will oversee the performance of the SLA and report to the NRO Executive Committee on any concerns regarding performance. Failure of the IFO to perform would result in corrective action and, if decided necessary by the RIRs and the numbering community, the option to terminate the contract.</p> <p>This reliance on existing processes and mechanisms, as well as review enhancements, preserves and strengthens the model under which the numbering services are performed.</p>	<p>Pg 170, para 2086</p> <p>Pg 171, para 2089</p> <p>Pg 172, paras 2089-2092</p> <p>Pg 173, para 2096</p> <p>Pg 174, para 2102</p> <p>IANA Functions Contract:  <a href="http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf">http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf</a></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 numbers proposal relies upon the existing transparent, bottom-up, open processes of the RIRs, as they will be the parties contracting with ICANN for the provision of numbering services. The numbering community further proposes that ICANN</p>	<p>ICG Proposal:</p> <p>Pg 171, paras 2087-2089</p> <p>Pg 172, paras 2089 - 2092</p>	

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		<p>continue as the IFO via a SLA with the RIRs. Therefore, the RIRs will provide oversight and perform accountability functions. For the SLA itself, the RIRs require that the IFO be obliged to issue reports on transparency as well as commit to existing transparency requirements in the NTIA contract. These include reporting requirements and periodic, regular review of the IFO. A Review Committee will oversee the performance of the SLA and report to the NRO Executive Committee on any concerns regarding performance. Failure of the IFO to perform would result in corrective action and, if the community decided necessary, the option to terminate the contract.</p>		
<p>Do the affected parties have the opportunity to identify appropriate service levels for the performance of the IANA functions?</p>		<p>Yes, the numbers proposal is based on the creation and enforcement of an SLA. The RIRs, working openly and transparently with their communities, drafted the SLA, which includes expectations for the handling of number resource requests and making registry data available. The SLA also articulates requirements such as maintaining good security practices and continuity of operations, as well as processes by which to address disputes associated with performance. The SLA will be signed by the RIRs with ICANN as the IFO.</p>	<p>ICG Proposal:  Pg 171 - 172, paras 2087 - 2089</p>	
<p>Does the proposal recognize that the IANA services must be resistant to attacks (e.g., denial of service, data corruption), and be able to recover from degradation? Are the functions performed in a secure legal</p>		<p>Yes, the proposal recognizes that the numbering-related function must be secure and stable. The numbers proposal is based on the development and enforcement of an SLA with ICANN as the IFO. As part of the SLA, ICANN will commit to security, performance, and audit requirements. ICANN will be obliged to periodically issue reports illustrating its</p>	<p>ICG Proposal:  Pgs 13-14, para 23  Pg 171, para 2089  Pgs 175 - 176, para 2116</p>	

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<p>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>compliance. The proposal also points to existing requirements in the IANA functions contract – Sections C.3, C.4, and C.5.</p> <p>Further, the proposal notes that “the existing operational and policy-making structures related to the number registries have served the Internet community well over time, and the Internet Number Community has expressed a strong desire for stability and operational continuity of this critical element of the Internet infrastructure. Accordingly, this proposal suggests minimal changes to existing processes.”</p> <p>The proposal is for ICANN, a not-for-profit organization based in California, to continue to be responsible for the performance of the numbering function. ICANN will subcontract the performance of the numbering function to PTI, an affiliate of ICANN, and therefore subject to the same stable legal environment offered by a California-based not-for-profit.</p>	<p>IANA Functions Contract:  <a href="http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf">http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf</a></p>	
<p>Does the transition proposal propose steps for ensuring a smooth transition that maintains the stability, security, and resiliency of the DNS?</p>		<p>Yes, the numbers proposal takes steps to ensure a smooth transition in that it maintains existing operational and policy sources (RIRs are responsible for numbering policy), thus minimizing any potential for disruption to the security, stability, and resiliency of the DNS during the transition.</p>	<p>ICG Proposal:                      Pgs 175 - 176, para 2116</p>	

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

Component	Assessment	Justification	Citations	Notes
<p>Does the proposal maintain a commitment to the continued separation of policy development and operational activities that is subject to periodic robust auditing?</p>		<p>Yes, the numbers proposal maintains a commitment to continue the existing separation of policy development and operations as it proposes to rely on the existing services provided by the IANA functions operator and the existing policy sources (RIRs). The proposal identifies principles for the SLA that specifically state that the “IANA numbering services operator will merely execute the global policies adopted according to the global Policy Development Process defined in the ASO MOU” and points to the relevant sections in the existing NTIA contract (C.2.4, C.2.5).</p> <p>As part of the SLA, ICANN will commit to audit requirements and is obliged to periodically issue reports illustrating its compliance. The proposal also points to existing audit requirements in the IANA functions contract – Section C.5.</p>	<p>ICG proposal:  Pg 170, para 2086  Pg 171, para 2089  IANA Functions Contract: <a href="http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf">http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf</a></p>	
<p>Are there structures and mechanisms for the adherence to and development of customer service levels, including timeliness and reliability?</p>		<p>Yes. The numbers proposal is based on the development and enforcement of a SLA with ICANN as the IFO. The SLA includes provisions committing ICANN to specific processes and timelines. A Review Committee will oversee the performance of the SLA and report to the NRO EC on any concerns regarding performance. Failure of the IFO to perform would result in corrective action and, if the community decided necessary, the option to terminate the contract.</p>	<p>ICG Proposal:  Pg 171, paras 2087 - 2089</p>	
<p>Are there processes for transparency, accountability,</p>		<p>Yes, the plan proposes processes for transparency, accountability, and audibility for</p>	<p>ICG proposal:</p>	

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<p>and auditability?</p> <ol style="list-style-type: none"> <li>1. Are audit and accountability mechanisms considered and meaningful?</li> <li>2. Are dispute resolution mechanisms considered?</li> <li>3. Are other periodic reviews considered? If so, how would they function?</li> <li>4. Will results of reviews be made publicly available? If not, why not?</li> <li>5. Do proposed reviews, audits, etc. trigger corrections or enhancements when deemed necessary? If not, why not?</li> <li>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</li> </ol>		<p>all parties. The numbering community proposes that ICANN continue as the IFO via a contract with the RIRs. Therefore, the RIRs will provide oversight and perform accountability functions. The RIRs have documented their individual accountability and governance mechanisms and asked the community-based NRO to undertake a review and make recommendations for improvements that may be warranted given the nature of the stewardship transition.</p> <p>As the proposal states: “by building on the existing Internet registry system (which is open to participation from all interested parties) and its structures, the proposal reduces the risk associated with creating new organizations whose accountability is unproven.”</p> <p>The proposal calls for the creation and enforcement of an SLA. This SLA articulates commitments for ICANN to adhere to including audits, reporting, a continued separation of policy and operation. These commitments will reflect the existing requirements under the IANA functions contract (sections C.2.6, C.2.7, C.2.8, C.3, C.4, C.5).</p> <p>The SLA provides that dispute resolution will be resolved through arbitration.</p> <p>On the subject of separability, the proposal indicates no need or plans to do so at this point, but builds in the option should the numbers community decide it needs to in the</p>	<p>Pg 168, para 2073</p> <p>Pg 169, para 2080</p> <p>Pg 170, para 2086</p> <p>Pg 173, para 2096</p> <p>Pg 174, para 2102</p> <p>IANA Functions Contract:  <a href="http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf">http://www.ntia.doc.gov/files/ntia/publications/sf_26_pg_1-2-final_award_and_sacs.pdf</a></p> <p>RIR Governance Matrix:  <a href="https://www.nro.net/about-the-nro/rir-governance-matrix">https://www.nro.net/about-the-nro/rir-governance-matrix</a></p>	

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<p>effective and enforceable?</p> <p>7. Does the proposal allow for separability from ICANN?</p>		<p>future. The SLA will specify the term of the agreement as well as details on termination.</p> <p>A Review Committee will oversee the performance of the SLA and report to the NRO EC on any concerns regarding performance. Failure of the IFO to perform would result in corrective action and, if the community decided necessary, the option to terminate the contract. Activities of the Review Committee will be conducted in an open and transparent manner, and all reports will be published.</p>		
<p>Are there processes for periodic assessments of performance and procedural evolutions or improvements, as needed?</p>		<p>Yes, the proposal creates a Review Committee that will conduct periodic reviews of the IFO and its performance. The Review Committee’s charter articulates that it must act transparently and is charged with making recommendations to the NRO Executive Committee for any actions, including changes and/or improvements.</p>	<p>ICG Proposal: Pg 172 - 173, paras 2091-2093</p> <p>Final Review Committee Charter: <a href="https://www.nro.net/review-committee-charter-final">https://www.nro.net/review-committee-charter-final</a></p>	
<p>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?</p> <ol style="list-style-type: none"> <li>1. If so, are the fees above cost recovery? In this case, is there a detailed explanation as to why?</li> <li>2. Will assessment and collection of fee be</li> </ol>		<p>The numbers proposal does not propose fees, but the SLA specifies that the RIRs will reimburse the IFO for direct costs with a maximum reimbursement of \$650,000 per calendar year.</p> <p>There is no language in the proposal specific to transparency with respect to fee-related efforts, but the RIRs are publicly committed to open and transparent decision making. Further, there are transparency requirements in the SLA.</p>	<p>ICG Proposal: Pg 172, para 2089 Pg 175, para 2112</p> <p>SLA: <a href="https://www.nro.net/sla">https://www.nro.net/sla</a>, at article 5, article 6</p>	

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transparent (published) and subject to stakeholder review, input, and approval?				
Does the proposal maintain the existing limited technical scope of the IANA functions?		Yes, the proposal maintains the existing limited scope as it makes no changes to technical or operational methods in the provision of the numbering functions.	ICG Proposal: Pg 174, para 2108	
Does the proposal maintain the separation of policy development and operations?		Yes, the proposal and the SLA specify explicitly the continued separation of policy and operations.	ICG Proposal: Pgs 170 - 171, paras 2086 - 2089	

**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?		Yes. The proposal makes no changes to technical or operational methods in the provision of the numbering functions. Therefore, the impartial and apolitical administration of the numbering function is maintained.	ICG Proposal: Pg 174, para 2108	
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?		Yes. The proposal maintains the inability to use the numbering function in a manner that interferes with the exercise of human rights and the free flow of information as it makes no changes to current technical or operational methods.	ICG Proposal: Pg 174, para 2108 Pg 176, para 2120	
Does the proposal address contingency situations?		Yes, the proposal addresses contingency situations. The proposal does this primarily in the context of the numbering community's	ICG Proposal: Pg 169, para 2077	

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		<p>objective to permit “separability” from the IFO should it ever be deemed by the community as necessary. It is proposed that in such a case, the selection of a new contractor is to be done in a fair, open, and transparent process that is consistent with applicable industry best practices and standards. Also, in this context, the SLA requires that the IFO provide for an orderly transition of the functions while maintaining continuity and security of operations.</p>	<p>Pg 172, para 2089</p>	
<p>Does the proposal remove subjective decision making to the greatest extent possible (e.g., reliance upon community developed policies and processes; authoritative lists)?</p>		<p>Yes, the proposal removes subjective decision making to the greatest extent possible as it makes no changes to current technical or operational methods. Further, the proposal reaffirms and commits ICANN (as the IFO) to refer to policies developed by the Internet Numbering Community via the global policy development process as defined in the ASO MoU. This will be codified in the SLA between the RIRs and ICANN.</p>	<p>ICG Proposal: Pg 171, para 2089 Pg 174, para 2108  ASO MoU: <a href="https://aso.icann.org/about-the-aso/aso-memorandum-of-understanding/">https://aso.icann.org/about-the-aso/aso-memorandum-of-understanding/</a></p>	