

28 September 2020

RE: IFRT's Recommendation Requiring an IANA Naming Functions Contract Amendment

## Dear ICANN Board:

We write in our roles as the Co-Chairs of the IANA Naming Function Review Team (IFRT). The IFRT has drafted their Initial Report containing four (4) Recommendations. The fourth Recommendation would require an amendment to the IANA Naming Function Contract. Per the Bylaws, Article 18, Section 18.5.d.(a):

"The IFRT may recommend, among other things to the extent reasonably related to the IFR responsibilities set forth in <u>Section 18.3</u>, amendments to the IANA Naming Function Contract, IANA Naming Function SOW and/or the CSC Charter. The IFRT shall, at a minimum, take the following steps before an amendment to either the IANA Naming Function Contract, IANA Naming Function SOW or CSC Charter is proposed:

- (i) Consult with the Board (such consultation to be conducted in parallel with other processes set forth in this Section 18.6(a)) and PTI;
- (ii) Consult with the CSC;
- (iii) Conduct a public input session for ccTLD and gTLD registry operators; and
- (iv) Seek public comment on the amendments that are under consideration by the IFRT through a public comment period that complies with the designated practice for public comment periods within ICANN."

The IFRT has already consulted with the CSC to fulfill (ii); has held a <u>webinar</u>, on 29 September 2020, to inform and seek input from the community, particularly ccTLD and gTLD registry operators (iii); and intends on publishing our Initial Report for public comment. Kim Davies, VP, IANA Services and President, PTI, has regularly attended the IFR meetings as the official PTI Liaison and has substantively engaged on the proposed amendment to the contract on behalf of PTI.

The IFRT submits this letter to the Board to initiate the required consultation with the Board as it relates to the fourth Recommendation.

For background on the recommendation, the IFRT noted that the <u>IANA Naming Functions</u> <u>Contract</u> contained a requirement relating to the formatting of IANA's monthly <u>Root Operations</u> <u>Audit Reports</u> and concurred with the PTI Liaison that this requirement can be considered obsolete.

The IANA Naming Function Contract currently states at Article VII, Section 7.1 (a): Audits:



"Contractor shall generate and publish via the IANA Website a monthly audit report identifying each root zone file and root zone "WHOIS" database change request and its status. The relevant policies under which the changes are made shall be noted within each monthly report. Such audit report shall be due to ICANN no later than 15 calendar days following the end of each month."

In the Initial Report the IFRT writes:

## In the Recommendations Section

The IFRT recommends that in the IANA Naming Function Contract, Article 7, Section 7.1 (a) this statement, "The relevant policies under which the changes are made shall be noted within each monthly report" be removed from the contract. This section refers to the Root Operations Audit Report (<a href="https://www.iana.org/performance/root-audit">https://www.iana.org/performance/root-audit</a>) which is published monthly by PTI. This is a legacy statement from the NTIA contract that is no longer required and implementation of this requirement has long been recognised as being operationally impracticable, ever since the time of the NTIA contract, and the IFRT is satisfied that its continued inclusion in the bylaws adds no value to the reports.

If the Board has any items related to this proposed change that it would like to discuss with the IFRT, we would welcome consultation in writing or through a call. In addition, if any Board members are interested in reviewing the recording of our community webinar on this subject, the link can be found on the homepage of the IFRT's wiki at: https://community.icann.org/display/ifr

After the IFRT considers the public comment and finalizes the Report, the full slate of Recommendations will be presented to the Board for your consideration in accordance with the Bylaws. The IFRT will include for the Board the results of the other consultations on the proposed change to the IANA Naming Function Contract as well as information on how the IFRT considered the inputs received through public comment on all of the recommendations.

Sincerely,

Fred Neves and Tomslin Samme-Nlar IANA Naming Function Review, Co-Chairs