
Public Comment Summary Report

Second IANA Naming Function Review Team (IFR2) Initial Report

Open for Submissions Date:

Thursday, 20 March 2025

Closed for Submissions Date:

Monday, 28 April 2025

Summary Report Due Date:

Thursday, 29 May 2025 (extended from Monday, 12 May 2025)

Category: Reviews

Requester: Review Team

ICANN org Contact(s): ifr2-team@icann.org

Open Proceeding Link: <https://www.icann.org/en/public-comment/proceeding/second-iana-naming-function-review-team-ifr2-initial-report-20-03-2025>

Outcome:

The Public Comment Proceeding for the IFR2 resulted in eight (8) submissions that supported many of the recommendations in the Draft Report and offered valuable considerations for the Final Report and the wider ICANN community.

The IFR2 thanks the contributors for their thoughtful inputs to this Public Comment proceeding. The IFR2 will consider and incorporate the input as it continues its work and develops the Final Report. The response of the IFR2 to each comment and changes to the documents published in this proceeding will be recorded and published as part of the Final IFR2 report. This document provides a summary of the comments received and the team's initial analysis.

Section 1: What We Received Input On

This Public Comment proceeding was conducted on behalf of the IFR2 that sought community input on its Draft Report. The report contained findings and Recommendations in three key areas:

- Presence of specific Domain Name Security Extensions (DNSSEC) policy details in the IANA Naming Function Contract and identifying DNSSEC policy authority
- Transparency and availability of contract amendments
- Frequency of reviews

It also presented several findings deemed 'Incidental.'

The community feedback covered each of these areas and was gratefully received by the IFR2.

Section 2: Submissions

Organizations and Groups:		
Name	Submitted by	Initials
Country Code Names Supporting Organization	Alejandra Reynoso	ccNSO
Customer Standing Committee	Rick Wilhelm	CSC
Registrars Stakeholder Group	Owen Smigelski	RrSG
Non-Commercial Stakeholder Group	Mesumbe Tomslin Samme-Nlar	NCSG
Registries Stakeholder Group	Unnamed	RySG
Individuals:		
Name	Affiliation (if provided)	Initials
Olivier Crepin-Leblond	Individual	OCL
Benson Mugure	STORM Guidance (Mauritius)	BM
George Michaelson	Individual	GM

Section 3: Summary of Submissions

The IFR2 received eight (8) comments on its Draft Report, highlighted in Section 2 above. This section summarizes the feedback received for each of the Recommendations presented in the Draft Report.

Recommendation 1–2: DNSSEC Policy and Practice

The IFR2 received four (4) specific comments supporting Recommendations 1–2 related to DNSSEC Policy and Practice. No commenters stated disagreement with these Recommendations, although RrSG and Benson Mugure both emphasized the need for a community-based approach to identifying the appropriate policy authority.

Recommendation 3: Contract Amendment Transparency

The IFR2 received four (4) specific comments supporting Recommendation 3, which called for increased transparency where the IANA Naming Function contract has been amended. No commenters presented a disagreement with this recommendation. Benson Mugure reiterated the importance of defining feasible procedures.

Recommendation 4: Frequency of Reviews

The IFR2 received six (6) specific comments supporting Recommendation 4. Benson Mugure emphasized the importance of procedural controls related to stalled reviews while the ccNSO identified a similar Recommendation related to the CSC Review, which is pending implementation and will help to mitigate the risk of overlapping reviews.

Incidental Findings

At least one commenter proactively stated support for inclusion of the “Incidental Findings” section and four (4) commenters responded directly to those findings.

- **Incidental Finding 3:** one commenter identified an opportunity for Public Technical Identifiers (PTI) and the CSC to partner on improvements to SLA reporting.
- **Incidental Finding 4:** received responses from three (3) commenters. NCSG stated that it had not observed evidence for confusion relating to complaint escalation. However, ccNSO and CSC identified the potential for confusion with ccNSO suggesting that IFR2 elevate this Incidental Finding to a Recommendation for a review of escalation procedures across ICANN.

Other Comments Received

The IFR2 received other valuable comments that did not relate to the Recommendations included in the Draft Report.

Section 4: Analysis of Submissions

The IFR2 has performed an initial review and analysis of the comments received during the Public Comment period. This section highlights how the IFR2 has initially analyzed the comments received in relation to the individual recommendations made in the draft report. The team will continue to discuss and consider these comments in preparation of its Final Report.

Recommendation 1–2: DNSSEC Policy and Practice

The IFR2 received comments related to a community-based approach to identifying the appropriate policy authority. The IFR2 will continue to consider these comments during the preparation of the Final Report.

Recommendation 3: Contract Amendment Transparency

Commenters were generally supportive of this Recommendation. The IFR2 analysis of the comments indicates that no changes are needed in this section.

Recommendation 4: Frequency of Reviews

There was broad support for this recommendation. The ccNSO suggested aligning the review frequency to that of the CSC Review. While this may be operationally efficient, the IFR2 has determined not to incorporate any wording that might directly address the CSC Review timing as this is out of this team’s scope.

Incidental Findings

There was general support for inclusion of this section and support for the Incidental Findings themselves. With regards to Incidental Finding 4, the ccNSO proposed elevating this to a Recommendation. ICANN can then conduct a review of escalation procedures across the organization. The IFR2 commends the commitment to customer service and process efficiency. However, the IFR2 concluded that such a recommendation would exceed the scope of this review.

Other Comments Received

The IFR2 received comments from George Michaelson and Olivier Crepin Leblond in which they recommended other topics for consideration within the report. While the review team has determined that these items are out of scope for the IFR, the following comments will be passed on to relevant authorities:

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- Practices related to the Hardware Security Module and the resulting security of the DNSSEC trust anchor.
 - Monitoring and community engagement related to IANA Intellectual Property Rights Agreements

Section 5: Next Steps

The IFRT2 will continue to discuss this feedback and incorporate the input into its Draft Report, where relevant, or pass on comments to the appropriate bodies. After completing the work, the team will submit its Final Report to the ICANN Board of Directors for consideration.