ccNSO Council Submission PTI/IANA Governance Proposal

05 July 2023

In response to the request for public comment on the proposed Public Technical Identifiers (PTI) Bylaws amendment to reduce complexities and improve the alignment of the PTI-related planning processes with the overall ICANN planning process, the Country-Code Names Supporting Organization (ccNSO) Council appreciates and welcomes the steps both the ICANN and PTI Boards as well as PTI staff are taking to consult the IANA Naming Service direct customers and others on the proposed Bylaw changes. This submission only reflects the views of the ccNSO Council and was adopted as such in accordance with the Guideline: ccNSO Statements (2016).

In our submission we will first make a general observation and then provide a comment on the proposed Bylaw changes.

General observation

From the perspective of the ccNSO Council the continuous, uninterrupted high level services of the IANA function to the ccTLD and broader community is the most critical aspect of ICANN: "IANA comes first". If there is an ICANN budget or other constraint, it should only affect the IANA Services in the last and final instance. As noted in the background section of the public comment forum¹, this flows directly from the IANA Stewardship Transition. It is reflected in the current Bylaws of both ICANN and PTI, which contain safeguards on the separation of ICANN and PTI, whilst maintaining ICANN's obligation to fund the IANA functions.

Although the proposed Bylaw changes do not appear to affect this basic principle, the ccNSO Council would strongly support assurances and explicit confirmation by PTI that the safeguards on the separation of ICANN and PTI and ICANN's obligation to fund the IANA functions are maintained as basic principles and are not affected.

On the proposed Bylaw changes

From a ccNSO Council perspective the proposed amendments and the reasons are clear and reasonable. A better alignment of the ICANN and PTI planning processes, both operationally and strategically, would enhance transparency of the interdependency of these processes and make the processes more effective and efficient. The changes appear to make it easier for the community to engage with this process, which is a positive change.

On behalf of the ccNSO Council, best regards,

Alejandra Reynoso Chair

¹ https://www.icann.org/en/public-comment/proceeding/pti-iana-governance-proposal-16-05-2023