

## **CSC Comment 2<sup>nd</sup> IANA Naming Function Review Team (IFR2) Initial Report**

Date 28 April 2025

The Customer Standing Committee (CSC) appreciates the opportunity to provide comments on the Second IFR Initial Report.

The CSC has reviewed the Initial Report keeping in mind the mission of the CSC, which - according to its 2018 Charter - is to ensure continued satisfactory performance of the IANA function for the direct customers of the naming services. The CSC is responsible for monitoring Public Technical Identifier's (PTI) performance of the IANA naming function against the service level expectations in the IANA Naming Function Contract. Consequently, the CSC has closely followed the Second IANA Function Review (IFR2).

Please note that the views expressed in this comment do not represent and should not be interpreted as comments from any of the organizations appointing members or liaisons to the CSC.

We note the timely completion of the Initial Report and appreciate the efforts of the Review Team for their efforts.

The CSC supports the recommendations contained in the Initial Report. In particular, we would like to highlight the following Findings and Recommendations:

- Recommendation 4 (see Section 2.3.1), which relates to the Frequency of Reviews. The CSC agrees that adjusting the frequency of the IFR would improve the effectiveness of the IFR by allowing the impacts of changes related to the prior review to be observed before the subsequent review begins.
- Incidental Finding 3: SLA Reporting (see Section 2.4.3) - The CSC appreciates the IFRT's findings with respect to PTI performance and fully supports the observations with respect to the impact of external factors on PTI's SLA achievement. The CSC wants to note that for that matter the CSC and PTI jointly are updating the SLA amendment procedure, which after adoption, would allow PTI and the CSC to identify and address the kind of exceptions systematically. In the past PTI and CSC have amended some of the original SLA to address the kind of issues the IFRT has identified.
- Incidental Finding 4: Ombuds (see Section 2.4.4) - Additionally, the CSC also agrees with Incidental Finding 4. We agree that Article 8 of the IANA Naming Function Contract, which includes a role for the ICANN Ombuds in the event that a complaint is not resolved by the initial process within the CSC, as described in the Initial Report, has not led to operational problems. We also agree, however, that defined structure for complaints might result in confusion. Therefore, we fully support that the subsequent

Accountability and Transparency Reviews (ATRT) or any other review or effort is advised to explore this topic further.

For the record we note that although the CSC is informed complaints have been made, the procedure is NOT “within the CSC, as described in the Initial Report”, but within PTI. The CSC is not mandated to be directly involved in the resolution of individual complaints.

On behalf of the CSC

Rick Wilhelm, chair

Hiro Hotta, vice-chair