

The Number Resource Organisation (NRO) submits this statement in response to the call for comments by Cross Community Working Group on Enhancing ICANN Accountability (CCWG-Accountability.)

The CCWG-Accountability requested community feedback on its on the [2nd Draft Proposal](#) of proposed enhancements to ICANN's accountability framework it has identified as essential to happen or be committed to before the IANA Stewardship Transition takes place.

Three questions were provided by the CCWG as framework to assist with preparing and providing feedback; these questions (along with the NRO response for each) follow:

1. Do you agree that the CCWG-Accountability proposal enhances ICANN's accountability?

As noted by the Sidley Austin LLP and Adler & Colvin **High Level Review of Jones Day Analysis re CCWG Second Proposal** of 1 September 2015, the proposed “Community Mechanism as Sole Member” model is untested when considered at this point in time. As such, it is not possible to determine if the proposal would enhance ICANN’s accountability to the Internet community, as there does not appear to be period for its testing and evaluation prior to NTIA IANA Stewardship transition.

While other accountability models which have been considered are also largely untested, we observe that the “Sole Member” model involves more extensive changes to ICANN structure than certain other models. Therefore the need for testing of the model, and the uncertainty about its success as an accountability model, must both also be greater in case of the “Sole Member” model.

2. Are there elements of this proposal that would prevent you from approving its transmission to Chartering Organizations?

The Internet numbers community will be relying predominantly upon contractual measures for ICANN accountability, and as such has no fundamental objection to CCWG proposal, or to any model which preserves our ability to fully implement those measures.

However, we are concerned that the “solution” which is adopted for enhancing ICANN’s accountability before the IANA transition must receive sufficient community support and also be implementable within that timeframe (which at present has a deadline of 30 September 2016). We would be unable to support any model which would not allow, or would put at risk, the successful transition of IANA Numbering Functions by that deadline.

3. Does this proposal meet the requirements set forward by the CWG-Stewardship?

This is a question best addressed by the Internet domain name community; as such, the NRO does not propose an answer for this question.

Further to the comments above, the NRO wishes to express a general preference for the “Designator Model” for enhancing ICANN’s accountability. We believe that that model would achieve the necessary improvement in accountability, and that, requiring less extensive change to the existing structure, it would be more easily and reliably implemented within the transition timeframe.

Finally we would remind the Internet community of the need to carefully set expectations of accountability improvements to a level which is sufficient to allow the IANA transition process to proceed. The chosen accountability model must only provide a reasonable level of confidence that any further needed improvements will be achieved in future, through appropriate community processes.

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