

The ISPCP welcomes the opportunity to provide comments on the IANA Naming Function Agreement.

ISPs and connectivity providers are some of the central consumers of IANA services. Critical to those services are the management of key naming infrastructure and processes. The ISPCP acknowledges and is appreciative of the intense and difficult work that has brought us the current draft of the IANA Naming Function Agreement. We believe that the agreement is consistent with the proposal by the IANA Stewardship Transition Coordination Group from March of this year. We believe that ICANN has done a good job in capturing the key elements and requirements of the ICG draft and that the proposed agreement would be a firm foundation for a transparent and accountable naming function inside IANA.

If the ISPCP community has any concern about the current draft, it is that some parts of the agreement may be over-specified. For instance, our reaction to section 4.9 of the document so strictly specifies the organization and staffing of the naming function, that it would be difficult to meet future requirements as the needs of the naming function changes. It is not a certainty that the naming function will evolve in any particular way, but requiring specific staff with specific skills in specific titles seems to eliminate flexibility for the management of the naming function to meet future needs. We also are concerned that the draft agreement has no provision for the naming function to contract with outside resources to meet strategic or occasional requirements for stakeholders in the naming community.

In summary, the ISPCP is supportive of the adoption of the draft IANA Naming Function Agreement. The ISPCP reiterates its appreciation to the community of volunteers and staff who, through a long and complex process, delivered a draft that meets the needs of the vast majority of stakeholders in the naming community. The ISPCP looks forward to seeing the agreement approved and adopted in the near future.

Sincerely,

The ISPCP Constituency

09 September 2016