

Second IANA Naming Function Review Team (IFR2) Initial Report

NCSG Comments

April 24, 2025

About NCSG

NCSG represents the interests of non-commercial domain name registrants and end-users in formulating the Domain Name System policy within the Generic Names Supporting Organisation (GNSO). We are proud to have individual and organizational members in over 160 countries, and as a network of academics, Internet end-users, and civil society actors, etc, we represent a broad cross-section of the global Internet community. Since our predecessor's inception in 1999, we have facilitated global academic and civil society engagement in support of ICANN's mission, stimulating an informed citizenry and building their understanding of relevant DNS policy issues.

About this Public Comment

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

Our Comment on this subject

We commend the Second IANA Naming Function Review Team (IFR2) for their outstanding efforts in evaluating PTI's performance of the IANA naming function, a critical accountability role in this ecosystem.

NCSG supports all four recommendations and in particular, strongly supports the principles behind Recommendations 3 (Contract Amendment Transparency) and 4 (Frequency of Reviews).

In line with our principles, it is important to NCSG that there is full transparency in contract amendments. Therefore, making any amendments to the PTI contract publicly available is critical, and according to the transparency requirements of the IANA Naming Function contract.

Similarly, we strongly support Recommendation 4 (“amending ICANN Bylaws Section 18.2(b) to read “once every five (5) years, measured from the date that the most recent IFRT submits its Final Report to the ICANN Board of Directors.””), since it is important that the use of volunteers’ time is well managed. We believe ensuring that previous IFRT recommendations are given time to be implemented with sufficient time included to observe their impact by subsequent review teams is a sensible approach.

Regarding Incidental Finding 4: Ombuds, we fail to see the confusion in the complaint escalation process to ICANN Ombuds. As the initial report rightly states, the Ombuds process is only triggered “If the Complaint is still not resolved, the Complainant or the President of Contractor may escalate the matter in writing to ICANN’s Ombudsman.” How then could this be confusing to the complainant?

Summary of Submission

NCSG supports all four recommendations and in particular, strongly supports the principles behind Recommendations 3 (Contract Amendment Transparency) and 4 (Frequency of Reviews).