The Consolidated RIR IANA Stewardship Proposal (CRISP) Team would like to congratulate the CWG-Stewardship on the coordination and efforts that have resulted in the proposal recently published for public comment. We understand and respect the hard work and dedication of the three operational communities in preparing their respective proposals; and the CRISP Team appreciates the opportunity to comment on the CWG-Stewardship's current proposal draft. Our input below will focus on stating the positions found in the Numbers community proposal, seeking clarification from the CWG-Stewardship in potential areas of concern or conflict when comparing the Numbers proposal to the CWG-Stewardship draft proposal, and providing hopefully helpful suggestions as the CWG-Stewardship finalizes its proposal by next month. We are confident that these interactions among the three operational communities will make for a smooth coordination for consolidating into one final proposal that will be submitted to the NTIA.

Please note that this input represents the discussions and analysis by the CRISP Team and is not intended to present all views of individuals in the Numbers community. To encourage input from the Numbers community outside the CRISP Team, we have made a call to the Numbers community to submit comments individually if they wish, just as the CRISP Team would be doing, through the public comments process of the CWG-Stewardship.

The CRISP Team believes it is essential that each operational community be free to make its own independent arrangement with an IANA Functions Operator (IFO) including the ability to choose the IFO itself. This is consistent with the proposal from the Numbers community for the RIRs to enter into a Service Level Agreement (SLA) with an IFO for IANA Numbering Services, as well as establishing a Review Committee to monitor the service level of the IANA Numbering Services. We would like to request that the proposal developed by the CWG-Stewardship not affect these essential components of the Numbers proposal.

We appreciate all due consideration on the part of CWG-Stewardship to develop the proposal related to Names functions with the intention and the spirit of not affecting the proposals which have already been submitted by the other two operational communities.

The CRISP Team finds this to be the most constructive approach for smooth coordination among the three operational communities in future steps, and we look forward to further coordination and communication as needed with the CWG-Stewardship with this understanding in mind.

In this context, the CRISP Team would like to raise a few points that we believe will help clarify our understanding, and on issues which we observe may affect the Numbers community in a manner which would be inconsistent with our requirements.

* ICANN subcontracting Post Transition IANA (PTI) as the IANA functions operator
- It is our understanding that in accordance with the proposed model, the Numbers community can either enter into an SLA with ICANN (which would delegate operation of the IANA Functions to PTI), or directly with PTI as the IFO. In any case it is the SLA that will govern the provision of the IANA numbering services to the community.
- The RIR legal teams need to conduct legal analysis on both options before the Numbers community is able to arrive at a definitive conclusion on this issue. In order to enable thorough analysis, more time is needed beyond the public comment period.

We will coordinate with CWG-Stewardship in the event that we identify any issues which would affect the proposal developed by the CWG- Stewardship.

* PTI Board
- The role and composition of a Board of Directors for the IFO was not identified in the Numbers proposal. Therefore, adding any substantial role for a PTI Board is expected to add further coordination requirements between the Names and the two other operational communities, as well as additional consultations within those other communities.
- Notwithstanding the foregoing, we recognize that if an organization is created that is a subsidiary to ICANN, a Board might well be required by the framework of the organization. The Numbers proposal does not contemplate any model which potentially expands the role of the Board beyond the absolute minimum for organizational framework or requires participation by representatives from the three operational communities to serve on the Board. Therefore, we seek clarification on the CWG-Stewardship's proposal requirements regarding the composition and role of the PTI Board to ascertain whether there is any conflict with the Numbers proposal.

* Budget of the IANA Operations
- We observe a difference in the approach between what is proposed by the CWG-Stewardship and the Numbers community, but we do not observe any material issues of incompatibility at this point.
- The current draft of our SLA defines cost-based fees for the RIRs to pay to the IFO. If this proposed fee structure is adopted, we do not observe the need to provide detailed input on the budget on the IANA operations, as the RIRs will be paying a fee with a fixed maximum amount and it is incumbent on the IFO to manage its funds appropriately to successfully meet its contractual obligations. At the same time, we do not observe issues for the ICANN community to have more powers to provide input on the budget, given it will have no discretion regarding, and not make decisions about, the contracted fees for the IANA Numbering Services defined in the SLA.

* Customer Standing Committee
- We understand the role of the CSC is to review the service level of the Names related IANA Functions. The Numbers community has proposed a separate mechanism for service level review of the IANA Numbering Services. We observe they are independent and do not see any issues so long as this independence is maintained, but we note the possibility of communication between the groups as needed.

* Review Team
- The Numbers community requires no additional reviews or organizational structures beyond the Review Committee that is specified in the Numbers community proposal. The Number community's Review Committee is tasked with monitoring the service levels for the Numbers functions and advising the RIRs accordingly. We therefore propose the scope of the contemplated Review Team to be restricted to the monitoring and review of the Names functions. Otherwise, additional review on the implications of a Review Team will be needed which will unnecessarily require further effort to ascertain if this is consistent with the Numbers community proposal given the numbers community has not identified any needs for an additional team. We support the approach of not making it compulsory for the Numbers community to have representatives on the Review Team assuming the Review Team's scope is limited to only the Names functions. We further support the coordination of efforts of the respective parties from the operational communities when appropriate.

* Intellectual Property Rights (IPR)
- According to our understanding, the CWG-Stewardship proposes the IPR to be transferred to PTI as the IFO. We would like clarification from the CWG-Stewardship on whether the proposal is met by a license granted to PTI to use certain intellectual property, or only if the ownership of the IPR itself is transferred to PTI. If it is the latter, it will create incompatibility with the Numbers proposal, which proposes that the IPR be transferred to the operational communities. The Numbers proposal indicates that the IETF Trust is an acceptable entity to receive the transfer of ownership of the IPR. We are however flexible and open to discuss with the CWG-Stewardship and the IETF on any alternative suggestions for the recipient of this transfer, and we would like to further coordinate on this matter. As a starting point, we have suggested to the CWG-Stewardship Chairs to have a call between the Chairs of the three operational community groups.