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Service Levels for the ccTLD Creation and Transfer Process — Change Analysis

The Internet Corporation for Assigned Names and Numbers (ICANN), Public Technical Identifiers (PTI) and the Customer Standing Committee (CSC) worked together to develop the “[Process for Amending the IANA Naming Service Level Agreements](#)”. This process is a guide for determining SLA changes and provides a method for doing so, with appropriate consultation and agreement levels. It also contains safeguards and mechanisms to ensure that due diligence is followed when making changes to the SLAs. None of the requirements in this process overrides any of the obligations within the IANA Naming Functions Contract.

The process requires that “If the CSC and PTI reach a mutual decision to proceed with the SLA change, PTI should draft a change recommendation, which includes an impact analysis that expands with further detail based on their earlier discussions during the ‘procedure for determining that a SLA needs amending’ stage.” Per this requirement, PTI is providing the following analysis and requests that PTI and the CSC agree to amend the following metric:

- Staff Processing - Validation and Reviews, ccTLD Creation or Transfer Category: This measurement represents the time spent by staff in processing a ccTLD transfer or creation request from beginning to end. It includes the time to review supporting documentation, write a report for review by the ICANN Board and perform all other manual processes associated with each request.

Background Behind Request for SLA Revisions to the ccTLD Creation/Transfer Process:

The ccTLD delegation and transfer process is designed to assign or re-assign a ccTLD to a manager, taking into account a number of technical and public interest criteria. These criteria relate to the basic principles that the manager be a responsible and technically competent trustee of the domain on behalf of the national and global Internet communities. To process such a request, the applicant is asked to supply extensive documentation to demonstrate how the request meets the transfer or delegation criteria. The supporting documentation is then reviewed and analyzed by the IANA team and a report of the findings is sent to the ICANN Board for their review, before the request is implemented and the report is published.

The processing time for this type of request varies greatly from several weeks to several months. Key factors in the process time include how well-documented the request is when first submitted, the overall complexity of the circumstances of the change and the proposed operations, and how quickly any missing or deficient documentation is cured.

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There is currently only one measurement of staff processing time (ccTLD Creation/Transfer - Validation and Reviews) for ccTLD delegation and transfer requests which measures the total time the request is with the IANA team from beginning to end. The current SLA for this metric is 60 days.

The annual volume for this type of request is very low — in any given year there has typically been only a single digit number of completed requests. This infrequency, paired with the high variability of processing times for individual requests, means the monthly averaged metric of staff processing time is not adequate to inform customers about what to expect in terms of request processing times and how they can contribute to faster and successful processing of the request.

The CSC and PTI have previously discussed changing this SLA to be measured differently. Some of the ideas discussed have been to increase the overall target from 60 days to 90 days, measure the data annually instead of monthly due to low volume, or measure performance based on a rolling basis for a longer period such as the last year. After discussing the pros and cons of each, the CSC and PTI determined that perhaps identifying new SLAs that measure these transactions in a totally different manner is necessary.

Synopsis of the Request for New SLAs

In analyzing the data from March 2016 to today, we believe that the current measurement of 60 days is not a true nor representative measure of IANA performance given that this type of request is low volume, highly complex, and extremely varied based on the quality of the request submission. It would be more meaningful to break the manual processing into more discrete steps and focus on measuring performance through new metrics, such as:

- 1) Time for staff to evaluate and respond to each submission of supporting documentation.
- 2) Time to author the delegation or transfer report for review by the ICANN Board of Directors after all materials provided by the requester have been deemed sufficient.
- 3) Counting the number of interactions with the customer as an indication of the quality of the request (to be provided as information only).

Simultaneously, PTI is also working to update the documentation process for these transactions so that metric data can be collected while also rewriting documentation and forms to make it clearer and easier for customers when submitting a delegation or transfer request.

Current and Proposed SLA Thresholds

Summary of current and proposed SLAs for ccTLD transfer and delegation requests:

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Metric	Current SLA	Actual Performance	Proposed SLA adjustment	Explanation
ccTLD Creation/Transfer : Validation and Reviews	100% within 60 days, measured monthly	40-90 days	Remove	Time it takes staff to review and analyze documentation, write the findings report and complete all other staff processes involved in the request from beginning to end.
ccTLD Creation/Transfer : Validation and Reviews after each submission	No current SLA	New SLA	100% within 14 days, measured monthly	Time it takes staff to process the information included in each documentation submission, and respond to the requester describing deficiencies if necessary.
ccTLD Creation/Transfer: Report Creation	No current SLA	New SLA	100% within 21 days, measured monthly	Time it takes for staff to finalize a delegation or transfer report to be submitted for review and publication.
ccTLD creation/Transfer: Number of interactions or clarifications with customer	No current SLA	Informational only	Informational only	Tracks the number of interactions with the customer as an indication of the quality of the request.

Change Category

SLA amendment Category	
X	i. New SLA

X	ii. Remove SLA
	iii. Change to SLA definition and target/threshold
	iv. Change SLA Item target/threshold only

Impact Analysis

The SLA amendment process states that a request to change the SLAs should also include an analysis of “impact on potential resources, budget requirements following the PTI and ICANN budgetary processes, and an implementation plan per the PTI and/or ICANN implementation process, should the SLA changes be approved. Prior to moving forward with the recommendation, the CSC and PTI should agree on how PTI can support the implementation of the draft SLA change recommendation. PTI and/or ICANN shall publicly post the draft SLA change recommendation will be based on, and after impact completion of this analysis.” The following section provides an impact analysis per this requirement:

Benefit to the Community
<p>Accurate SLA metrics help the community determine reasonable expectations for when an activity will be completed. Adjusting metrics to represent the accurate processing time averages that satisfy the naming customer’s requirements will set clearer expectations for customers, reduce the impact of meaningless outliers, and increase our ability to detect real systemic performance issues. A ccTLD creation or transfer request is a critical and complex process that the PTI must execute with the utmost care. Most requests historically have not met the documentation requirements upon the initial submission. Changing the metric to more accurately reflect PTI’s performance by excluding the variability introduced by the customer’s preparedness is expected to better attribute time to the appropriate actors and allow for more precise oversight. It may also reveal how PTI could optimize processes such as with clearer instructions to the requester – so additional work outside just the SLA revisions must also accompany this work.</p>
Feasibility of Implementation

The new proposed SLAs breakdown the staff processing time for a ccTLD creation and transfer process into several measurements. The new metrics cannot be currently measured by the Root Zone Management System (RZMS) but they are in line with processing data PTI is planning to be able to capture in future versions of RZMS. PTI will need time to determine the mechanism for capturing and reporting the data through tracking states in RZMS and perhaps introducing additional tracking tools.

Budget Requirements

Tracking three new measurements for each request requires changes to RZMS as well as the SLE Dashboard and the monthly report. Please refer to the implementation plan section below for more details on future plans for RZMS.

Risk Analysis

No risks have been identified.

PTI IMPLEMENTATION PLAN

Tracking three new measurements for each request requires changes to RZMS as well as the SLE Dashboard and the monthly report. It is estimated that generating the data for proposed SLAs will require a one off development activity of thirty (30) days of one (1) developers' time during an RZMS release cycle.

As this update requires changes to RZMS, and RZMS is currently under significant active development, the implementation must be coordinated with the RZMS development cycles. The next major release of RZMS planned for release in the latter part of 2020. This next release will capture some of the data discussed in this proposal. If these new SLAs are approved, PTI will work to implement the SLA changes in RZMS reporting, the SLE Dashboard and monthly report in a subsequent RZMS release.

NEXT STEPS FOR CATEGORY i. NEW REQUEST

Step	PROCESS REQUIREMENT	STATUS
1.	SLA request distributed to the CSC and PTI	COMPLETE D: This document
2.	Request Analysis (this document qualifies) completed and distributed to the CSC, PTI and ICANN	COMPLETE D: This document
3.	<p>The CSC, PTI and ICANN discuss whether to proceed and one of the entities summarizes the results in writing for all the other parties.</p> <p>Results:</p> <p>If either party decides not to proceed, the process ends, and the SLA is not amended.</p> <p>OR</p> <p>If all parties decide to proceed, continue</p>	Completed 13-Aug-2019
4.	Impact Analysis completed by PTI and posted by PTI/ICANN for community access	In progress: this Document
5.	The CSC socializes SLA Request to their stakeholders	
6.	ICANN opens a Public Comment Period complying with ICANN's designated practice for public comment periods, per the CSC Charter 17.3.d.	
7.	ICANN publishes a Public Comment Report	
8.	Based on the potential degree of impact if the draft SLA recommendation is approved, the CSC may decide to perform additional community consultations such as, but not limited to, open sessions at ICANN meetings, etc.	

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9.	The CSC and PTI discuss all community input and make any changes, completing a Final SLA Recommendation. If one entity now objects to the SLA Change this process ends.	
10.	The CSC seeks approval from the GNSO and ccNSO Councils on the Final SLA Recommendation	
11.	PTI implements the SLA changes in accordance with the implementation plan provided earlier in the process for the final SLA recommendation.	
12.	ICANN and PTI update the SLA Tables on the PTI SLA webpage, upon which the new SLA(s) become effective.	

[NS1]I need to have more discussion with the development team once we know if this SLA change proposal is acceptable to the CSC and the community.