Interim Report

Obtaining and documenting "consent" for ccTLD delegation and re-delegation requests

ccNSO Framework of Interpretation Working Group (FOIWG)

October 2011

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Executive Summary

The Framework of Interpretation Working Group (FOIWG) is seeking public comment on its initial recommendations on the first topic it has addressed: obtaining and documenting consent for delegation and re-delegation requests.

The Final Report of the Delegation Redelegation and Retirement Working Group (DRDWG) identified the following issues with the topic of "consent":

"The Interpretation of consent (communication that the transfer is agreed), by IANA's own admission, is highly variable depending on a number of factors including culture and the immediate physical security of the ccTLD manager. This includes interpreting a failure to reply to an IANA email as consent in certain cases of re-delegations where the current manager has stated he does not support the request."

The DRDWG's Full Report on the "re-delegation of ccTLDs where the incumbent operator does not consent" included the following note in its Introduction: "*Consent means that the incumbent operator appeared to give their agreement, by providing a formal and clearly positive reply, to the requested change to the IANA database. The WG believes that the concepts of consent (voluntary, involuntary and informed) need to be further explored and clarified during the development of the "Framework of Interpretation"*".

As a first step the FOIWG identified the applicable polices and procedure statements and analysed all past cases of ccTLD re-delegations researching the stated consent in each instance. Based on this analysis the FOIWG identified the issues in the context of the applicable policies. These issues were further analysed to identify any issues arising from this analysis.

Based on this analysis the FOIWG developed the following draft recommendations, which in summary1 are:

1. IANA should undertake the steps necessary to implement the following guidelines:

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1   The complete set of recommendations relating to obtaining and documenting consent for delegation and re-delegation requests are included in section D of this report, page 12 and 13.

-	Only seek consent for a re-delegation request from the incumbent manager and the proposed manager.

-	The communication from IANA requesting a party's consent should clearly state (a) what the party is being asked to agree to and (b) what steps IANA will or may take in response to the party's (i) affirmative consent, (ii) affirmative refusal to consent, or (iii) failure to respond to the communication requesting consent.

-	To establish and publish a procedure how it will request a party's consent and document and record the responses on such a request.

-	Adopt specific criteria when evaluating the consent of an incumbent or proposed manager for a re-delegation request or from a proposed manager for a delegation request

-	In order to be effective in communicating relevant information, IANA reports on re-delegations should be consistent and include a documented minimum level of information.

2. IANA should report to the GAC and ccNSO at each ICANN meeting on this plan and progress to date in implementing these recommended guidelines.

3. Should IANA choose not to comply with the FOIWG recommended guidelines for any specific re-delegation, it should provide the rationale for doing so in a public report.

4. Any changes to the FOIWG recommended guidelines should be the subject of a formal public consultation as per ICANN standard procedures.

To be most helpful input and feed-back from the community is sought with respect to the following questions:

1.	Is the approach used by the FOIWG satisfactory?

2.	Is the documentation that was analyzed to identify issues comprehensive?

3.	Do the issues identified by the FOIWG for this topic capture the major problems associated with the topic? If not, what is missing?

4.	Are the proposed guidelines effective solutions to the issues that were identified?

5.	Are the recommendations effective in addressing the concerns raised in the final report of the DRDWG regarding this topic?

A. Introduction

In March 2011 the charter of the ccNSO Framework of Interpretation Working Group (FOIWG) was adopted by the ccNSO Council. According to its charter the FOIWG is to develop and propose a "Framework of Interpretation" for the delegation and re-delegation of ccTLDs. This framework should provide a clear guide to IANA and the ICANN Board on interpretations of the Policy Statements, which are defined in the charter of the WG as the following documents:

- RFC 1591

- GAC Principles 2005

The scope of the FOIWG also clearly specifies that:

- Any proposal to amend, update or change the Policy Statements is outside the scope of the FOIWG.

- The IANA functions contract between the US Government and ICANN, including any contract implementation issues or procedures relating to it, are outside the scope of the FOIWG.

The FOIWG identified the following topics which will be considered individually and in the order presented:

• Obtaining and documenting consent for delegation and re-delegation requests

• Obtaining and documenting support for delegation and re-delegation requests from Significantly Interested Parties (sometimes referred to as Local Internet Community or LIC).

• Developing recommendations for un-consented re-delegations

• Developing a comprehensive glossary of the terms used for the delegation and re-delegation of ccTLDs.

• Developing recommendations for IANA reports on delegation and re-delegation.

The FOIWG is seeking public comment on its initial recommendations on the first topic it has addressed: obtaining and documenting consent for delegation and re-delegation requests.

To be most helpful input and feed-back from the community is sought with respect to the following questions:

1. Is the approach used by the working group is satisfactory?

2. Is the documentation that was analyzed to identify issues comprehensive?

3. Do the issues identified by the working group for this topic capture the major problems associated with the topic? If not what is missing?

4. Are the proposed guidelines effective solutions to the issues that were identified?

5. Are the recommendations effective in addressing the concerns raised in the final report of the DRDWG regarding this topic?

B. Approach

As a first step the FOI WG identified the applicable polices and procedure statements and analysed all past cases of re-delegations with regard to consent. Based on this analysis the WG identified the issues in the context of the applicable policies and procedures. These issues were further analysed including an identification of the issues arising out of this analysis.

C. Identification of Issues and Analysis

1. Background and Introduction

1.1. The Final Report of the DRDWG identified the following issues with this topic:

1.1.1.   Interpretation of consent (communication that the transfer is agreed), by IANA's own admission, is highly variable depending on a number of factors including culture and the immediate physical security of the ccTLD manager.

1.1.2.   This includes interpreting a failure to reply to an IANA email as consent in certain cases of re-delegations where the current manager has stated he does not support the request.

1.2. The DRDWG Report on the re-delegation of ccTLDs where the incumbent operator does not consent included the following note in its Introduction:

1.2.1.   "*Consent means that the incumbent operator appeared to give their agreement, by providing a formal and clearly positive reply, to the requested change to the IANA database. The WG believes that the concepts of consent (voluntary, involuntary and informed) need to be further explored and clarified during the development of the "Framework of Interpretation".*

1.3. Applicability

1.3.1.   Delegation

1.3.1.1.   There were no issues raised by the DRDWG with respect to proposed operator approving the delegation of a ccTLD. The processes and procedures surrounding delegation seem adequate as far as consent is concerned.

1.3.2.   Re-delegation

1.3.2.1.   There were significant issues raised by the DRDWG with respect to IANA reports documenting an operator approving the re-delegation of its ccTLD.

1.3.3.   Retirement

1.3.3.1.   Although there is no policy statement dealing with the retirement of ccTLDs (ISO3166-1 or IDN) the recommendations of the FOIWG on the topic of consent for re-delegation could also apply to the retirement of ccTLDs.

2. Objectives

2.1. Identify applicable polices and procedure statements.

2.2. Analyze all past cases of re-delegations vs. consent and identify issues vs applicable policies and procedures.

2.3. Identify and analyse any issues arising.

2.4. Develop recommendations and guidelines as appropriate.

3. Applicable Policy Statements

3.1. RFC1591

    3.1.1. Section 3 "*The Administration of Delegated Domains*" subsection 6 states: "*For any transfer of the designated manager trusteeship from one organization to another, the higher-level domain manager (the IANA in the case of top-level domains) must receive communications from both the old organization and the new organization that assure the IANA that the transfer in mutually agreed, and that the new organization understands its responsibilities. It is also very helpful for the IANA to receive communications from other parties that may be concerned or affected by the transfer.*"

3.2. GAC Principles 2005

    3.2.1. The GAC Principles 2005 do not deal with the concept of consent by the current operator.

4. Relevant Procedures

4.1. "Understanding the ccTLD Delegation and Redelegation Procedure". The following sections are relevant to the topic of consent:

    4.1.1. "*After IANA receives the request*": "*There are two possible results from the IANA review step. First, IANA may find that they have sufficient documentation to go forward with the request. In this case, IANA staff begins the process of requesting confirmation of the redelegation from existing contacts.*"

    4.1.2. "*Requesting confirmation from contacts*" :

        4.1.2.1. "*Once IANA has completed its verification and analysis of the material supplied in the request it then requests, confirmation of the redelegation from the current administrative and technical contacts (if applicable) as well as the newly proposed administrative and technical contacts.*

        4.1.2.2. *If confirmation is immediate from all parties, IANA proceeds with the next step in the process. In those cases where confirmation is not received from one or more parties, further consultation is necessary.*

IANA's experience has been that a failure to receive confirmation from the existing or proposed contacts can significantly delay and complicate the process.

5. Analysis of IANA Reports on re-delegations

5.1. System for classification of consent - Given the documentation of consent by either the incumbent Manager, AC or TC varies in IANA reports on re-delegations it is necessary to define a system for the classification of consent from these parties to support a meaningful analysis. The classification system developed for this is based on the following definitions:

5.1.1. Documented – The IANA report includes some reference as to how the contact provided consent.

5.1.2. Inferred – Although there is no reporting of consent there is some information in the IANA Report which could imply consent of the contact.

5.1.3. Not Addressed – there is no mention of consent in the IANA Report.

5.1.4. Noted – IANA simply notes or states that the contact has provided consent without any additional documentation from the contact to support the statement.

5.1.5. Refused – The IANA Report documents the contact refusing to consent to the re-delegation.

5.2. Cases of re-delegation - From 2000 to January 2011 there are 50 cases of Re-delegations documented by IANA Reports.

5.3. The full analysis and results are in Annex A.

Consent for request	clear	?	Total	%
Documented	9	2	11	22%
Inferred-questionable	5	0	5	10%
Not Addressed	9	0	9	18%
Noted	21	2	23	46%
Refused	2	0	2	4%

5.4. Analysis of results of consent for request

5.4.1. "Documented and Noted" represent 68% of re-delegation cases where there are few issues with consent for the request as documented in the IANA report.

6. *Issues arising from the analysis of IANA reports on re-delegation.*

6.1. IANA reports on re-delegation variously refer to consent from either the incumbent manager, AC or TC. Should IANA accept consent from either the incumbent manager or both the AC and TC given RFC1591 requires consent from the incumbent manager?

    6.1.1. RFC1591 requires the manager to communicate its consent to IANA for a re-delegation.

    6.1.2. The IANA procedure for re-delegation requires AC and TC consent.

        6.1.2.1. This is not required by RFC1591.

        6.1.2.2. IANA has not reported whether the AC and TC have provided consent for a re-delegation request in 52% of cases.

    6.1.3. Analysis

        6.1.3.1. RFC1591 requires consent from the manager.

        6.1.3.2. IANA reports on re-delegations document managers providing consent for re-delegations in over 62% of cases - this is significantly more than the 48% of cases where the AC and TC have provided consent as per the IANA procedure for re-delegations.

        6.1.3.3. Re-delegations are one of the most critical administrative functions IANA performs for ccTLDs.

        6.1.3.4. Re-delegations are infrequent with an average of 5 requests being completed per year.

        6.1.3.5. There is no documentation as to what should happen if there is a disagreement between the incumbent manager and the AC or TC.

6.2. There is no documentation (procedures or IANA reports on re-delegation) as to what the incumbent and proposed managers are being asked to consent to in a re-delegation.

6.3. There is no clear interpretation of the RFC1591 requirement that the incumbent manager 'communicate its agreement' to IANA. The IANA procedures for re-delegation do not specify how consent should be communicated to IANA and the IANA reports on re-delegation do not document a consistent approach to this.

6.4. IANA has no published criteria for evaluating the consent, as required by RFC1591, of an incumbent or proposed manager for a re-delegation request. The IANA reports on re-delegation do not document a consistent approach to

this as demonstrated by the analysis of IANA reports on re-delegation in the previous section.

6.4.1. Definition of Agreed (Law Definition - http://law.yourdictionary.com/consent)

    6.4.1.1.　Agreed - settled or determined by mutual consent.

    6.4.1.2.　It would then be logical to interpret the current manager having "agreed" as having given consent.

6.4.2. Definition of Consent

    6.4.2.1.　Consent (Law Definition - http://law.yourdictionary.com/consent) - To acquiesce, agree, approve, assent, to voluntarily comply or yield, to give permission to some act or purpose.

6.4.3. Express consent

    6.4.3.1.　Consent that is clear, specific, unambiguous, and communicated by an affirmative act.

    6.4.3.2.　This is a desirable attribute in the context of an incumbent and proposed manager providing consent for a re-delegation. It is also consistent with the requirement in RFC 1591 for a communication from both the old manager and the new manager reflecting mutual agreement.

6.4.4. Implied consent

    6.4.4.1.　Consent that is not affirmatively expressed, but that is inferred from one's conduct, including one's failure to act.

    6.4.4.2.　This would not seem a desirable attribute for Re-delegations and is not consistent with the language in RFC1591.

6.4.5. Informed consent

    6.4.5.1.　Consent given based upon a clear understanding of the facts, implications, and consequences of a course of action.

    6.4.5.2.　This is a desirable attribute in the context of an incumbent and proposed manager providing consent for a re-delegation.

6.4.6. Involuntary (legal definition)

    6.4.6.1.　An act is "involuntary" if it is performed against one's will.

6.4.7. Voluntary (legal definition)

6.4.7.1.   An act is "voluntary" if it is done without compulsion or persuasion.

6.4.7.2.   This is a desirable attribute in the context of an incumbent and proposed manager providing consent for a re-delegation.

6.5. IANA reports on re-delegation are inconsistent in how they document consent from the incumbent and proposed managers.

6.5.1.   There is no policy or procedure requirement that IANA publish IANA reports on delegations and re-delegations.

6.5.2.   IANA has published these reports for all delegations and re-delegations since 2000 when ICANN came into being.

6.5.3.   Publishing these reports is consistent with the ICANN bylaw requirement for accountability and transparency.

6.5.4.   These reports are, in most cases, the only publicly available documentation of delegations and re-delegations beyond the ICANN Board minutes which often contain very limited information.

6.5.5.   There is now an expectation, at least from the ccTLD community, that IANA publish these reports for all delegations and re-delegations.

6.6. Reminder – These issues are only based on the analysis of publicly available information. As noted earlier there are no formal requirements associated with IANA reporting on re-delegations and it would be impractical, inefficient and in breach of confidentiality for IANA to publish all materials associated with a re-delegation.

D. Recommendations

1. IANA undertake the steps necessary to implement the following guidelines:

   1.1. IANA should only seek consent for a re-delegation request from the incumbent manager and the proposed manager. IANA should not seek consent from the Administrative or Technical contacts [From 5.1]

   1.2. The communication from IANA requesting a party's consent should clearly state (a) what the party is being asked to agree to and (b) what steps IANA will or may take in response to the party's (i) affirmative consent, (ii) affirmative refusal to consent, or (iii) failure to respond to the communication requesting consent. It should also advise the Manager to seek legal advice prior to granting consent. The requirement to secure informed consent does not obligate ICANN/IANA to ensure that the party from whom consent is sought is informed about consequences not within ICANN/IANA's control [from 5.2]

      1.2.1. For further clarity of what a party is being asked to agree to in a re-delegation, IANA should clearly indicate that it will undertake all steps necessary to transfer the incumbent manager's role as trustee for the ccTLD (as the term is used in RFC1591) to the proposed manager, including, without limitation, changing the entry in the IANA database.

         1.2.1.1. Note: In RFC1591, the term "trustee" is used to describe the manager's duty to serve the community, and not to describe the specific legal relationship of the manager to the delegated domain.

      1.2.2. For further clarity of what steps IANA will or may take in response to the party's affirmative consent IANA should include the following:

         1.2.2.1. IANA will undertake all necessary verifications to ensure that the requests meets IANA`s requirements (these should be clearly described).

         1.2.2.2. IANA will seek approval for the request from the ICANN Board if it meets its requirements.

         1.2.2.3. IANA will seek approval from the USG-DOC if the request is approved by the ICANN Board.

   1.3. IANA needs to establish and publish a procedure by which it will request a party's consent, the information that will be provided by IANA in connection with such a request, and the manner in which it will receive and document the party's response to such a request. The process used by IANA should create a formal record reflecting who provided the consent or other

response, the status of the person providing the consent or response, and should demonstrate that a party's consent to a re-delegation is clear, informed, unambiguous, affirmatively expressed, and freely given, as each of those terms are defined [from 5.3].

1.4. IANA should adopt the following criteria when evaluating the consent of an incumbent or proposed manager for a re-delegation request or from a proposed manager for a delegation request [from 5.4]:

1.4.1. Consent must be specific, informed, unambiguous, affirmatively communicated, and freely given.

1.4.2. For further clarity consent, by definition, must be voluntary. In practice, however, IANA will rarely be in a position to determine whether or not a party's consent is voluntary. IANA itself must be perfectly neutral and should not attempt to compel, threaten, or persuade the party it is asking to approve a request. Consent may be deemed by IANA in its reasonable discretion to be freely given if it is specific, informed, unambiguous, affirmatively communicated and acquired by IANA without threat or coercion.

1.5. IANA reports on re-delegations should, in order to be effective in communicating relevant information, be consistent and should include the following information [from 5.5]:

1.5.1. Identification of the incumbent manager

1.5.2. Identification of the proposed manager

1.5.3. Clear confirmation that IANA obtained consent (consistent with FOIWG guidelines).

1.5.4. Documentation which supports that the consent that was provided meets the FOIWG guidelines.

2. IANA should report to the GAC and ccNSO at each ICANN meeting on the plan and progress to date in implementing these recommended guidelines.

3. Should ICANN-IANA choose not comply with the FOIWG recommended guidelines for any specific re-delegation, it should provide the rationale for doing so in a public report.

4. Any changes to the FOIWG recommended guidelines should be the subject of a formal public consultation as per ICANN standard procedures.

E. Background and Process

The FOIWG was created by the ccNSO Council following the recommendations of the Delegation and Re-delegation Working Group (DRDWG):

> *Recommendation 2: Delegation and re-delegation of ccTLDs*
> *The DRDWG recommends that, as a first step, the ccNSO Council undertakes the development of a "Framework of Interpretation" for the delegation and re-delegation of ccTLDs. This framework should provide a clear guide to IANA and the ICANN Board on interpretations of the current policies, guidelines and procedures relating to the delegation and re-delegation of ccTLDs.*
>
> *The results of the use of such a Framework of Interpretation should be formally monitored and evaluated by the ccNSO Council after a pre-determined period. If the results of this evaluation indicate that the Framework of Interpretation failed to provide logical and predictable outcomes in ICANN decision making, the ccNSO Council should then launch PDPs on the delegation and re-delegation of ccTLDs.*

The charter of the FOIWG was adopted by the ccNSO Council at its meeting on 16 March 2011 and appointed as its chair Keith Davidson of .NZ (former Chair of the DRDWG). In June 2011 the charter was updated to reflect the participation of the Governmental Advisory Committee (GAC). The charter and the list of participants of the working group can be found at http://ccnso.icann.org/workinggroups/foiwg.htm).

The objective of the FOIWG is to develop and propose a "Framework of Interpretation" for the delegation and re-delegation of ccTLDs. This framework should provide a clear guide to IANA and the ICANN Board on interpretation of the current Policy Statements.

The scope of the FOIWG also clearly specifies that:

- Any proposal to amend, update or change the Policy Statements is outside the scope of the FOIWG.

- The IANA functions contract between the US Government and ICANN, including any contract implementation issues or procedures relating to it, are outside the scope of the FOIWG.

As part of its work plan the FOIWG agreed that the only appropriate documented policies and procedures it would consider for interpretation are RFC1591 and the GAC Principles 2005 [2]. The FOIWG may consider other relevant documentation such

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2   According to DRDWG and charter of the FOIWG the Policy Statements

as IANA Reports on Delegation and Re-delegation or IANA process documentation to assist it in determining if interpretation for a specific topic is required to address the concerns raised by the DRDWG in its final report.

The FOIWG identified the following topics which will be considered individually and in the order presented:

- Obtaining and documenting consent for delegation and re-delegation requests

- Obtaining and documenting support for delegation and re-delegation requests from Significantly Interested Parties (sometimes referred to as Local Internet Community or LIC).

- Developing recommendations for un-consented re-delegations

- Developing a comprehensive glossary of the terms used for the delegation and re-delegation of ccTLDs.

- Developing recommendations for IANA reports on delegation and re-delegation.

The FOIWG produced its initial guidelines on obtaining and documenting consent for delegation and re-delegation requests in September 2011. Per its charter, the guidelines are published as Interim report for Interpretation to seek input and feed-back of the ICANN community regarding the guidelines.

After closure of the public comment period the FOIWG shall review and analyse the

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includes ICP-1 and GAC 2000 Principles as well. As the GAC 2005 Principles replaced the GAC 2000 set, they are not considered by the FOIWG.

With regard to ICP-1 the DRDWG noted that, in 1994, IANA published RFC 1591 as its statement of current practice, in 1997 this was updated with ccTLD News Memo #1 and in 1999, ICP1 was published as its statement of current practice. Contrary to the statements contained in its header, ICP1 does contain significant changes in policies. These changes were never approved by resolution of the ICANN Board. The DRDWG analysis of RFC1591 versus ICP1 concluded that "This policy decision (implementing ICP1) failed to meet all of the requirements for policy development in effect at the time.

Further, in 2001 a majority of ccTLDs active in ccTLD management accepted RFC1591 and the principles it contained as appropriate policies, and these ccTLDs continue their support for these principles today (see www.wwtld.org and www.iatld.org web archives). Neither News Memo #1 nor ICP1 (which integrates News Memo #1) were ever officially endorsed by any significant group of ccTLDs.

As the DRDWG excluded ICP-1, the FOIWG in accordance with its charter excluded ICP-1 as well.

comments received and may, at its reasonable discretion, add appropriate comments in preparation of a Recommendation for Interpretation Report. According to its charter the FOIWG shall not be obligated to include all comments made during the comment period, nor is the FOIWG obligated to include all comments submitted by any one individual or organisation.

Annex A – Classification of "consent" for re-delegation requests

System for classification of consent

    1.1 Given the documentation of consent by either the incumbent Manager, AC or TC varies in IANA reports on re-delegations it is necessary to define a system for the classification of consent from these parties to support a meaningful analysis. The classification system developed for this is based on the following definitions:

        1.1. Documented – The IANA report includes some reference as to how the contact provided consent.

        1.2. Inferred – Although there is no reporting of consent there is some information in the IANA Report which could imply consent of the contact.

        1.3. Not Addressed – there is no mention of consent in the IANA Report.

        1.4. Noted – IANA simply notes or states that the contact has provided consent without any additional documentation from the contact to support the statement.

        1.5. Refused – The IANA Report documents the contact refusing to consent to the re-delegation.

    2.1 Cases of re-delegation

        2.1. From 2000 to January 2011 there are 50 cases of Re-delegations documented by IANA Reports.

    3.1 Classification of consent

        3.1. Classification of consent by contacts

FOIWG - Consent -				

Analysis of consent by Contacts			
	Manager	AC	TC
Documented	22%	12%	4%
Inferred	10%	6%	6%
Not Addressed	24%	38%	42%
Noted	40%	40%	46%
Refused	4%	4%	2%

3.2. Classification of consent for requests

3.2.1. Given the variety of responses documented by IANA in reports on re-delegation it is necessary to develop a classification scheme for requests, vs. contacts.

3.2.2. RFC1591 essentially states that the incumbent manager must communicate its consent for the re-delegation to IANA.

3.2.3. IANA Procedures on re-delegation essentially state that the AC and TC have to communicate their consent for the re-delegation to IANA.

3.2.4. In trying to work with both of these it is necessary to order these. As such it is proposed that RFC1591 be overriding in all cases.

3.2.5. Classification based on consent by the Manager.

3.2.5.1. Manager consent is classified as Documented implies consent for the request should be classified as Documented (regardless of the classification of the AC or TC).

3.2.5.2. Manager consent is classified as Noted implies consent for the request should be classified as Noted (regardless of the classification of the AC or TC).

3.2.5.3. Manager consent is classified as Refused implies consent for the request should be classified as Refused (regardless of the classification of the AC or TC).

3.2.5.4. Manager consent is classified as Inferred-Questionable. The request should be classified as the best of Inferred-Questionable or the result of the classification of consent by the AC and TC as this would be an indication of consent (the FOIWG will have to

decide on the validity of consent in these cases).

3.2.5.5. Manager consent is classified as Not Addressed. The request should be classified as the result of the classification of consent by the AC and TC (as described in the next section).

3.2.6. Classification of consent by the AC and TC

3.2.6.1. Given the IANA procedure requires the consent of both contacts (AC and TC) and that these are not always classified identically it is necessary to develop a scheme to account for this to produce a unique result.

3.2.6.2. Given there are 5 categories and two contacts there are 25 possibilities.

3.2.6.3. Overall it is proposed, given consent is required by both, that the result of the classification of consent of both contacts be the weakest result of either.

3.2.6.4. Classification of the 25 possibilities

AC	TC	Result
D	D	D
D	N	N
D	R	R
D	IQ	IQ
D	NA	NA
N	D	N
N	N	N
N	R	R
N	IQ	IQ
N	NA	NA
R	D	R
R	N	R
R	R	R

R	IQ	R
R	NA	R
IQ	D	IQ
IQ	N	IQ
IQ	R	R
IQ	IQ	IQ
IQ	NA	NA
NA	D	NA
NA	N	NA
NA	R	R
NA	IQ	NA
NA	NA	NA

3.2.7. Results of using this classification scheme

Consent for request	clear	?	Total	%
Documented	9	2	11	22%
Inferred-questionable	5	0	5	10%
Not Addressed	9	0	9	18%
Noted	21	2	23	46%
Refused	2	0	2	4%

The Full results at detailed level are:

FOIWG - Classification of Consent for Requests - sorted by result								
Re-delegation	Date	Manager		AC	TC	AC + TC		Consent for
		Consent		Consent	Consent	Consent		Request
.PN	200002	D		D	R	R		D
.JP	200202	D		D	D	D		D
.MW	200208	D		D	N	N		D
.SD	200211	D		D	D	D		D
.FK	200508	D		N	N	N		D
.FO	200508	D		D	N	N		D
.YU	200709	D		IQ	NA	NA		D
.NG	200904	D		NA	NA	NA		D

.SY	201101	D		NA	NA	NA		D	
.DM	200707	D?		NA	N	NA		D?	
.AE	200801	D?		NA	NA	NA		D?	
.BM	200710	IQ		NA	NA	NA		IQ	
.BB	200711	IQ		NA	NA	NA		IQ	
.BY	200902	IQ		IQ	IQ	IQ		IQ	
.CV	200908	IQ		NA	NA	NA		IQ	
.CA	200012	I-Q		I-Q	I-Q	IQ		I-Q	
.LA	200212	N		N	N	N		N	
.TW	200305	NA		N	N	N		N	
.PW	200306	N		N	N	N		N	
.HT	200401	NA		N	N	N		N	
.NG	200404	N		N	N	N		N	
.TF	200405	NA		N	N	N		N	
.PS	200406	NA		N	N	N		N	
.ES	200409	NA		N	N	N		N	
.KZ	200508	NA		N	N	N		N	
.ZA	200508	NA		N	N?	N		N	
.CX	200601	NA		N	N	N		N	
.TK	200601	NA		N	N	N		N	
.MA	200607	NA		N	N	N		N	
.GW	200704	NA		N	N	N		N	
.KN	200804	N		NA	NA	NA		N	
.MS	200808	N		N	IQ	IQ		N	
.CO	200912	N		NA	NA	NA		N	
.TZ	201004	N		NA	NA	NA		N	
.QA	201010	N		NA	NA	NA		N	
.BF	201101	N		NA	NA	NA		N	
.CD	201101	N		NA	NA	NA		N	
.AF	200301	N?		N?	N	N		N?
.GS	200510	N??		N	N	N		N??
.BI	200111	NA?		D	NA?	NA		NA	
.UZ	200304	NA		NA	NA	NA		NA	
.KY	200306	NA		NA	NA	NA		NA	
.TJ	200306	NA		N	NA	NA		NA	
.MD	200310	NA		NA	NA	NA		NA	
.LY	200409	NA		NA	NA	NA		NA	
.IQ	200507	NA		NA	NA	NA		NA	
.GD	200607	NA		NA	N	NA		NA	
.SO	200902	NA		NA	NA	NA		NA	
.AU	200012	R		R	NA	R		R	
.KE	200212	R		R	NA	R		R	

FOIWG - Classification of Consent for Requests - sorted by ccTLD								
Re-delegation	Date	Manager Consent		AC Consent	TC Consent	AC + TC Consent		Consent for Request
.AE	200801	D?		NA	NA	NA		D?
.AF	200301	N?		N?	N	N		N?
.AU	200012	R		R	NA	R		R
.BB	200711	IQ		NA	NA	NA		IQ
.BF	201101	N		NA	NA	NA		N
.BI	200111	NA?		D	NA?	NA		NA
.BM	200710	IQ		NA	NA	NA		IQ
.BY	200902	IQ		IQ	IQ	IQ		IQ
.CA	200012	I-Q		I-Q	I-Q	IQ		I-Q
.CD	201101	N		NA	NA	NA		N
.CO	200912	N		NA	NA	NA		N
.CV	200908	IQ		NA	NA	NA		IQ
.CX	200601	NA		N	N	N		N
.DM	200707	D?		NA	N	NA		D?
.ES	200409	NA		N	N	N		N
.FK	200508	D		N	N	N		D
.FO	200508	D		D	N	N		D
.GD	200607	NA		NA	N	NA		NA
.GS	200510	N??		N	N	N		N??
.GW	200704	NA		N	N	N		N
.HT	200401	NA		N	N	N		N
.IQ	200507	NA		NA	NA	NA		NA
.JP	200202	D		D	D	D		D
.KE	200212	R		R	NA	R		R
.KN	200804	N		NA	NA	NA		N
.KY	200306	NA		NA	NA	NA		NA
.KZ	200508	NA		N	N	N		N
.LA	200212	N		N	N	N		N
.LY	200409	NA		NA	NA	NA		NA
.MA	200607	NA		N	N	N		N
.MD	200310	NA		NA	NA	NA		NA
.MS	200808	N		N	IQ	IQ		N
.MW	200208	D		D	N	N		D

.NG	200404	N	N	N	N	N
.NG	200904	D	NA	NA	NA	D
.PN	200002	D	D	R	R	D
.PS	200406	NA	N	N	N	N
.PW	200306	N	N	N	N	N
.QA	201010	N	NA	NA	NA	N
.SD	200211	D	D	D	D	D
.SO	200902	NA	NA	NA	NA	NA
.SY	201101	D	NA	NA	NA	D
.TF	200405	NA	N	N	N	N
.TJ	200306	NA	N	NA	NA	NA
.TK	200601	NA	N	N	N	N
.TW	200305	NA	N	N	N	N
.TZ	201004	N	NA	NA	NA	N
.UZ	200304	NA	NA	NA	NA	NA
.YU	200709	D	IQ	NA	NA	D
.ZA	200508	NA	N	N?	N	N

Consent for request	clear	?	Total	%
Documented	9	2	11	22%
Inferred-questionable	5	0	5	10%
Not Addressed	9	0	9	18%
Noted	21	2	23	46%
Refused	2	0	2	4%