

This document contains a summary of the public comments¹ received in response to the draft Work Stream 1 recommendations issued by the Cross Community Working on Enhancing ICANN Accountability (CCWG-Accountability). The comments are summarized in order of submission for each category as applicable. Even though this summary was drawn-up to reflect as accurately and objectively as possible the views expressed by participants, it does not substitute in any way the original contributions which are publicly available for full reference at: <http://forum.icann.org/lists/comments-ccwg-accountability-draft-proposal-04may15/>

Contributions provided by:

[African Regional At-Large Organization \(AFRALO\)](#)
[Association française pour le nommage Internet en coopération \(Afnic\)](#)
[At-Large Advisory Committee \(ALAC\)](#)
[Australia's Domain Name Administrator \(auDA\)](#)
[Business Constituency \(BC\)](#)
[Canadian Internet Registration Authority \(CIRA\)](#)
[Carlos Raúl Gutierrez \(CRG\)](#)
[Center for Democracy & Technology \(CDT\)](#)
[Centre for Communication Governance \(CCG\)](#)
[Council for European National Top Level Domain Registries \(CENTR\)](#)
[CWG to Develop an IANA Stewardship Transition Proposal on Naming Related Functions Stewardship \(CWG-St\)](#)
[Danish Business Authority \(DBA\)](#)
[David Post – Danielle Kehl \(DP-DK\)](#)
[DotConnectAfrica Trust \(DCA-T\)](#)
[eco \(eco\)](#)
[Federal Ministry for Economic Affairs and Energy \(Govt-DE\)](#)
[Google \(GG\)](#)
[Government of Brazil \(Govt-BR\)](#)
[Government of India \(Govt-IN\)](#)
[Government of Italy \(Govt-IT\)](#)
[Government of Spain \(Govt-ES\)](#)
[gTLD Registries Stakeholder Group \(RySG\)](#)
[ICANN Board of Directors \(ICANN\)](#)
[Information Technology Industry Council \(ITI\)](#)
[Intellectual Property Constituency \(IPC\)](#)
[International Trademark Association \(INTA\)](#)
[Internet Architecture Board \(IAB\)](#)
[Internet Association \(IA\)](#)
[Internet Infrastructure Coalition \(I2Coalition\)](#)
[InternetNZ \(.NZ\)](#)
[Internet Services Provider and Connectivity Provider Constituency \(ISPCP\)](#)
[Jan Scholte \(JS\) comment 1](#)
[Jan Scholte \(JS\) comment 2](#)
[Japan Network Information Center \(JPNIC\)](#)
[Jiah He \(JH\)](#)
[Lee Andrew Bygrave \(LAB\)](#)
[London Internet Exchange \(LINX\)](#)
[Milton Mueller \(MM\)](#)
[Ministère des Affaires étrangères \(Govt-FR\)](#)
[Ministry of Foreign Affairs of Argentina \(Govt-AR\)](#)
[Motion Picture Association of America \(MPAA\)](#)
[Namibian Network Information Centre \(.NA\)](#)
[Nigeria Internet Registration Association \(NIRA\)](#)
[Nell Minow \(NM\)](#)
[Nominet \(.UK\)](#)
[Non Commercial Stakeholder Group \(NCSG\)](#)
[Representing the ecosystem of Internet Bahrat-Model \(CCAOI\)](#)
[Richard Hill \(RH\)](#)
[Roberto Bissio \(RB\)](#)
[Root Server System Advisory Committee \(RSSAC\)](#)
[Security and Stability Advisory Committee \(SSAC\)](#)
[Sue Randel \(SR\)](#)
[UNINETT Norid AS \(NORID\)](#)
[US Chamber of Commerce \(USCC\)](#)
[US Council for International Business \(USCIB\)](#)
[US Rep. Mike Kelly HR2251 \(HR2251\)](#)
[William Currie \(WC\) comment 1](#)
[William Currie \(WC\) comment 2](#)

Comments on Specific Recommendations

| Stress Tests | | | |
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| # | Contributor | Comment | CCWG Response/Action |
| 7 8 | RH | Stress test category III, Legal/Legislative Action: as the proposal correctly states the "proposed measures ... might not be adequate to stop interference with ICANN policies". In particular, they cannot stop interference from the country where ICANN is incorporated. Hence, as stated above, ICANN should be incorporated in a neutral country that is unlikely to interfere, for example Switzerland. Or ICANN should negotiate immunity of jurisdiction. | |
| 7 9 | DBA | We would like to underline that stress testing the proposal is of highest importance and we appreciate the work done by the CCWG Accountability in this regard. It is of crucial importance to ensure that the new governance model is truly multistakeholder-based. To this end there must be safe- guards against capture from any specific stakeholder group in any way, including in ICANN's policy development processes and decision making functions. | |
| 8 0 | WC comment 1 | The stress tests are comprehensive and indicate that the proposed changes should be able to withstand pressures from the environment, external and internal, to the ICANN ecosystem. | |
| 8 1 | CRG | Are they any stress test yet about conflicts of interest internal to the corporation (Board- Management, Management-Management)? | |
| 8 2 | Govt-IN | It is noted that the stress test regarding appeals of ccTLD revocations and assignments (ST 21) has not been adequately addressed as the CCWG-Accountability awaits policy development from the ccNSO. Any subsequent | |

¹ The public comment period ran from 4 May 2015 to 3 June 2015. Due to the late availability of the translated versions of the proposal, those who were reliant on these translated versions to provide input will have the ability to submit their comments until 12 June at 23:59 UTC.versions to provide input will have the ability to submit their comments until 12 June at 23:59 UTC.

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| | | accountability architecture should also take into account the results from this stress test. | |
| 8 3 | DP-DK | <p>We also propose adding the following “Stress Tests” to test the adequacy of this formulation (see proposed fundamental Bylaw in Revised Mission, Commitments & Core Values:</p> <p><u>Stress Test 1:</u></p> <p>At urging of the GAC, the Board directs ICANN’s contract compliance department to take the view that, in order to comply with the mandatory PIC requiring a flow down clause in the registry-registrar contract that contemplates the termination of domain names for “abuse,” the registries must provide assurances that registrars with whom they are doing business are actually enforcing that clause by terminating names whenever they receive any complaint of violation of applicable law. The Board insists that this mandatory flow down provision be included in all new contracts for legacy gTLDs upon renewal.</p> <p>Current situation: no real recourse.</p> <p>Proposed situation: Registry could challenge ICANN’s actions as outside its Mission (development of consensus policies on issues uniform global resolution of which is necessary to assure stable operation of the DNS) on the grounds that this was not a consensus policy, nor one that was developed stable and secure operation of the DNS, and for which uniform or coordinated resolution is reasonably necessary to facilitate the openness, interoperability, resilience, and/or stability of the DNS. The IRP would likely find that imposition of this obligation, in the absence of consensus, is not within ICANN’s powers.</p> <p><u>Stress Test 2:</u></p> <p>ICANN terminates registrars on the ground that they do not terminate domain names claimed to have been used to provide access to materials that infringe copyright. ICANN takes the position that, despite the absence of any court orders or due process, and even when the registrar does not host the content in question, it would be “appropriate” to delete the domain name where registrars have received infringement complaints (of a specified kind, in specified numbers) from rightsholders, and that, therefore, the registrar is required by section 3.18 of the Registrar Accreditation Agreement, to delete the accounts or lose its accredited status.</p> <p>Current situation: No real recourse.</p> <p>Proposed situation: An aggrieved party could bring an IRP claim arguing that imposition of this requirement, by mandatory contract, is invalid as a violation of ICANN’s Mission on the grounds that: (1) Neither the contract clause nor the policy of enforcing it in this manner was developed by consensus, but unilaterally by ICANN staff; (2) The policy being implemented is unrelated to “ensur[ing] the stable and secure operation of the DNS” but rather relates to an entirely different set of policy goals; (3) Nor is it a policy “for which uniform or coordinated resolution is reasonably necessary to facilitate the openness, interoperability, resilience, and/or stability of the DNS”; and finally (4) it represents an attempt by ICANN to “use its powers to attempt the regulation of services that use the Internet’s unique identifiers, or the content that they carry or provide.” We believe such an action would be likely to succeed.</p> | |
| 8 4 | IA | IA strongly supports the results of stress test 18 regarding the Board’s response to GAC advice. However, disagrees with paragraph 636, which states that the threat posed by stress test 18 “is not directly related to the transition of IANA stewardship.” We view this issue as directly related to the transition and believe that it is essential that relevant actions be taken to implement this change before the transition is complete | |
| 8 5 | Govt-ES | <ul style="list-style-type: none"> - Test 21: opposed to this stress test. It is based on contentious policy (RFC 1591) and thus, should not be used to test the robustness of new accountability mechanisms. Furthermore, appeal mechanisms to delegation and re-delegation of ccTLDs have been left aside of the accountability enhancements proposed by the CCWG. - Note Singapore GAC Communiqué states the following regarding the Frame of Interpretation WG outcome: “The GAC notes the work of the ccNSO FOIWG, and its efforts to provide interpretive clarity to RFC1591. The GAC welcomes the FOIWG’s recognition that, consistent with the GAC’s 2005 Principles, the ultimate authority on public policy issues relating to ccTLDs is the relevant government. As such, nothing in the FOIWG report should be read to limit or constrain applicable law and governmental decisions, or the IANA operator’s ability to act in line with a request made by the relevant government.” - Test 4: We fail to see how accountability mechanisms can be used to defy a decision not taken by ICANN, but by a third party, i.e., a Government. Thus, we recommend doing without this stress test. - Test 12: It grabs our attention that a stress test named “Capture by one or several groups of stakeholders” is so focused on governments and the GAC. Even in the case of the other SO/ACs, it is stated that they need accountability and transparency rules to prevent capture from outside each community, but little is said about ICANN’s capture by an internal community other than the GAC. - Measures to prevent capture by other groups should be proposed. Otherwise, this stress test overlaps with stress test 18. - Test 18: We cannot agree with this stress test being included in the final report. ICANN Bylaws state that the Board shall duly take into account Governments’ advice “on public policy issues”. - This is the key point: the GAC brings the public policy perspective into ICANN. The GAC advice to the Board is not anything further than an advice that is not binding on ICANN. If the Board doesn’t agree with a particular piece of GAC advice, it has to | |

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| | | <p>enter into a process with the GAC to try and find a "mutually acceptable solution". Again, if this cannot be found, the Board is still free to do what it feels appropriate, including simply not following GAC advice. We fail to see where the contingency or the risk of government capture lays. Advice adopted by a majority of GAC members would still qualify as "public policy advice" which ICANN should afford to ignore. In short, we call on the CCWG to respect GAC's ability to approve its own working methods (Article XI.Section 2.1 c) of the Bylaws) and require the Board to fully consider advice agreed according to GAC internal procedures.</p> <p>- Test 14: We find it is pointless to keep this particular stress test at this moment in time, when the community is actually dealing with the termination of the Ao</p> <p>- Test 15: While the AoC actually states that ICANN should be headquartered in the USA, and the Articles of Incorporation set forth that ICANN is a non-profit public benefit corporation under the California law, we do not believe this should be incorporated into a core or fundamental value of ICANN (page 21), for the reason that the remaining of ICANN subject to Californian Law is not fundamental to the global Internet community.</p> | |
| 8 6 | RySG | <p>- RySG agrees that the so-called "Stress Tests" have been valuable as a tool to weigh the risks and reward of various proposals. As such, we believe the incorporation of the bylaws changes recommended by the CCWG interim proposal would help to enhance ICANN's accountability to the community and NOT doing so would undermine it.</p> <p>We are interested in whether and how the CCWG-Accountability intends to handle Stress Tests where the proposed Accountability Mechanisms are identified as "inadequate" or "partially inadequate".</p> <p>Stress Tests 5, 6, 7, and 8: in the assessment of proposed accountability measures in the case of financial crisis or other loss of revenue: we do not believe that simply leveraging increased fees is a viable solution to this Stress Test and recommend that instead the stress test looked at how ICANN's expenditures could be constrained to reflect the decline in revenue, while minimizing the negative impacts on the key services that it provides.</p> <p>This assessment also raises a more general issue of how the proposed community powers will interact with the contracts between ICANN and its contracted parties. We are concerned about the ability for these agreements to be revised other than through the existing procedures in the Registry Agreement and Registrar Accreditation Agreement. If this is within the intended scope of the community powers, we request that further clarity is provided to permit more substantive comment in the next comment round.</p> <p>Stress Test 16: ICANN engages in programs not necessary to achieve its technical mission, is described as being directly related to the IANA Stewardship Transition. We believe that this is a general issue not directly related to the IANA Stewardship Transition. We request that this statement be revised to reflect this general nature or that greater clarity be provided as to why this Stress Test is directly tied to the IANA Stewardship Transition.</p> <p>Stress Test 20: "Preventive: During policy development, the community would have standing to challenge ICANN Board decisions about policy and implementation." There is a temporal issue in this statement in that the board should not be making policy or implementation decisions before a policy development process was complete, except in limited, emergency circumstances. We suggest that this statement be revised and revised to reflect the processes for Policy Development as defined in the ICANN Bylaws.</p> <p>Stress Test 26: The assessment of proposed accountability mechanism refers to how this would be handled if the action of concern resulted from the board decision. Additional discussion should be included to consider whether these mechanisms would be sufficient if the issue followed from staff decisions and actions that did not directly follow from a board decision, as overturn of the Board decision would not be the appropriate fix.</p> | |
| 8 7 | Govt-BR | <p>With regards to stress tests, Brazil considers that the definition of contingencies is an important tool to test the resilience of the proposed accountability structure.</p> | |
| 8 8 | SR | <p>- para 406 Although it may be out of scope, a 6th stress test category might be capture of root zone by ITU or other body. As there is no legal or technical barrier to such an event - only reputation and political (e.g. arising from para 499). Thus far the US government has provided political cover from this. I see para 596 attempts to address but may be insufficient.</p> <p>- para 452-454 PTI should be forced to publish any audit results in full (e.g.SOC2) and have separate legal advisors from ICANN. e.g., para 549.</p> <p>- para 581, 657 - and reputation loss that could lead to capture.</p> <p>- para 585 YES!</p> <p>- para 613 From past community discussions, if community driven, an "ICANN foundation" may be a desirable outcome.</p> <p>- 663 YES!</p> <p>- 707,708 YES!</p> | |

Bylaws changes suggested by Stress Tests

Question 15: Do you agree that the incorporation into ICANN's Bylaws of the above changes, as suggested by stress tests, would enhance ICANN's accountability? Do you agree with the list of requirements for this recommendation? If not, please detail how you would recommend amending these requirements.

| # | Contribut or | Comment | CCWG Response/Action |
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| 4 | CRG | YES! | |

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| 402 | Afnic | <p>- Afnic strongly supports the implementation of ATRT2 recommendation 9, which modifies the Bylaws in order to mandate Board response to AC formal advice.</p> <p>- As far as stress test 18 is concerned (GAC advice by majority within the GAC and not by consensus), Afnic is of the opinion that every constituency has the right to set its own decision making process, as long as this is done in a transparent manner.</p> | |
| 403 | IA | IA supports the proposed Bylaw change recommendations arising from stress tests. | |
| 404 | Govt-FR | <p>Are we correct in understanding that the "SO/AC Membership Model" would nonetheless give members of other SOs and ACs the opportunity to vote and defeat an empowered GAC, in spite of governments' "rights and responsibilities for international Internet-related public policy issues" (etc.) If so, additional mechanisms specifically designed to mitigate the risk of capture of ICANN by governments, such as the proposed changes to Bylaws art. 1.2 (Core value 11) and XI.2.1.j deriving from stress test #18, are redundant and just cause confusion.</p> <p>Stress test#18 suggests that majority voting in the GAC could lead to a threatening situation where ICANN would have to consider and respond to GAC advice restricting free online expression (Draft prop., section 8.6, §629). This is why it is suggested that Bylaws art. XI.2.j be modified in order to "duly take into account" only GAC advice that is supported by strict consensus (Draft prop., section 8.6, §633). In our opinion, such propositions reflect a tendency among ICANN stakeholders to question the responsibility of governments and public authorities with regard to public policy. What it says: "only when governments reach consensus can we duly take into account GAC advice as public policy advice", actually translates: "governments are not responsible for public policy for so long as they cannot reach strict consensus on GAC advice", which is obviously a false statement. Governments are always responsible for public policy (hence paragraph 35 of the Tunis Agenda, section 2.1.1 of the NETmundial Multi-Stakeholder Statement, or the current Core Value 11 of ICANN). Remote as this possibility may seem, we agree that majority voting in the GAC could lead to a situation where ICANN would have to consider and respond to GAC advice restricting free online expression. With strict consensus within the GAC, however, much less remote seems the possibility that one single government deprives ICANN from GAC advice on privacy protection, for example. We do believe that ICANN would be placed in a far more threatening situation if it could not consider the second type of GAC (would-be) advice, than if it just had to respond to the first type of GAC advice.</p> | |
| 405 | CCG | Stress Test 18 proposes that the ICANN Board reply in a timely manner and find "mutually agreeable solutions" to only that GAC advice where there is consensus involved. How is this different from the existing scenario, and how does this measure enhance the Board's accountability to GAC? | |
| 406 | BC | <p>- BC is pleased that these improvements to the Reviews were embraced by the CCWG and supports the proposal as a way to enhance ICANN accountability. (p.55)</p> <p>- BC supports the proposed Bylaw changes regarding the new gTLD program, specifically that recommendations from the previous review to be implemented before rounds of new gTLDs can be opened.</p> <p>- In prior comments, the BC has supported recommendations from the Affirmation review teams, including ATRT2 recommendation 9.1</p> <p>- 9.1. ICANN Bylaws Article XI should be amended to include the following language to mandate Board Response to Advisory Committee Formal Advice: <i>The ICANN Board will respond in a timely manner to formal advice from all Advisory Committees, explaining what action it took and the rationale for doing so.</i></p> <p>And continues to believe this change should be made to ICANN Bylaws in order to enhance ICANN accountability. Moreover, several stress tests indicate this change would be needed to give the community adequate measures to hold ICANN accountable for its decision not to implement formal advice from an Advisory Committee.</p> <p>- BC supports the proposal for a small change to ICANN's Bylaws, so that ICANN's obligation to "try and find a mutually acceptable solution" only applies where the GAC advice was supported by consensus. (p.64)</p> <p>- On this particular Bylaws provision, the BC suggests that ICANN's obligation to "try and find a mutually acceptable solution" on GAC advice should not result in a decision that conflicts with ICANN Bylaws.</p> <p>- BC notes that important questions with respect to the Root Zone Maintainer still need to be resolved (p.77). Insight into the process of transitioning the Root Zone Maintainer would help ensure there is a well-established structure and process for approval of major architectural and operational changes to the Root Zone environment. The BC calls on the CCWG to clarify which entity will have this role and to establish the process that would be used for consultation with the global multi-stakeholder community.</p> | |
| 407 | USCIB | <p>Overall, we agree with the changes suggested by Stress Tests. Specific comments:</p> <p>- para 377: The consultation notes that where the Board has not taken a formal decision (such as not following AC advice), the community might not have a mechanism to challenge the Boards action (or inaction) to act. USCIB would support a mechanism that allows for a "response" to trigger the review mechanisms.</p> <p>- We note that Stress Test #18 considers a potentially concerning scenario in which Governments in ICANN's Government Advisory Committee amend their operating procedures to change from consensus decisions to majority voting for advice to the Board. para 387: Thus, we strongly support the proposed language in paragraph 387 that limits imposing the obligation on the Board to find a mutually acceptable solution between the GAC and Board to only GAC advice that was developed by consensus.</p> <p>- Moreover, we have seen little discussion about how the proposed accountability measures would address</p> | |

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| | | <p>instances where the Board accepts GAC advice without consideration by or in contradiction to the wishes of the community. We thus recommend creating a separate stress test for the situation where the Board and GAC find a mutually acceptable solution that the community believes is outside the scope of GAC Advice or Board mandate, or otherwise disagreeable to the community and considering a community review mechanism over such Board actions if the stress test indicates that the community cannot sufficiently hold the Board accountable for such action.</p> <p>- para 550: We note that important questions with respect to the Root Zone Maintainer still need to be resolved. Direct insight into the process of transitioning the Root Zone Maintainer would help to ensure that there is a well-established structure and process for approval of major architectural and operational changes to the Root Zone environment. USCIB commends that any future proposal to clarify which entity will have this role, and further, to explicitly establish the process that would be utilized for consultation be a topic of public consultation with the multistakeholder community.</p> <p>- para 636: As mentioned above concerning the proposed response presented in paragraph 387 for Stress Test #18, USCIB supports amending the Bylaws such that only GAC consensus advice would trigger the obligation for the Board to find a mutual acceptable solution. However, we disagree with the paragraph 636, which states that the threat posed by Stress Test #18 "is not directly related to the transition of IANA stewardship. To the contrary, USCIB regards this issue, as captured in Stress Test #18, as directly related to the transition.</p> | |
| 408 | LINX | We support the proposal that special Board procedures for GAC advice should only apply in respect of advice support by a consensus in GAC. We understand this to be the intent of the current provisions and current practice, and so we regard this as simply a useful clarification. | |
| 409 | JPNIC | We would like to defer the comments to those who will be directly affected. i.e., SSAC, ALAC, GAC, RSSAC for "Forcing the Board to respond to Advisory Committee formal advice" and GAC for "Require consultation and mutually acceptable solution for GAC advice that is backed by consensus". | |
| 410 | IPC | <p>-The IPC strongly recommends the inclusion of the ATRT2 recommendation 9.1 <i>The ICANN Board will respond in a timely manner to formal advice from all Advisory Committees, explaining what action it took and the rationale for doing so.</i></p> <p>The IPC believes that the bylaws should be amended to include this language to empower the community to spur the board to action on advice given by ACs.</p> <p>- The phrasing of Stress Test #23 (page 85) seems one-sided. While there may be a danger that "ICANN uses RAA or other measures to impose requirements on third parties outside scope of ICANN Mission," the more plausible danger is that ICANN will fail to enforce contractual obligations and consequently will harm third parties. The stress test exercise is described in paragraph 18 as applying "a set of plausible, but not necessarily probable, hypothetical scenarios" in order to "gauge how certain events will affect a system, product, company or industry." The contractual enforcement failure just described would certainly affect the companies and industries that depend on trademark and copyright protection. The stress test should be adjusted to reflect this, and overall the risk of ICANN's failure to consistently and transparently enforce contracts must be effectively addressed in any accountability framework.</p> | |
| 411 | Govt-BR | Stress Test 18 – "Require consultation and mutually acceptable solution for GAC advice that is backed by consensus" (Chapter 7.2, p.63) – describes a situation which represents a very improbable risk of capture. That being said, Brazil considers that any decisions that should result from the assessment of ST18 be considered as a Work Stream 2 item. | |
| 412 | USCC | - Support the results of Stress Test 18 and agree with the proposed bylaw amendment. ICANN bylaws should stipulate that GAC advices must be issued by consensus in order to compel the ICANN Board to find a mutually acceptable solution when it does not follow GAC advice. | |
| 413 | INTA | <p>- agrees that the incorporation of changes as suggested by stress tests should help to enhance ICANN's accountability. The twenty-six separate stress tests outlined in the Proposal appear broad enough to cover all major contingencies.</p> <p>- agrees that a mechanism should be established by which the Community can compel the Board to make a decision in response to advisory committee ("AC") advice, but it must be carefully crafted to facilitate the focused goal of triggering the ability for the Community to challenge the decision via Reconsideration or IRP processes. Advisory committees give advice, not direction, and this mechanism must recognize that the Board should respond to but is not obligated to accept AC advice.</p> <p>- In regard to the Governmental Advisory Committee ("GAC") advice, we generally support amendment of the Bylaws to require the Board to try to find a mutually agreeable solution only where GAC advice was supported by GAC consensus.</p> | |
| 414 | .NZ | - supports these changes – in particular the one relating to ICANN's response to GAC advice. It is important that unilateral action by an SO or AC not lead to a change in the balance of influence in the ICANN system. The proposed change as set out in para 387 achieves this in a way that does not constrain GAC's ability to organise itself. | |
| 415 | HR2251 | - The board of directors of ICANN is prohibited from voting on advice or a policy proposal offered by the Governmental Advisory Committee unless such Committee reaches consensus regarding such advice or proposal. For purposes of the preceding sentence, the term "consensus" means general agreement in the absence of any formal objection. | |
| 41 | CENTR | We recommend that the proposed change to ICANN Bylaws regarding the Board response to Governmental | |

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| 6 | | Advisory Committee Formal Advice be made more stringent as “will respond in a timely manner” is too vague and does not commit the Board to respond within any specific timeframe. | |
| 4 1 7 | I2Coalition | We support the proposed Bylaw change recommendations arising from stress tests. In particular, we strongly support the results of stress test 18 regarding the Board’s response to GAC advice. ICANN Bylaws should stipulate that GAC advice must be issued by consensus in order to compel the ICANN Board to find a mutually acceptable solution when it does not follow GAC advice | |
| 4 1 8 | NIRA | NIRA agrees. | |