

Commenter	Regarding which Recommendation	Comment	Response	Change	Where
ALAC	Overall	<p>The At-large Advisory Committee (ALAC) of ICANN takes this opportunity to thank ICANN for putting forward the Cross Community Working Group on Enhancing ICANN Accountability Work Stream 2(CCWG-Accountability WS2) final report for public comments.</p> <p>The ALAC finds that the final report is in general consistent and addresses the requirements of section 27.1 of the ICANN Bylaws on WS2. However, we would like to note that the assurance of full consistency between all of the recommendations - which are noted in the report to be more than 100 - would depend primarily on the interpretation of the recommendations and the implementation plan. Therefore, we recommend paying close attention to the matter when developing the implementation plan and dedicating enough time to ensure that inconsistencies do not result due to misinterpretation of the recommendations.</p> <p>The recommendations formulated in the various sections of this report all have merit in advancing ICANN's transparency and accountability. However, taken together, they may amount to a daunting burden on ICANN Org and its volunteer community. For this reason ALAC recommends that as the recommendations are implemented, ICANN takes an approach to minimize the impact and work associated with following these recommendations. Finally, we would like to allude that ALAC is ready to support an implementation team composed of the co-chairs and rapporteurs of the CCWG accountability.</p>	No inconsistencies identified. The comments relative to implementation will be considered by the WS2 implementation team.	N/A	N/A
Gnso-NCSG	Diversity	The NCSG supports the eight recommendations on diversity	No inconsistencies identified	N/A	N/A
Gnso-NCSG	Guidelines for Good Faith	The NCSG supports the proposed guidelines and recommendations	No inconsistencies identified	N/A	N/A
Gnso-NCSG	HR-FOI	The NCSG supports the framework of interpretation for the ICANN Bylaw on Human Rights, and we also endorse the considerations and conclusions listed in the annex.	No inconsistencies identified	N/A	N/A
Gnso-NCSG	Jurisdiction	The NCSG supports these recommendations, and we call for their full and timely implementation.	No inconsistencies identified	N/A	N/A
Gnso-NCSG	Ombuds	The NCSG has strong concerns in relation to the the proposed Ombuds office recommendations. While we support some of the recommendations, we believe that the concerns outlined in the NCSG comment to the subgroup reports on the independence of the Ombuds office were not adequately addressed ¹ . The NCSG therefore objects to this part of the Workstream 2 report for falling short of addressing this important aspect of the future work of the Ombuds office.	No inconsistencies identified	N/A	N/A
Gnso-NCSG	SO/AC Acct.	The NCSG supports the recommendations and conclusions that the group reached in its entirety in relation to SO/AC accountability	No inconsistencies identified	N/A	N/A
Gnso-NCSG	Staff Acct.	The NCSG supports these recommendations	No inconsistencies identified	N/A	N/A

Gnso-NCSG	Transparency	The NCSG supports the transparency subgroup recommendations in general. However, we would like to express again our support for the dissenting opinion which was jointly submitted by the NCSG and CSG. As the dissenting opinion stated: "We submit this minority statement not to disagree with the final recommendations, but to express dismay that the Working Group was not able to achieve consensus support for any clear principles to guide ICANN's decisions as to when to waive attorney-client privilege, and better align them with the overarching Bylaws obligation to "operate to the maximum extent feasible in an open and transparent manner.	No inconsistencies identified	N/A	N/A
Gnso-NCSG	Implementation	While the report itself states that most of the "modifications, and many of these are either suggestions of good practices or simply optional while many others offer flexibility in how they can be implemented", it suggests that this will be a multi-year project. Some of the recommendations might take longer and some might not. The start of implementation of each project should not depend on how long it will take. Considering this, the NCSG supports the implementation approach.	No inconsistencies identified. The comments relative to implementation will be considered by the WS2 implementation team.	N/A	N/A
Govt France	Jurisdiction	ROUGH MACHINE TRANSLATION ONLY - NOT AN OFFICIAL TRANSLATION -The Government France thanks the Jurisdiction Sub-Group for the many efforts made to advance this Issue which is crucial to strengthen the accountability of ICANN to the whole of the Stakeholder Community. Since its launch in June 2016 the Jurisdiction sub-group has had deep disagreement among its members which demonstrate the important divergence of views on the mandate of the sub-group, its objective and the scope of possible solutions. Although the recommendations in the report are in the right direction, the French Government considers that these do not go far enough to truly bring a solution to the problems raised relative to the unilateral jurisdiction of an organization which has the mandate to manage the Internet naming system for the world. Currently ICANN is an entity that is only subject to American law which has many impacts as to the accountability of ICANN with respect to the equality between the different stakeholders. In order to improve the accountability of ICANN to all its stakeholders should require that no individual stakeholder should have a direct or indirect advantage in ICANN undertaking its global responsibilities. Taking into account the strong disagreements within the sub-group the French Government encourages the sub-group's members to explore new possibilities for recommendations by looking into the possibility of partial immunities for ICANN vs US law in order to ensure its independence and its accountability to all of the international Internet community. Comments Related To the report of Recommendations Of the CCWG on Jurisdiction	No inconsistencies identified. The Jurisdiction recommendations include the following recommendation which could address the concerns raised - "	N/A	N/A
i2Coalition	Overall	Again, we appreciate the efforts of the CCWG Accountability working groups to improve accountability and transparency within ICANN. We are looking forward to working towards stronger conclusions on jurisdiction and working with the ICANN community as it prepares for the implementation of these recommendations.	No inconsistencies identified	N/A	N/A

Gnso-RYSG	Overall	<p>The Registries Stakeholder Group (RySG) welcomes the opportunity to comment on the Final Report of the CCWG-Accountability WS2.</p> <p>The RySG has no comment to make regarding inconsistencies.</p> <p>We do express our sincere gratitude to the leaders, participants, and staff involved in the CCWGAccountability WS2 for their thoughtful and significant efforts in shaping the future accountability framework for ICANN and the community.</p>	No inconsistencies identified	N/A	N/A
S. Bachollet	Diversity	<p>Why ICANN need an independent diversity “officer”?</p> <p>Each structured group within ICANN can take for themselves responsibility to enhance their internal diversity.</p> <p>But how can we handle the diversity in the working groups (cross-community, review teams...)? (Not included in the diversity report).</p> <p>And how can we have an overall/systemic view of the diversity in ICANN and proposal to enhance it?</p> <p>We suggest adding in the IOO responsibilities the role of independent diversity “officer” (IDO).</p> <p>As suggested in the Diversity Sub-group WS2 ICANN Accountability:</p> <ul style="list-style-type: none"> · Each ICANN SO/AC/group, will undertake an initial assessment, define and publish their objectives and strategies with regular updates. · ICANN staff will provide help, support, assistance and tools, in regard with diversity related activities and strategies to each SO/AC/group. <p>The IOO will be receiving (in addition of all the publication ways proposed in the diversity subgroup report each assessment, documents, publications... finalized by SO/AC/group. As IDO it will act as the external expertise body for both ICANN staff and SO/AC/group (as per recommendation 1.8 of the diversity report).</p>	No inconsistencies identified	N/A	N/A
GNSO-BC	Overall	<p>The ICANN Business Constituency (BC) has not identified any material inconsistencies between recommendations in the CCWG-Accountability Work Stream 2 (WS2) Final Report.</p> <p>Moreover, we believe that CCWG-Accountability has met the requirements of section 27.1 of the ICANN Bylaws regarding WS2, and should deliver its recommendations to the ICANN Board and Chartering Organizations.</p>	No inconsistencies identified	N/A	N/A