ISPCP Comments on Deferral of ccNSO Review - 19 May 2017

The Internet Services Provider and Connectivity Provider Constituency (ISPCP) respectfully submits the following comments.

We understand this request for deferral being the second after the previous ccNSO review. As a consequence it adds up to two years of delay compared with the usual five-year cycle.

Without trying to assess the reasons why any SO/AC may ask for a deferral we observe some facts in general:
- Those who have to carry out a review never like it
- Due to other workload there's (almost) no time left for this exercise

According to the bylaws (4.4) the board can determine whether a review at the time prescribed by these bylaws is feasible or not. But determination through offering the concerned community the option of deferral – as done by the board letter from 14 March 2017 to the ccNSO and other SO/ACs – seems like an anticipation of the result.

To our understanding this can't be the meaning of this article.

Consequences could be that
- other SO/ACs are being not encouraged to continue their own efforts to cope with the planning requirements
- the entire structure of review planning on ICANN level gets out of control

In this context we repeat our suggestion provided at the Copenhagen meeting that within a reasonable short timeframe a review similar to those under section 4.4 of the bylaws should be conducted looking to more than just SO/AC chunks, maybe looking to the entire picture.

With that proposal, the ISPCP would add that in recognition of a number of the points made above, the ISPCP would not oppose the proposal to defer this ccNSO review, particularly when taking account of the workload facing ICANN at this particular time.

It is also the view of the ISPCP that the need to take a holistic review of the organisation overall is long overdue. Conducting repeated reviews of specific parts of the ICANN structure will only continue to mask many of the issues that urgently need to be addressed, so that ICANN can face future challenges in the best manner, rather than with an overall structure that is rooted in the past.

Thank you for your kind consideration.