ccNSO SOPC comments - DRAFT 05

19 July 2019

Draft Operating Initiatives for the development of the 2021-2025 Operating and Financial Plan

- From a purely communication perspective, we noticed that the public comment on two documents that are defined as 'key documents' by ICANN staff was initially announced via a blog entry, rather than within the News section of the ICANN website. We warmly recommend that their publication is always announced on the News section and additionally, via blog entry and/or other more informal communication channels.
- Additionally, and also from a communication perspective, we recommend an initial infographic displaying the distinctions between Strategic Objectives and Strategic Goals, Operating Initiatives (partially detailed in the Draft Plan) and Operating Activities (that will be disclosed only in December 2019), in order to make the document more accessible to the community.

Comments on the 16 Operating Initiatives that will help ICANN to achieve the Strategic Plan Objectives 2021-2025:

First of all, it is quite difficult to submit comments on Initiatives that are presented with a limited set of information and do not describe their milestones and, above all, the resources that are needed to develop them (recurring comment of the SOPC).

Prioritisation of the Initiatives is missing, and the overall narrative should be improved to be more accessible and to allow more stakeholders to understand the Plan and (subsequently and eventually) to submit comments. It would be recommendable to share the rationale that led to those 16 Initiatives being presented and the others discarded (recurring comment of the SOPC).

Specific comments on some of the Initiatives:

- *Strategic Objective: Strengthen the security of the Domain Name System and the DNS Root Server System.*
    - → Operating Initiative: Promote Domain Name System Security Extensions and increase its deployment.
        - *The rationale behind the decision to focus on DNSSEC to achieve the Strategic Objective is unclear. There may be other initiatives and protocols that might contribute to the same Objective. At a practical level, we recommend that ICANN surveys the registry, registrar and registrant community to gain a better understanding of the end-user demands of DNSSEC, of the challenges in educating end-users, and of the financial efforts that registries and registrars who are supporting and promoting DNSSEC are facing. Indeed, over the past years the ccTLD registry community has made significant efforts to support and promote DNSSEC – yet the DNSSEC has failed to take off at the end-user level.*

- → Operating Initiative: Coordinate security in the DNS ecosystem.
  - *'Coordinate security' is quite a broad area that requires both sound expertise and a long-term vision of what the community wishes to achieve. We believe that content regulation should be avoided at all costs and is an area in which ICANN should not be involved. The description of the Initiative contains the following: 'Subtopics may include the processes for integrating ICANN org's Crisis Management Team into DNS-related security events and exploring mechanisms for secure communications with or between external parties to enable trusted environments for communications during events.' We would like to commend ICANN for this Initiative, but remain vigilant on its concrete implementation.*

- *Strategic Objective: Improve the effectiveness of ICANN's multistakeholder model of governance.*
  - → Operating Initiative: Evolve and strengthen the multistakeholder model to facilitate diverse and inclusive participation in policy-making.
    - *The Initiative is again described at such a high level that it is difficult to produce specific comments. It would have been desirable for ICANN org to have shared some details on their plans to address the current 'fatigue' of a multistakeholder model that is showing major weaknesses at the inclusivity and diversity levels. ICANN should address this complex matter, not in a five-year timeframe, but for a much longer term. A vision for the next-Internet-generation multistakeholder model is a topic this Committee has urged ICANN to investigate, especially considering the fast development of Internet platforms that fall outside ICANN's ability and mandate.*

  - → Operating Initiative: Evolve and strengthen the ICANN community's decision-making processes to ensure efficient and effective policy making.
    - *Within the description of this Initiative there is a paragraph that deserves full attention. It reads, 'The current levels of community policy and advisory work require a substantial amount of staff and community resources. Concurrently, there is an increasing number of requests for professional assistance with specific subject-matter expertise (e.g. legal advice), surveys and other data collection efforts, and policy impact assessments. These community needs will continue to put pressure on resources during FY21–25. ICANN org will continue to provide the necessary support for policy development and advisory activities undertaken by the SOs and ACs.' We are happy to reiterate a comment that we have made on numerous occasions. The implicit logic of the above paragraph is as follows: 'The community asks – ICANN provides support'. This is not the way it should be. ICANN's mandate is to coordinate some of the technical aspects of the Internet. As such, protocol should be as follows: 'The Community asks, ICANN org evaluates, prioritises (if not done by the Community) and eventually, provides support'.*

- • → Operating Initiative: Develop internal and external ethics policies.
  - o *We fail to understand – and the texts fail to explain – why this is important in order to achieve the Strategic Objective. At the same time, we believe that this should fall under the 'Operating Activities'.*
- • → Operating Initiative: Review and evaluate current meeting strategy.
  - o *We believe this should also be classified as an Operating Activity as it refers to what should be a regular ICANN exercise (recurring SOPC comment).*

- ▪ *Strategic Objective: Evolve the unique identifier systems in coordination and collaboration with relevant parties to continue to serve the needs of the global Internet user base.*
  - • → Operating Initiative: Formalize a framework for further cooperation and coordination among the domain name, Internet numbers, and protocol parameter communities on risks associated with the evolution of the Internet's system of unique identifiers.
    - o *'This Operating Initiative is intended to establish a framework with the various identifier communities, work jointly and collaboratively with those communities on matters that impact the overall security, stability, and resilience of the identifier system as a whole and the DNS in particular.' We believe this should be classified as Operating Activity. At the same time, ICANN could better explain both what they mean when they refer to 'framework' and why exactly they want to act as a coordinator among the various players of the DNS community.*

  - • → Operating Initiative: Promote and sustain a competitive environment in the Domain Name System.
    - o *Aside from historical and technical inaccuracies in the text, ICANN should explain how they believe that the only way to 'promote and sustain a competitive environment' is to have a new gTLD round. We believe there are many other ways to promote and sustain a competitive DNS environment, starting with an assessment of the added-values brought by the new gTLDs as well as of the challenges that many operators are facing in developed and developing countries. We recommend detailed Initiatives concerning the possible technical/administrative/logistical support that ICANN could provide to expand domain name literacy at a worldwide level.*

Strategic Objective: Address geopolitical issues impacting ICANN's mission to ensure a single, globally interoperable Internet.

All the Initiatives described to achieve this Strategic Objective are quite disappointing. They are (re)proposing the same formula over and over. We see neither any focus on the long-term, nor any prioritisation of the work to be done at a governmental level in the next decade. The Initiatives are formulated far too generically and superficially.

- → Operating Initiative: Evaluate, align and facilitate improved engagement in the Internet ecosystem.
    - *We believe that the 'alignment' is a crucial element, especially within ICANN rather than outside of ICANN.*
- → Operating Initiative: Improve engagement and participation with Government, Intergovernmental Organizations.
    - *As one of the 'plans' of the previous initiative is to align engagement, we recommend that this Initiative be merged with the earlier one (recurring SOPC comment). The text reads that, 'During FY21–25, ICANN org will assess the expectations of participants in the GAC, and create targeted material, capacity-building resources and online training courses to better equip government stakeholders around the world to become active participants in the GAC's advisory role to the ICANN Board on public policy issues.' We recommend that ICANN rephrases the title of the Initiative to make it clearer and more precise. At the same time, we believe that the creation of 'targeted material' and the organisation of 'training courses' should be daily operations rather than Initiatives. As highlighted in comments to previous Strategic and Operating Plans, the overall international engagement of ICANN would benefit from having clearer priorities, optimising resources and, above all, avoiding the duplication of efforts.*
- → Operating Initiative: Monitor legislation, regulation, norms, principles and initiatives in collaboration with others that may impact the ICANN mission. *Considering what happened with GDPR, we recommend this to be a true top-priority for ICANN.*

- *Strategic Objective: Ensure ICANN's long-term financial sustainability.*
    - → Operating Initiative: Formalize the ICANN org funding model and improve understanding of the long-term drivers of the domain name marketplace.
        - *We welcome this Initiative where we read 'As ICANN org formalizes its funding model, the org plans to evaluate the migration of the forecast model to a platform that will offer robust performance'. We look forward to seeing a timeframe for these plans and its distribution within the community. We reiterate our opinion that ICANN should have a prudent approach to its funding model, giving priority to the replenishment of its reserves.*

    - → Operating Initiative: Planning at ICANN.
        - *We also welcome this Initiative, but we suggest it is moved to the level of Activity. The following actions, 'evaluate and aim to improve the quantification of resources, evaluation of needs, prioritization, flexibility, transparency related to the planning process' should be day-to-day activities that are embedded in the heart of any international and multistakeholder organisation (recurring SOPC comment).*

- → Operating Initiative: ICANN reserves.
  - o *As already stated by the SOPC, we believe that ICANN should have the 12 months operating reserve set as soon as possible.*

Other initiatives that should be included

We strongly recommend initiatives concerning 'Universal acceptance' and support 'IDN implementation and use' for inclusion in the Plan. These aspects would be consistent with recent presentations given by ICANN in which both Universal Acceptance and support to IDNs are shown as key areas for future action.