



GNSO Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Policy Recommendations for ICANN Board Consideration Comments from the Internet Infrastructure Coalition (i2Coalition)

The Internet Infrastructure Coalition (i2Coalition) greatly appreciates the opportunity to provide this public comment to the ICANN Board of Directors as it considers the Final Report of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process.

The Final Report is the result of six months and countless hours of work by volunteers from all corners of the ICANN community (as well as ICANN staff), and we commend the EPDP working group for its significant work and ability to reach the consensus where it did. i2C generally supports the policy recommendations contained in the Final Report.

The EPDP had to balance not only establishing policy recommendations based to the greatest extent possible on consensus, but also balancing it against the requirements of the General Data Protection Regulation (GDPR), which often requires legal advice to understand. It is i2C's position that the EPDP has done this effectively.

As the Board is well aware, the multi-stakeholder, bottom-up, consensus model is key to ICANN gTLD policy development. By definition, consensus is striving toward general agreement. It requires compromise. There are statements within the Final Report that indicate certain community members will not agree to consensus unless a policy recommendation satisfies all of its wants. This seems contrary to the spirit of the policy development model.

The multi-stakeholder, bottom-up, consensus model cannot be effective if policy outcomes must ensure each community member gets all of what it wants. We encourage the Board to adopt the Final Report to affirm the policy development model and the ideals it includes of fair representation, consensus, and consistency.

For the reasons stated above, we encourage the ICANN Board to adopt the policy recommendations outlined in the Final Report.

Sincerely,

The Internet Infrastructure Coalition (i2Coalition)

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