ICANN's Strategic Plan 2021-2025
ccNSO SOPC feedback
5 February 2019

Introduction

The ccNSO Strategic and Operational Planning Committee (SOPC) welcomes the opportunity to comment on ICANN's Strategic Plan 2021-2025.

The Strategic and Operational Planning group was created at the Cairo ICANN meeting in November 2008. The working group became a Committee in November 2017. The goal of the Committee remains the same in 2018: to coordinate, facilitate, and increase the participation of ccTLD managers in ICANN's strategic, operational, planning and budgetary processes.

According to the revised Charter published on 1 November 2017, the Committee may, as part of its activities, hold a position and/or provide input on the public comments forum. It may then relate to ICANN (or other supporting organizations and advisory WGs) on its behalf. The views expressed, therefore, are not necessarily those of the ccNSO (Council and its membership body) or the ccTLD community at large. Membership of the Committee is open to all ccTLD managers (members and non-members of the ccNSO).

SOP Committee members

- Giovanni Seppia, .eu (Chair)
- Wafa Dahmani, .tn
- Irina Danelia, .ru
- Stephen Deerhake, .as
- Philip Du Bois, .be
- Russell Haworth, .uk
- Roelof Meijer, .nl
- Andreas Musielak, .de
- Abdalla Omari, .ke
- Barrack Otieno, AfTLD
- Barbara Povše, .si
- Pablo Rodriguez, .pr
- Leonid Todorov, APTLD
- Mary Uduma, .ng
- Michael Vassilakis, .gr
- Jordan Carter, .nz
- Sean Copeland, .vt

Vision
ICANN should be commended for acknowledging a drastically evolved external environment, which necessitates a revision of its strategic priorities. Equally commendable is ICANN's readiness to listen to the community and incorporate its input as major components in the strategic document. What seems to be missing is a reference to the notion of stewardship. Furthermore, in the absence of a specific interpretation of the concept of 'global public interest', it would be wise to refrain from its usage or have it be accompanied by strictly-defined qualifications.

Mission
We have no comments regarding ICANN's mission and find it comprehensive and exhaustive. We also particularly welcome paragraph 1.1.(b) holding that 'ICANN shall not act outside its Mission', which this group has advocated at length.

Generic
We would like to compliment ICANN for making available clear explanations about the relevance of each of its five strategic objectives. However, it is less clear how ICANN tested the appropriateness of the proposed Strategic Goals with regards to the Strategic Objective: there is no indication of other goals that may have been considered, or what criteria determined the goals that have been approved.

A strong logical chain from the Targeted Outcomes to the Strategic Goal is not always apparent. Targeted Outcomes are the 'strategy' of the plan, articulating *how* specific goals will be achieved. However, because they described only in single sentences, it is difficult to ascertain ICANN's reasoning for *why* those outcomes are the best for the established goal(s).

Strategic Objective 1

- We would appreciate a definition of 'DNS stakeholders';
- Targeted Outcomes under 1.1. reads, 'ICANN, in partnership with DNS stakeholders, establishes a coordinated approach to effectively identify and mitigate DNS security threats and combat DNS abuse'. Perhaps it would be more appropriate to replace the verb 'establishes' with 'promotes'**;**
- The Strategic Risks item, 'The single, interoperable Internet is threatened if the entrenched DNS fails to evolve' should top the list, as it is the greatest and most universal risk of all.
- As for Strategic Goal 1.2., in the box Strategic Risks, the item 'Governmental interest in stronger control over the Internet and cybersecurity could influence DNS root server governance structures' should top the list, while the item 'The lack of an accountable governance structure could lead to insufficiency in DNS root service, potentially encouraging the development of alternative DNS root services' should be updated to read 'The lack of an accountable **collaborative private-sector-led** governance structure could lead to insufficiency in DNS root service, **potentially encouraging certain actors to attempt to develop** alternative DNS root services';
- For Strategic Goal 1.3., we recommend avoiding phrases such as 'like DNSSEC within the DNS' in the Targeted Outcome, as they are excessively particular;

- For Strategic Goal 1.4., we suggest merging the two foremost Targeted Outcomes to read, 'The reliable, resilient, and interoperable DNS remains the leading trusted platform for the Internet's addressing system.'

Strategic Objective 2

- The success of the model (real participation of all stakeholders) can also cause its downfall by triggering possible delays in decision-making and having a high threshold for decisions on controversial issues (i.e. it is impossible to align the stakes of all stakeholders);
- The all Objective states what needs to be improved, addressed, strengthened, enhanced and sustained, but gives no clue whatsoever to how this will be achieved.
- It is hard to distinguish the difference between Strategic Goals 2.1., 2.2., and 2.3. Strategic Goal 2.2. states clearly that it is about processes. Strategic Goal 2.3. is about representation, participation and engagement. However, Strategic Goal 2.1. (looking closely at the Targeted Outcomes) includes prioritization as well as processes and representation. Either there is no need for three Objectives (two would suffice), or the wording should be improved to reflect their intended meaning.

Strategic Objective 3

- In the introduction, please correct the typo by inserting a space to read 'interoperable infrastructure'.
- Regarding Strategic Goal 3.2., three out of the four Strategic Risks effectively involve Governments defying the concept of single, interoperable Internet by developing alternative root-server arrangements. This does not seem entirely consistent with the wording of the Goal *per se*. As such, we recommend that the wording be checked and amended to identify more relevant risks;
- The Targeted Outcome of Strategic Goal 3.3. reads, 'ICANN promotes and supports awareness of the IANA functions to successfully maintain the broad array of Internet unique identifiers and deliver effective DNS root zone operations'. This is too general. For greater clarity and specificity, it should include the words 'among stakeholders'; that is, 'ICANN promotes and supports awareness of the IANA functions **among stakeholders** to successfully maintain the broad array of Internet unique identifiers and deliver effective DNS root zone operations.'
- Regarding Strategic Goal 3.4., in the Targeted Outcome box, the second item could be updated to read as follows: 'New gTLDs continue to serve the evolving domain name marketplace and diversity **of opportunities** for Internet users'. Furthermore, it would be logical to complement the list of Outcomes with the statement, 'The new round of gTLD is a success, with their maxim possible proportion delegated to the root and sustain operation and consistent expansion thereafter.'

Strategic Objective 4

- We support the assessment and inclusion of possible geopolitical issues (and differences), as they do indeed constitute a threat to the stability and success of our industry.
- Few things begin at the global level; most concerns are national or regional. The document mentions relationships with regional organizations. As such, we believe that ICANN could (and should) collaborate more with country code registries to gain information and approaches on issues that begin nationally but have the potential to grow wider.
- In Strategic Goal 4.1., the word 'threats' could reasonably be replaced by 'changes'. ICANN should indeed identify changes that require reaction – but not all of these are threats. A good example is GDPR: it cannot be considered a threat, but ICANN failed nevertheless to react in timely manner.
- In Strategic Goal 4.2., the goal itself aims to raise awareness about single, global, interoperable Internet, while the Targeted Outcomes for this goal are focused on ICANN itself (knowledge about ICANN and its mission; ICANN as engaged; education about ICANN's role and mission, etc.). We believe that Targeted Outcomes should be aligned with the goal – i.e. focused on raising awareness about the Internet, not only ICANN itself.

Strategic Objective 5

- The three strategic goals,
  - Enhance ICANN's understanding of the domain name marketplace;
  - Strengthen cost management and financial accountability mechanisms;
  - Enhance ICANN's financial planning model,

  are logical derivates of the Strategic Objective. However, considering ICANN's age, they are slightly alarming. One would expect such goals in a start-up/scale-up phase, but not in a mature, multimillion organization.
- We appreciate reading good planning in phrases such as 'prioritize it work' and 'balance investments'.
- The text provides arguments for its strategic goals, among which the need to replenish the Reserve Fund, and investments in essential technology and security requirements, are valid reasons. 'The growing needs and demands of the global community' are presented as an additional motive. ICANN has a tendency to broaden its fields of involvement and engagement, occasionally without basis in demand. When it does consider both demand and the financial resources available, demand is created. Thus, ICANN should not only consider its income and expenses, but should also be very restrictive with regard to new engagements that involve financial support.