ALAC Comments on Operational Design Phase Concept Paper v2.0

The ALAC appreciates the opportunity to comment on the ODP Concept Paper v2.0.

The ALAC supports the idea of an Operational Design Phase (ODP) to provide sufficient information to the Board in their decision process on addressing complex PDP recommendations such as those coming from EPDP Phase 2.

The ALAC agrees that the Community Design Feedback Group (DFG) as described in the original concept paper was overkill and would add unneeded complexity and time to an already long process.

However, the concepts that it embodied were extremely important. Specifically:

- Those providing feedback would have specific qualifications related to the subject of the design phase; and
- The group would be charged with proactively seeking and coordinating feedback from their respective groups.

The replacement proposed on the v2.0 paper sadly loses all of this. By replacing the DFG with a (or perhaps multiple as discussed during the webinar) GNSO Council liaison(s):

- we no longer have subject-matter experts involved;
- We no longer may have direct paths to the communities who will be involved in the final product, noting that some of these communities may not be presented on the GNSO.

Looking at the SSAD as an example, the GNSO may be able to represent contracted parties and even some of the potential SSAD users, but there would be a complete lack of representation of communities such as law enforcement and cyber-security experts who will certainly be among the most critical SSAD users.

Without this groups having a clear path to commenting on and influencing the operational design (we are not talking about altering the policy), the chances that the Board will consider and approve a design which will meet all of the multiple communities needs will decrease significantly. And that negates the very purpose for which the ODP was created.