

## IRP Draft Supplemental Procedures Public Comment Analysis

Support for 45 day deadline	
Nobody? Support “for balancing celerity and due process” - 1 respondent	ALAC
Support in principle for a fixed time bar of (e.g.) 12 months	
1 respondent	Hill
45 days is too short	
8 respondents	AFNIC (180 days); Auerbach (180 days); NCSG (180 days); INTA (90 days); Hill (90 days) RySG (eliminate); ISPCP; DotMusic; LINX
Additional reasoning: 45 days constitutes bias – 3 respondents	Auerbach; LINX; NCSG
The “fixed limit” (12 months) is wrong in principle	
7 respondents	Sullivan, Rosezweig, CCG Delhi, NCSG, DotMusic, BC, LINX
Additional reasoning: Ensure mission limits 3 respondents	Rosenzweig, NCSG, LINX (extended example)
No deadline if ICANN violates core principles – 2 respondents	Auerbach, LINX
Conflicts with bylaws / every valid complaint should be heard 3 respondents	Rosenzweig, CCG Delhi, LINX
ICANN policy process takes years 8 respondents	Rosenzweig, NCSG, ISPCP, BC, CCG Delhi, INTA, Dotmusic, LINX
Differentiate policy and administrative decisions – Policy and facially invalid actions	Hill (?), NCSG BC, CCG Delhi
12 months constitutes bias	NCSG

<b>12 months is too short</b>	
5 respondents	Auerbach, Rosenzweig, INTA (2 years), RySG, BC (remove, or min 3 years)
12 months constitutes bias	NCSG
<b>Definitions</b>	
Calendar or business days?	Auerbach
Exclude days for intermediation?	RySG
<b>IOT Process / Next steps</b>	
Moratorium and study	BC, ISPCP
Systematically review/tie to bylaws, new public consultation	LINX
Review effect	ALAC
<b>Other recommendations</b>	
All notice periods, deadlines must be based on dates translated documents available	Perez
IRP should have discretion to hear late claims	LINX
<b>Other arguments</b>	
No justification / arbitrary by IOT	BC, LINX
Limited IRP remedies protect ICANN, make lax time bar tenable	LINX
Abolishing 1 yr would still leave an effective time bar	LINX
Date of implementation insufficient	Rosenzweig, NCSG