

gTLD REGISTRIES STAKEHOLDER GROUP

COMMENTS ON ICANN STRATEGY PANEL ON MULTI-STAKEHOLDER INNOVATION

Date: **30 April 2014**

Public Comment URL: <http://www.icann.org/en/news/public-comment/strategy-panels-25feb14-en.htm>

This statement on the issue noted above is submitted on behalf of the gTLD Registries Stakeholder Group (RySG). The statement that follows was supported by a majority of RySG members, with none opposed and two abstaining.

Introduction

The RySG welcomes the report from the ICANN Strategy Panel on Multistakeholder Innovation and agrees with the premises focused on broadening and strengthening the multistakeholder model. The panel has suggested a number of areas to focus on and also suggests tools, platforms, and structural changes that could make specific engagement and the wider multistakeholder model more inclusive. The RySG is intrigued by many of these but on the whole would like to stress that any experimentation be methodical and include ample preparation and reflection periods to judge the effectiveness of the new approach.

We agree and support the panel's goal to facilitate increased participation in the multistakeholder process. However, the extensive output of this one panel is a challenge for even experienced ICANN participants, including RySG members, to contribute to, not to mention the newcomers and non-contracted parties that this panel ostensibly hopes to reach out to. Considering this panel's work alongside the other three strategy panels, the extensive ongoing work in ICANN policy development activities, the ICANN FY15 Operating Plan and Budget process, New gTLD implementation activities and the global Internet Governance work currently underway, the ability to get broad-based community feedback is extremely challenging. When considered in light of the work of the other three strategy panels, it confirms "[t]he amount of information provided to stakeholders can be a barrier to accessibility . . ." as described in the recently published One World Trust final report (titled 'ICANN Accountability and Transparency Metrics and Benchmarks: Consultancy'). Therefore, we strongly suggest that ICANN and the community keep this in mind when considering any of the recommendations, including proposed timeframes.

The RySG has compiled comments on all 16 of the panel's recommendations. We note that each of the recommendations presented by the panel includes a series of outstanding questions. The community must keep these questions and others that arise here and throughout the comment period in mind if and when it experiments with any of the proposals. Furthermore, many of the panel's characterizations and suggestions remain exceedingly broad and should be reframed to address specific problems with a specific experimental solution before proceeding.

Proposal 1, Use expert networks

From the outset of this discussion the panel seems to assume that a general level of expertise is lacking within ICANN (meaning all of us in the ICANN community) and states that we must “reduce redundant participation and remove vested interests from stakeholder groups and working groups at ICANN.”

We do not know if the specter of “vested interests” includes the large and diverse group of experts found within our own stakeholder group but we reject the apparent suggestion that expertise is somehow antithetical to consistent ICANN participation. The final question asked by the panel is, “What would the framework of accountability for decisions being made by experts look like?” The wording of this question seems to illustrate a lack of understanding on the part of the panel regarding the multistakeholder model. They appear to assume that experts might be making decisions in ICANN and that we could and should somehow identify a group of decision-making experts that would not have “vested interests” within ICANN. Pursuing such an approach would be the end of the multistakeholder model.

Further red flags go up when we read statements like this: “And some have assessed that ICANN’s current working group (WG) model for developing consensus around how to solve such complex problems ‘often appears to be lacking – especially when dealing with complex issues compounded by widely disparate points of view and/or strongly held financial interests in particular outcomes.’” Using experts could definitely enhance the WG model but they should not be viewed as a replacement for the WG model.

We take issue with the fact that in describing this situation and possible solutions, the panel has mixed ICANN’s mission with a much broader Internet Governance (IG) mission. Are the innovations proposed intended for ICANN improvements or more broadly for IG improvements or both? In testing and evaluating them, it will be important to be clear in this regard. To the extent that they are for broader IG improvements, is ICANN the right forum to test them?

The panel seems to believe that it would be good to “Move ICANN from a representation-based to expertise-based organization.” Is it accurate to assume that it is an either-or situation? Are they mutually exclusive? Is there value in combining the benefits of both? A value in a representation-based organization is that it facilitates identifying potential impacts of proposed policies; could an expertise-based organization do that as readily and effectively?

Finally, the potentially relevant networks and communities listed by the panel are predominantly for very technical resources. In the area of domain name policy development, which has been identified as needing improvement, it is not at all clear that technical resources are a big need.

We agree with the underlying premise of this proposal that ICANN “needs to be smart” and hence “it needs access to the best possible ideas in forms and formats that are useful and relevant to the decision at hand from sources inside and outside the institution”. To the extent that this proposal could “Inspire and incentivize collaboration within and across siloed ICANN structures” and “save time and resources”, it is very worthwhile exploring. But the types of expertise focused on in the description of this proposal don’t seem to be very applicable to ICANN’s mission of coordinating Internet technical identifiers.

Proposal 2, Crowdsourcing at each stage of decision-making

The following seems like a valid premise for this proposal: “The legitimacy of a 21st century global institution operating in the public interest depends on whether those affected by the decisions the institution makes are included in the decision-making process.” The detailed description goes on to say: “Especially in the case of the Internet and of ICANN, to be legitimate, anyone must have easy and equitable access to help shape the policies and standards of the Internet that ICANN helps facilitate.” Easy access for all seems like a reasonable ideal to work toward. Equitable access though may be unrealistic. It is a noble goal, but is it achievable in an extremely diverse, global community?

Finding ways of crowdsourcing ideas (“conducting a distributed brainstorm” of ideas) could be useful in ICANN’s policy development activities. If it could be done globally in an efficient and cost-effective manner, it could provide a way to obtain input from stakeholders who might not otherwise be able to contribute and/or it might motivate new parties to participate in ICANN policy work. The RySG supports the idea of using feedback tools and crowdsourcing ideas.

We also support the idea that ICANN should establish a “formal and continuous” presence in other “face-to-face forums such as the Internet Governance Forum (IGF) or Internet Society (ISOC),” and agree that this relationship could result in more representative participation in ICANN itself. We support ICANN in updating other relevant organizations on its activities and defending its role in developing IG conversations. However, we wholeheartedly reject the most recent example of ICANN “representative participation” in the preparations for Netmundial, where ICANN’s CEO has claimed he will represent the whole of the community and ICANN’s contracted parties were not invited to directly participate. The very idea that one individual can represent such a large and diverse community is misguided and his words and actions throughout his tenure have shown that he is not delivering on this promise.

Proposal 3, Crowdsourcing oversight and develop standards to measure success

We continue to support actions that increase ICANN’s accountability, so this idea may be worth exploring further for that reason alone, but it is not immediately clear that it could be effectively implemented. The following briefly describes the concept of this proposal: “. . .using the power of the crowd to evaluate the success of ICANN’s decisions, measured not only in light of ICANN’s core public interest values, but also based on the impact, effect and level of compliance following ICANN’s policy development process.”

We have no argument with the need to develop success metrics as acknowledged by the panel. But it is not clear that those could be successfully developed using crowdsourcing. Furthermore, it is an important inconsistency that many of the panel’s recommendations are predicated on apparently limitless human resources that are willing and ready to be ICANN’s “crowd” despite the fact that one of the panel’s goals is to increase and widen the currently limited participation within ICANN.

The panel does identify some constructive factors that should be considered when developing metrics. Furthermore, two ideas for implementing this proposal in ICANN seem like they have strong potential:

an open peer review platform; online ranking and feedback tools. These seem like useful tools in policy development activities.

One idea that raises red flags from our contracted party perspective is “using open contracting principles, openly post all registry and registrar contracts online (along with other open data sets, such as financial data and existing compliance data) and ask the public to help monitor for compliance by all contracting parties”. It is unclear how this would expand upon the existent public portal related to contractual compliance, (<http://www.icann.org/en/resources/compliance/complaints>). Was the panel aware of this portal? If they are proposing a new system, what would be the impact on registries and registrars if this were done? Could it be done effectively without unduly burdening the contracted parties? How would this affect existing agreements, including those Registry Agreements that ICANN is executing with new TLD registries on a weekly basis? Those agreements are supposed to provide certainty and predictability for the contracted parties. As such, no unilateral action should be taken that could adversely affect the reporting and compliance systems that registries have or are putting in place to meet these agreements. Indeed, many of the RySG’s newest registries remain pre-revenue and have received approval for business plans outlined in their TLD applications that were based on the current state of contracting and compliance.

Proposal 4, Enable collaborative drafting

The following seems like common sense to us if the tools used are efficient and effective: “In order to open itself to broad-based and global participation, *ICANN could leverage collaborative drafting tools* (e.g., wikis), which allow many different people to work on the same document at different times and from different places and often keep a track-record of the history of revisions made to those documents. Such collaborative drafting tools can enable meaningful participation that allows a dispersed community to work together over time to accelerate the path to sharing responsibility.”

The panel says, “When it comes to collaborative drafting tools, these could be deployed to make use of participants identified as experts during the issue-framing stage, or people identified as experts in ICANN’s expert network outreach – either to serve as “moderators” of the discussion or the “owners” of a project.” It is not clear to us why the panel only identifies experts as possible users of collaborative drafting tools. It seems to us that they could be very useful for anyone in a WG in the process of developing policy language.

Collaborative drafting tools could be very useful in GNSO policy development if they are effective and efficient and seem worthwhile investigating further.

Proposal 5, Innovate the Public Forum

The RySG recognizes that the public forum and the interaction of the ICANN Board with the wide community and public is a fundamental part of ICANN’s multistakeholder model. We welcome ideas to improve remote participation; streamline question-asking and opinion aggregation; encourage participant networking; and motivate non-incumbent participants. ICANN could experiment with some of the tools suggested in a methodical manner.

Prior to any experimentation, we encourage ICANN to collect data on the current state of the public forum to support or disprove the panel's claims, such as the assertion that the public forum is dominated by participants who have been involved in ICANN for over a decade and that there is a remarkable lack of new participants. This will allow for a quantitative, baseline understanding of the current state of the forum to be compared against future forums that may feature enhanced participation tools.

Proposal 6, Enhance Decision-Making Legitimacy by Experimenting with Innovative Voting Techniques

The panel's purpose in this proposal is to: "a) make decision-making at ICANN more accessible, and b) empower members of the ICANN community to take thought-leadership roles". In our opinion, these are both very legitimate goals. The panel specifically recommends considering two voting models: Liquid Democracy and Ranked-Choice Voting. A possible advantage listed by the panel for this proposal is that it could "Allow people to organize around topics and issues rather than around their constituencies. For example, in the GNSO, there are a host of different "constituency groups," and people may not always agree with their constituencies on each issue. In this way these methods account for a multiplicity of priorities." Allowing people to organize around topics and issues rather than around their constituencies could have positive and negative consequences. If only individuals were allowed to contribute, it would be necessary to ensure that a critical mass of individuals participated from all impacted groups; that might be difficult to accomplish without the help of the formal constituencies and stakeholder groups. If input is received from constituencies and stakeholder groups as well as individuals who are members of those same constituencies and stakeholder groups who have different views then some way would be needed to weigh the group comments against the individual comments. It would seem to be problematic to count a minority view in a constituency the same as a majority or supermajority view from that group.

Another possible advantage listed for this proposal is that it would "Remedy the fact that those responsible for casting votes (often volunteers) do not have enough time and knowledge to vote meaningfully on every issue." The current model in the GNSO has this same advantage. If the GNSO moved away from constituencies and stakeholder groups, the advantage may go away.

A third advantage listed is that it would "Allow people to bypass the constituency-level vote by choosing not to vote for a Council member but to vote directly on the issue." The panel seems to assume that these innovative voting ideas would mostly benefit voting at the Council level. Voting at the Council level is not really that big of a problem in our opinion. Assessing the views of participants in WGs could probably be a much more useful application of the voting ideas, not in a formal sense of voting because that is probably undesirable in a consensus building approach, but rather as tools to develop positions that most people can support. Also, bypassing the constituency-level vote in WGs would likely make it more difficult to get broad participation of individuals.

One of the pilot ideas for Liquid Democracy is this: "New voting methods could be applied wherever voting currently occurs in ICANN, e.g., at the Council or the Board level. . . ." It is not clear to us that using Liquid Voting for the GNSO Council or ICANN Board adds much value. The current voting methods

seem to work well. But we believe there might be lots of value in using Liquid Voting in policy develop WGs to assess the various views of stakeholders.

One of the pilot ideas for Ranked-Choice Voting is this: “Where SO/AC Councils or ICANN’s Board of Directors must take a vote, it makes sense to use ranked-choice voting to quickly determine which issues or positions win (for example, where the Board has the power to appoint the Nominating Committee Chair . . .” As commented above for Liquid Democracy, it is not clear to us that using Ranked-Choice voting for the GNSO Council or ICANN Board adds much value. The current voting methods seem to work well. But we believe there might be lots of value in using Ranked-Choice voting in policy development WGs to assess the various views of stakeholders.

The open questions listed by the panel for this proposal are very good for the most part but we have concerns about the reference to ‘citizen juries’ in this one: “How can innovative voting techniques be used more broadly, for example by “citizen juries” or to consider issues or their impacts retroactively (e.g., outside of a formal PDP?)” We think the concept of ‘citizen juries’ needs a lot more investigation before being considered seriously. We address this in greater detail in the citizen jury specific proposal (Proposal #13).

Proposal 7, Increase Transparency by Using Open Data & Open Contracting

In the detailed description of this proposal, the panel refers to 11 open contracting principles developed by the Open Contracting Partnership.

It is important to note that the principles were designed for ‘public contracting’, i.e., contracting of government organizations. ICANN is not a government organization so it is important to keep that in mind. At the same time, ICANN, like government organizations, has the responsibility to serve the public so it seems reasonable to apply elements of the principles to ICANN contracting but that means that they should be applied as they fit ICANN contracting needs. This is consistent with the following statement from the Preamble of the principles: “These Principles are to be adapted to sector-specific and local contexts and are complementary to sector-based transparency initiatives and global open government movements.” In other words, the principles need to be adapted to specific ICANN contexts.

Of particular interest to us, are the contracts that ICANN has with gTLD registries and registrars. In that context, we strongly believe that a legal analysis should be done regarding the possible impact if the concept of open contracting was applied to those contracts. The following principles from the 11 raise possible concerns in that regard, understanding that ‘Governments’ should be replaced with ‘ICANN’ in the wording of the principles:

“7. Governments shall recognize the right of the public to participate in the oversight of the formation, award, execution, performance, and completion of public contracts.” It can be argued that ICANN already does this. The registrar accreditation agreements and the base registry agreement for new gTLDs were subject to various public comments and finalized after many iterations. Would introducing ‘open contracting’ change this in any way? Would registries and

registrars incur new costs to support 'open contracting'? Would contractual terms need to be changed?

"9. Governments shall work together with the private sector, donors, and civil society to build the capacities of all relevant stakeholders to understand, monitor and improve public contracting and to create sustainable funding mechanisms to support participatory public contracting." Helping stakeholders to understand contracts with registries and registrars is a reasonable objective and it seems that 'open contracting' could facilitate that. But what would be the implications of stakeholder monitoring under an 'open contracting' model. Would there be risk that registries and registrars would incur new costs to manage and respond to stakeholder monitoring activities?

"11. With regard to individual contracts of significant impact, contracting parties should craft strategies for citizen consultation and engagement in the management of the contract." This sounds like it could result in a new obligation for registries and registrars beyond what many may already do in being responsive to customer needs.

In one of the steps listed by the panel for embracing 'open contracting' it is suggested that "ICANN could put in place an open contracting plan. This requires determination of which ICANN contracts could be subject to an open contracting policy, including registry contracts, registrar accreditation agreements as well as ICANN's procurement contracts." Because of the significance, uniqueness and ongoing nature of registry and registrar contracts, a legal analysis should be done before pursuing 'open contracting' for registry and registrar agreements.

We believe it would be an important sign of ICANN's interest and dedication to this proposal for it to first make its own procurement contracts publicly available (recent examples would include those executed related to new TLD Auctions and new TLD external evaluations provided by the ICC, WIPO, EIU, etc.) and then adopt the 'open contracting' model for its future procurement contracts.

Proposal 8, Increase Accountability through Participatory Budgeting

As stated in the detailed description of this proposal, "Participatory budgeting (PB) is a process which allows citizens ("members," "stakeholders") of an area (region, organization, or some kind of defined group) to participate in the allocation of part or all of the organization's available financial resources." In our opinion, PB could greatly improve ICANN's budgeting process, but it should be understood that PB by itself won't solve the main problem. The main problem for years is that sufficient budget detail has not been provided or has provided too late in the process for public input to be reflected. If this problem is not solved, stakeholders will still not be able to contribute meaningfully even if PB principles are implemented.

Here is one of the suggested Adopting Outcomes provided by the panel: "As community deliberations occur, PB participants could either volunteer (or be chosen through innovative voting techniques) to work as "budget delegates" with the steering committee, ICANN staff and community leaders who are actively involved in budget decisions at ICANN." We think that using one of the innovative voting techniques discussed in other proposals is a very good idea for prioritizing certain budget items.

One of the Open Questions asked by the panel is “How does ICANN decide whether there has been sufficient engagement with the public in budget consultations at present?” Here is our answer: The budget process moves forward based on the Bylaw’s time requirements; it has never mattered whether there was sufficient engagement with the public.

Proposal 9, Impose rotating term limits

It is not at all clear to us that the panel members understood enough about ICANN when making this proposal. They make the case for the value of rotating term limits in a general sense but do not evaluate the ways in which rotating term limits are already implemented in ICANN organizations nor do they identify ways in which those implementations are unsatisfactory. Here are three examples:

1. The RySG limits the terms of its officers.
2. GNSO Council voting seats have two term limits and terms end in different years for each group represented.
3. Board seats are limited to three terms and terms end in different years for different sets of board members.

Proposal 10, Become More Inclusive by Moving from “Stakeholder” Engagement to Global Engagement

In our opinion, there are lots of good ideas in this proposal that would be valuable to test. But to do so will require a lot of time and resources including volunteers who are already stretched thin. The panel has once again made the error of assuming it has already solved the problem of limited participation within ICANN and creates new work for the same group it has characterized elsewhere as insufficiently resourced.

Also, one of the suggestions that community participation should be based on topic rather than stakeholder interest seems to be based on the assumption that “people are more aware of Internet governance issues at large than their specific “stake” in those issues via ICANN.” It is not obvious to us that this is a true assumption; it should be validated before proceeding with this proposal because it seems to be based on this assumption.

Proposal 11 Embrace Evidence

We support ICANN in developing a research function but stress that defining what this means and developing the appropriate structure should be done in continual consultation with the community, i.e., consistent with the multi-stakeholder model.

Proposal 12, Enhance Learning by Encouraging Games

The panel asks lots of good questions but we think there is one overarching question that is missing: How can we introduce gamification principles into ICANN work in a way that can realistically bring about

positive change while recognizing that participants are already overwhelmed? It would be helpful to develop a plan to introduce gamification principles gradually over time and test some of them in existing processes. Any gamification strategy should not compromise the gravity of the work at hand or negatively impact those areas that are not deemed suitable for said games, i.e., by redirecting attention and resources from ongoing or other pressing work. Any use of monetary compensation in connection with gamification should be put to the community.

Proposal 13, Provide an Adjudication Function by Establishing “Citizen” Juries

We empathically agree with the second paragraph of the detailed description for this proposal: “Accountability typically is a consequence of both procedural fairness before the fact and adjudicatory processes after the fact to help ensure that decisions serve established goals and broader public interest principles.”

The panel goes on to say: “As one means to enhance accountability – through greater engagement with the global public during decision-making and through increased oversight of ICANN officials after the fact – ICANN could *pilot the use of randomly assigned small public groups of individuals to whom staff and volunteer officials would be required to report over a given time period* (i.e. “citizen” juries). The panel proposes citizen juries rather than a court system, namely because these juries are lightweight, highly democratic and require limited bureaucracy. It is not to the exclusion of other proposals for adjudicatory mechanisms.”

One of the side benefits of this proposal is a chart developed by T.M. Lenard and L.J. White showing how limited ICANN’s accountability is compared to corporations, governments and other non-profit organizations. The panel presents this information to illustrate why more accountability is needed by ICANN. They later say: “ICANN is not expressly accountable to any well-defined “members” or shareholders.” This is a true and critical statement.

In the Jury Selection section, the panel suggests ways to identify a jurist pool in ICANN, but it seems to us that this would compromise one of the fundamental principles of citizen juries, i.e., random selection. Furthermore, it is not clear that selecting citizen juries for ICANN’s global population will be cost-effective and feasible given that the panel characterizes the use of citizen juries as most often working on “localized issues.” We seriously doubt that truly randomly selected jurors could be trained and understand the issues involved in a comprehensive and resource efficient manner.

The panel gives four successful case studies. Unfortunately, they are all based on localized population in contrast to ICANN’s global population.

In our assessment, the panel makes a fairly good case for the value of some form of citizen juries but they do not do a very good job of demonstrating the feasibility and cost effectiveness in the ICANN environment. It seems like it would take a huge amount of work at a significant cost just to pilot a few programs.

While we do not find citizen juries promising, we still strongly encourage ICANN to prioritize accountability and to work with the community to develop other possible remediation structures. Most recently, RySG members have been party to a significant number of perceived inconsistencies related to the New TLD procedures, such as string similarity, community objection, and related decisions, which could provide appropriate case studies for developing much-needed accountability mechanisms.

Proposals 14, 15 & 16, Become an Effective Participant in the Internet Governance Ecosystem by Decentralizing Accountability, Being Experimental, and Embracing New Evidence and Insights

These proposals recommend “*a distributed governance network*” that addresses the diversity of actors and issues in Internet governance and the variable ways in which ICANN must: a) coordinate its work with other actors, and b) evaluate its own position in the Internet governance ecosystem to the end of becoming an effective participant in the Internet governance process writ-large. . . .”

In considering developing a governance network ICANN should apply these priorities: 1) it should first fulfill its primary mission well; 2) ICANN should obtain community consensus for actions it takes in the Internet governance arena; 3) ICANN should be fiscally responsible in all Internet governance related activities it undertakes and use the resources it receives from the community with their concurrence.

RySG Level of Support

1. Level of Support of Active Members:

1.1 # of Members in Favor:	17
1.2 # of Members Opposed:	0
1.3 # of Members that Abstained:	2
1.4 # of Members that did not vote	10

2. Minority Position(s): None

1. Level of Support – Active Members: Majority
 - Total # of eligible Voting RySG Members¹: 30
 - Total # of Voting and Non-voting RySG Members: 34
 - Total # of Active Voting RySG Members²: 29

¹ All top-level domain sponsors or registry operators that have agreements with ICANN to provide Registry Services in support of one or more gTLDs are eligible for membership upon the “effective date” set forth in the operator’s or sponsor’s agreement (Article III, Membership, ¶ 1). The RySG Articles of Operations can be found at http://gtldregistries.org/sites/gtldregistries.org/files/Charter_of_the_gTLD_Registries_Stakeholder_Group.pdf

² Per the RySG Articles of Operations, Article III, Membership, ¶ 4: Members shall be classified as “Active” or “Inactive”. A member shall be classified as “Active” unless it is classified as “Inactive” pursuant to the provisions of this paragraph. Members become Inactive by failing to participate in a Constituency meeting or voting process for a total of three consecutive meetings or voting processes or both, or by failing to participate in meetings or voting processes, or both, for six weeks, whichever is shorter. An Inactive member shall have all rights and duties of

- Minimum requirement for supermajority of Active Voting Members: 20
- Minimum requirement for majority of Active Voting Members: 16
- Names of Members that participated in this process:
 1. Afilias, Ltd.
 2. Charleston Road Registry (non-voting member)
 3. .CLUB Domains LLC
 4. CORE (non-voting member)
 5. Donuts Inc.
 6. DotAsia Organisation
 7. dotBERLIN GmbH & Co. KG
 8. dotCooperation
 9. Dot Kiwi Ltd.
 10. Dot Latin, LLC
 11. DotShabaka Registry
 12. dotStrategy Co.
 13. Employ Media LLC
 14. Famous Four Media
 15. Fundació puntCAT (inactive)
 16. GMO Registry, Inc. (non-voting member)
 17. ICM Registry LLC
 18. Minds + Machines
 19. Museum Domain Management Association – MuseDoma (inactive)
 20. Neustar, Inc.
 21. Plan Bee LLC
 22. Public Interest Registry - PIR
 23. Punkt.wien GmbH
 24. Punto 2012 S.A. de C.V.
 25. Societe Internationale de Telecommunication Aeronautiques – SITA
 26. Starting Dot Limited
 27. Telnic Limited
 28. The Foundation for Network Initiatives “The Smart Internet”
 29. Top Level Design LLC
 30. Tralliance Registry Management Company (TRMC)
 31. Uniregistry Corp. (non-voting member)
 32. United TLD Holdco Ltd. (non-voting member)
 33. Universal Postal Union (UPU)
 34. VeriSign
 35. XYZ.COM LLC
 36. Zodiac
- Names & email addresses for points of contact
 - Chair: Keith Drazek, kdrazek@verisign.com
 - Alternate Chair: Paul Diaz, pdiaz@pir.org

membership other than being counted as present or absent in the determination of a quorum. An Inactive member may resume Active status at any time by participating in a Constituency meeting or by voting.

- Secretariat: Cherie Stubbs, Cherstubbs@aol.com
- RySG representative for this statement: Chuck Gomes, cgomes@verisign.com, and Andrew Merriam, andrew@tldesign.co.

Regarding the issue(s) noted above, the following position(s) represent(s) the views of the ICANN GNSO gTLD Registry Constituency (RySG) as indicated. Unless stated otherwise, the RySG position(s) was (were) arrived at through a combination of RySG email list discussion and RySG meetings (including teleconference meetings).