

RrSG response to Third Accountability and Transparency Review Team (ATRT3) Final Report

<https://www.icann.org/public-comments/atrt3-final-report-2020-06-16-en>

Public Comment Period closes: 31 July 2020

The Registrar Stakeholder Group (RrSG) welcomes the opportunity to provide comments on the Third Accountability and Transparency Review Team (ATRT3) Final Report. Accountability and transparency are two vital components of ICANN, and are integral in demonstrating that ICANN is a trusted steward of the Internet's unique identifiers. It is the position of the RrSG that the ICANN Board accepts all of the recommendations in this report, and instructs ICANN Org to implement the recommendations. The RrSG notes that the ICANN Community cannot (and should not) be dis-empowered from being able to call for additional transparency and accountability.

As noted in the report, as of November 2019, there were 161 Specific Review recommendations and 164 Organizational Review recommendations (for a total of 325 recommendations) pending. Inaction on these recommendations by the Board represents a waste of resources- in terms of both time of community members and ICANN org budget. It is disheartening for community members to dedicate significant time and effort for reviews, only for ICANN to not implement the recommendations. It is paramount for the accountability of ICANN that the ICANN Board adopt and instruct ICANN Org to implement recommendations from ICANN community reviews. Failure by ICANN to implement the recommendations has a demoralizing effect that further reduces volunteer participation.

As a whole, the RrSG supports the recommendations in the ATRT3 Final Report, and believes that they would improve ICANN's accountability and transparency. ICANN currently has eleven pending reviews, some of which are ongoing for more than two years. This can lead to volunteer fatigue, duplication and overlap of efforts, and impacts ICANN's ability to timely implement these recommendations. Consolidating reviews will work to ensure greater community involvement, increase efficiency, and reduce the overall cost for ICANN. Additionally, providing a mechanism for the ICANN community to provide feedback and guidance for prioritization of implementing review recommendations ensures additional accountability and transparency for ICANN.

The RrSG has additional feedback to provide to ICANN to improve the ATRT3 Final Report:

- Regarding Holistic Reviews, the RrSG recommends that they be conducted more frequently than every eight years. For example, there have been significant changes to the ICANN org and ICANN community between 2012 and 2020. Conducting Holistic Reviews every three years may improve the efficiency of the reviews, and reduce the scope.
- For reviews and self-improvement conducted by (and for) the Supporting Organizations (SO), Advisory Committees (AC), and the Nominating Committee, the RrSG recommends that the continuous improvement efforts be more than just self-implemented. There

should be opportunities for external feedback and comments (from other SOs and ACs), which should be incorporated into the improvement efforts. The RrSG is concerned that previous feedback for reviews of SOs/ACs have been ignored. Thus, there should be a mechanism introduced that requires the implementation of review recommendations and/or a process by which the SO/AC in question must adequately prove why implementation is not workable.

- The RrSG would like clarification on whether the Holistic Review will involve a formal audit process, whether such audits will be internal or external, and if there is a formal audit, then it should conform to an ISO standard (e.g. ISO 19011).

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