



International  
Trademark  
Association

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Via email: [comments-north-america-engagement-plan-fy21-25-19may21@icann.org](mailto:comments-north-america-engagement-plan-fy21-25-19may21@icann.org)

July 2, 2021

Mr. Joseph Catapano  
Manager, Stakeholder Engagement  
ICANN  
801 17<sup>th</sup> Street, NW, Suite 400  
Washington, DC 20006

Re: [INTA Comments on the Draft North America Engagement Plan FY21-25](#)

Dear Mr. Catapano:

INTA is pleased to submit its comments regarding the Draft North America Engagement Plan FY21-25 (the “NAEP”). INTA appreciates the work of the Global Stakeholder Engagement (GSE) North America team and generally supports the recommendations within the NAEP. INTA recognizes the importance of ongoing outreach and engagement on issues critical to ICANN’s mission and is pleased to help encourage engagement at all levels. Many INTA members are actively engaged in ICANN’s working groups and governance structure.

While INTA supports ICANN’s overall outreach efforts, INTA has additional questions and suggestions for the GSE North America team to consider as it finalizes the NAEP. Certain terms require additional clarification, particularly the definition of “relevant stakeholders” to ensure appropriate inclusion. We are also concerned about the appropriate measures for KPIs and that qualitative as well as quantitative analysis be considered. Our specific comments regarding the NAEP are included as an attachment and follows the format of the proposal. We look forward to contributing to further iterations of this plan.

#### About INTA

INTA is a global not-for-profit association with more than 7,200 member organizations from over 187 countries. One of INTA’s goals is the promotion and protection of trademarks as a primary means for consumers to make informed choices regarding the products and services they purchase. During the last two decades, INTA has also been the leading voice of trademark owners within the Internet community, serving as a founding member of the Intellectual Property Constituency of the Internet Corporation for Assigned Names and Numbers (ICANN). INTA’s Internet Committee is a group of over 175 trademark owners and professionals from around the world charged with evaluating treaties, laws, regulations and procedures relating to domain name assignment, use of trademarks on the Internet,

and unfair competition on the Internet, whose mission is to advance the balanced protection of trademarks on the Internet.

Thank you for your consideration of INTA's comments. If you have any further questions or comments regarding this submission, please feel free to contact Lori Schulman, Senior Director, Internet Policy at [lschulman@inta.org](mailto:lschulman@inta.org) or +1(202)704-0408.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Etienne Sanz de Acedo". The signature is fluid and cursive, with a long horizontal stroke at the end.

Etienne Sanz de Acedo  
Chief Executive Officer

Attachment

Attachment

INTA Comments on the Draft North America Engagement Plan FY21-25

ICANN Strategic Plan Goal	Proposed Engagement Area	Target Outcomes	Key Performance Indicators
<b>Strategic Objective 1: Security</b>			
<p>1.1 Improve the shared responsibility for upholding the security and stability of the DNS by strengthening DNS coordination in partnership with relevant stakeholders<sup>[-1]</sup></p> <p><b>INTA Comment: <sup>[-1]</sup> Who is considered a relevant stakeholder? Does this include law enforcement authorities (LEA), cybersecurity, brand owners/brand protection professionals? Are any of these groups not intended to be part of the relevant stakeholders category? Are</b></p>	<p>Partner with the community and the OCTO team to contribute to and raise awareness about ICANN's technical stature and work including:</p> <ul style="list-style-type: none"> <li>• DAAR</li> <li>• KINDNS</li> <li>• ITHI<sup>[-2]</sup></li> </ul> <p><b>INTA Comment: <sup>[-2]</sup> These acronyms could be defined. Raising awareness and engagement starts with properly communicating concepts that may be well-understood by ICANN insiders but not casual observers or those external to</b></p>	<p>Greater participation from the community in such technical projects.</p> <p>Better communication of data produced by the tools<sup>[-3]</sup></p> <p><b>INTA Comment: <sup>[-3]</sup> Consider a single ICANN web page dashboard for all DNS abuse and security related tools and reports / studies / data.</b></p>	<p>Opportunities to inform stakeholders about projects and solicit participation<sup>[-4]</sup></p> <p>Measure outreach to new stakeholders beyond existing participants in ICANN</p> <p><b>INTA Comment: <sup>[-4]</sup> How is this measured in order to serve as a KPI? Is this just the number of times stakeholders were informed about these matters? Or is a different means of measuring intended for this proposed KPI?</b></p>

<p><b>there other stakeholders envisioned here?</b></p>	<p><b>the ecosystem.</b></p>		
<p>1.3 Identify and mitigate security threats to the DNS through greater engagement with relevant hardware, software, and service vendors[--5]</p> <p><b>INTA Comment: [--5]Does this include IP enforcement given the use of brands as a common attack vector for abuse, including phishing, pharming, malware, and use of brands in domain names to host abusive content?</b></p>	<p>Engage with the community on DNS threats by participating in events and partnering with other organizations [--6] to combat DNS Abuse</p> <p><b>INTA Comment: [--6]What kinds of organizations? INTA would be willing to partner with ICANN to discuss use of trademarks as an attack vector for DNS abuse.</b></p>	<p>ICANN Org and community engaged with the right actors [--7] to share best practices and information about DNS Abuse</p> <p><b>INTA Comment: [--7]Who are the “right actors”? This should be specified.</b></p>	<p>Number of sessions organized in partnership with ICANN departments to deliver to the community on this topic, audience size.</p>

## Strategic Objective 2: ICANN's Governance

<p>2.1 Strengthen ICANN's bottom-up multistakeholder decision-making process and ensure that work gets done and policies are developed in an effective and timely manner[--8]</p> <p><b>INTA Comment: [--8]Organizational restructuring of GNSO is critical to ensure appropriate empowerment of non-contracted party stakeholders; in particular, current reduction of Business, IP, and ISP interests into the CSG structure improperly marginalizes each of these groups, which collectively are co-equal to the NCSG. This vastly diminishes the voice of the private commercial sector and results in policymaking that frequently ignores the needs of these essential sectors.</b></p>	<p>Conduct outreach with issues that potential stakeholders are interested in and encourage participation in Working Groups and PDPs</p> <p>Develop more issue-based content</p> <p>Survey potential stakeholders to find out what are the issues that they are interested in pursuing</p>	<p>Produce written and online content</p> <p>Work with departments such as OCTO, GE, and Comms to support PDP and WG goals</p> <p>Prepare report with survey results and recommendations to move forward</p>	<p>Number of documents or pieces of content produced[--9]</p> <p><b>INTA Comment: [--9]This is a useful data point, but need to ensure quality over quantity. We appreciate that quality is more subjective.</b></p>
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<p>3.4 Support the continued evolution of the Internet’s unique identifier systems with a new round of gTLDs that is responsibly funded, managed, risk-evaluated, and consistent with ICANN processes</p>	<p>Conduct events to promote awareness of new round of gTLDs<sup>[--10]</sup></p> <p>Promote awareness of universal acceptance in preparation of more new gTLDs, such as events with the software development communities</p> <p><b><i>INTA Comment: [--10]If ICANN is going to play a role in generally promoting awareness of new gTLDs, promotion of .Brands should be part of such awareness and education; what is ICANN doing/planning to do to increase awareness regarding .Brand TLDs among major companies?</i></b></p>	<p>Community is aware of status and timeline for new rounds of gTLDs</p> <p>Community actively engaged in issues and remediation of universal acceptance</p>	<p>Number of events focused on evolution of the unique identifier systems</p> <p>Audience size in such events</p> <p>Follow up activities with relevant actors to further promote UA</p>