

## Submission of the ccNSO Council on the R3 White Paper

January 2013

The ccNSO Council commends At-Large for initiating the discussion on the important topic of whether the present ecosystem of Internet Governance, including ICANN, is able to adapt to recent changes in the ecosystem and welcomes the opportunity to provide comments on the white paper for discussion on "Making ICANN Relevant, Responsive and Respected" (R3 White Paper).

It is the understanding of the Council that the authors seek to address questions on whether the present ecosystem of Internet governance, including ICANN, is able to adapt to recent changes in the ecosystem that have taken place, and more specifically, within the following four areas:

- The global public interest
- The multi-stakeholder system
- Global governance
- Institutional and practical cooperation.

In the document, the authors suggest a number of recommendations on how the challenges within each of these areas might be addressed. The following, proposed recommendation relating to Multi-Stakeholder System, has drawn the attention of the ccNSO Council:

***“Address the ccTLD diversity of practices vis-à-vis ICANN’s general standards and best practices”.***

According to the authors of the R3 White Paper, ICANN’s value proposition and strength is its multi-stakeholder, bottom-up policy development model. However, again according to the authors: ‘ICANN has neglected to improve this model to meet the differentiated demands. The proliferation of constituencies and stakeholder groups has not been accompanied by real efforts to achieve and maintain equality and balance among the various interests in the ICANN structure.’

It is the belief of the ccNSO Council that the proposed recommendation does not reflect and take into account the fundamental premises underlying ccTLD’s and the ccNSO:

- The ccTLD’s were created to meet the political, economic, legal and cultural differences of countries and territories, and the diversity in local communities, including local government and end-users. This fundamental premise is not just reflected in the current policy for the delegation of ccTLD’s and IDNccTLD’s, but is also the main principle of the Government Advisory Committee Principles and Guidelines for the Delegation and Administration of Country Code Top Level Domains.

- The diversity in practices across the ccTLD community and vis-à-vis ICANN's general standards and best practices are the outcome of local multi-stakeholder, bottom-up policy development processes, which involves the local government, end-users and other stakeholder groups.
- One of the major contributions of the ccTLD community to ICANN is to bring to the table this diversity and the embedment of ccTLD's in local multi-stakeholder, bottom-up policy development models.
- The structure and functions of the ccNSO and its limited scope for policy development are a reflection of the different roles and responsibilities of ICANN and ccTLD's (including both ASCII and IDN) vis-à-vis ICANN and (new) gTLD's.

The ccNSO Council therefore urges the striking of the proposed recommendation relating to the diversity of ccTLD's, as it does not serve the purpose of strengthening the multi-stakeholder model – it has completely the opposite effect.

On behalf of the ccNSO Council,

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Chair