



UNITED STATES COUNCIL FOR INTERNATIONAL BUSINESS

February 21, 2014

Ms. Larisa Gurnick  
Internet Corporation for Assigned Names and Numbers  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536

VIA ELECTRONIC TRANSMISSION

**Re: Second Accountability and Transparency Review Team (ATRT2) Final Report & Recommendations**

Dear Ms. Gurnick:

The US Council for International Business (USCIB) is pleased to respond to ICANN's January 9 solicitation of comments on proposed Final Recommendations resulting from the second Accountability and Transparency Review (ATRT2), mandated by the Affirmation of Commitments. USCIB is a trade association composed of multinational companies, law firms, and business associations, which includes a broad cross-section of the leading global companies in the information and communications technology (ICT) sector. USCIB members therefore welcome this opportunity to offer the business community's perspective on the ATRT2's final recommendations.

USCIB members have decided to focus on selected report recommendations. These generally address issues and concerns we raised in our May 1, 2013 comments on questions posed by the ATRT2 as well as our December 4, 2013 comments on the draft recommendations. We respectfully request that you consider the following:

1. ATRT1 Recommendation 6 – Undertake initiatives to enhance understanding and transparency of Board Deliberations
  - We appreciate that the final ATRT2 recommendations recognize our concerns regarding the lack of clarity between the “policy” and “implementation” distinctions. We agree with the final recommendations that the terms either need to be consistently used or changed. We believe, however, that the recommendations still need to go further. Instead of simply stating that the community needs to develop an “understanding of the distinction” between the two models, the final recommendations should clearly call for formal criteria to be put in place to distinguish between policy and implementation matters. The Board, the staff, and the community should be able to know, in advance, under which category a certain matter would fall, based upon agreed criteria.
2. ATRT1 Recommendations 9-14 – Addressing GAC-Board relations
  - We thank the final recommendations for agreeing that substantial changes are needed in GAC processes, as improving GAC transparency and clarity is the most important ATRT2 issue for business stakeholders. We believe that improving GAC processes is critically important, and we thank the ATRT2 for recognizing this issue.

3. ATRT1 Recommendations 15-17 – Pertaining to improving public notice and comment procedures
  - We still do not believe that the final recommendations on these issues go far enough. The Board should not just “explore mechanisms to improve” the public comment time allotments. The final recommendations should instead specifically state that longer public comment periods are needed. We ask that the final recommendations include greater specificity and a call to action aimed at improving public notice and comment procedures.

USCIB appreciates this opportunity to provide input on final recommendations and asks that our comments receive ICANN’s due attention.

Sincerely,



Barbara P. Wanner  
Vice President, ICT Policy

cc: Peter Robinson, President  
Robert Mulligan, Senior Vice President, Policy and Government Affairs