**Comments on Second Accountability and Transparency Review Team (ATRT 2) Final Report & Recommendations**

China Internet Network Information Center (CNNIC)
2013/01/27

On behalf of China Internet Network Information Center (CNNIC), hereby we would like to take this opportunity to make comments on ICANN's ATRT2 final report. Generally speaking, we highly support most of the new ATRT2 recommendations and appreciate the review team's lasting efforts for identifying the key issues on accountability and transparency of ICANN that need to be addressed in the future. However, there is still room for further improvement.

1 For ATRT2 Recommendation 7

"Explore mechanisms to improve public comment through adjusted time allotments, forward planning regarding the number of consultations given anticipated growth in participation, and new tools that facilitate participation."

We agree with this recommendation for improving the public comment participation. But these adjusted time allotments and planning still not guarantee the effective participation from the community. ICANN need to build up more active public consultation process for gathering opinions from the public. Especially, ICANN needs to encourage underserved community members to directly participate in the policy development process and provide information update for the people who have submitted the comment. This will encourage more participation from the public.

We also notice that ICANN is already planning to develop new tools that facilitate participation. While we are looking forward to the adoption of innovative tools which enables easier public participation. The design of the tools needs to be cautiously over-watched in order to avoid chances of decision capture. The new tools needs also accompany with continuous efforts to educate people from the underserved region and let them know how to make more effective participation. The function of user education also needs to be integrated in the new tool.

2 For ATRT2 Recommendation 10
" Improve the effectiveness of cross community deliberations"

An objective and reliable mechanism should be developed to examine the effectiveness of cross community deliberation. We contend that ICANN should develop a set of benchmarks to define effective cross community deliberation. At least, there should be a survey among key stakeholders to examine the diversity of participation, community awareness, and outcome satisfaction of the policy redevelopment process. With this notion, further study is needed to develop an

effective benchmark of effective cross-community deliberation.

In addition, we notice that Global Stakeholder Engagement (GSE) Team is currently working on regional approaches for internationalization of ICANN. We highly appreciate the current work done by our regional GSE staff as they have already developing, implementing or exploring developing regional strategies, depending on the needs and priorities of the regions. We also agree that those regional strategies can embrace the need of ensuring global participation from under-represented geographical regions, non-English speaking linguistic groups, those with non-cultural traditions and those with a vital interest in ICANN operation issues. At present, ICANN should create clearer plan of how to encourage regional stakeholder engagement and how to respond to their needs in a more equitable way. To genuinely touch this area, we urge ICANN to improve the variety of representation in ACs and SOs, and create various forms of collaboration with local business entities and non-profit organizations.

Finally, we highly appreciate ATRT2's achievements so far. On the basis of that, we sincerely urge ICANN to fulfill its bottom-up and community-oriented operating model by allowing more participation from the community.


**[About CNNIC]**

China Internet Network Information Center (abbreviated as CNNIC) is an administration and service organization set up on June 3, 1997 upon the approval of the competent authority and undertakes the responsibilities as the national Internet network information center. In light of the policies of "providing efficient and application-oriented services through secure & stable Internet infrastructure for public interests", CNNIC, as an important constructor, operator and administrator of infrastructure in Chinese information society, is responsible for operation, administration and services of fundamental Internet resources, undertakes R&D and security work of fundamental Internet resources, conducts research on Internet development and provides consultancy, and promotes the cooperation and technological exchange of global Internet.