

22. november 2013

/jukacz-erst

## **Danish Comments to the Accountability and Transparency Review Team 2 Report of Draft Recommendations for Public Comment**

Denmark welcomes the opportunity to provide comments to the ATRT2 Report of Draft Recommendations.

Denmark would also like take this opportunity and thank the ATRT2 for their dedicated work in carrying out this important task.

We have read the ATRT2 Report of Draft Recommendations with great interest and it is our general view that the report contains a series of substantial recommendations with the potential of improving ICANN's over all accountability and transparency.

Denmark is also pleased that the ATRT2 report addresses the issues, which have been prioritised by us and other governments, including transparency and accountability of ICANN's financial operations, outreach to the wider global internet community, and ensuring active participation from all regions of the world. The ATRT2 recommendations in this regard are paramount to ensuring ICANN's global legitimacy.

To this end we would like to highlight the importance of Draft New Recommendation number 9 on page 35-36, particularly third and fourth bullet about making ICANN's work relevant for all stakeholders of the world and ensuring that local enterprises and entrepreneurs fully and on equal terms can make use of ICANN's services, including new gTLDs. We would also like to stress the importance of the Proposed New Recommendations on Finance Accountability and Transparency on page 65-66 in reviewing and improving ICANN's financial governance.

Moreover, we believe, the report from InterConnect Communications (ICC) on the effectiveness of the GNSO PDP contains important findings to ensure active participation from the global internet community and in ensuring that ICANN's policies are developed in the global public interest in accordance with ICANN's mandate. So in addition to the ATRT2 recommendations based on the ICC report, ICANN should further study and use the ICC report actively in its further work.

With regard to the conclusion of the ATRT2 report that several of the previous AOC recommendations are still due to be implemented, Denmark expects ICANN to continue this important work.

### **DANISH BUSINESS AUTHORITY**

Dahlerups Pakhus  
Langelinie Allé 17  
DK-2100 Copenhagen  
Denmark

Tel. +45 35 29 10 00

Fax +45 35 46 60 01

CVR-no. 10 15 08 17

erst@erst.dk

www.erst.dk

*Prioritising the AOC Reviews*

In line with our previous comments to the ATRT2 process, Denmark believes it is essential to the global legitimacy of ICANN and the multistakeholder model that accountability and transparency mechanisms are institutionalised into all parts of the organisation. The Affirmation of Commitment Reviews are instrumental to achieving this and it is therefore essential that ICANN prioritise and institutionalise the AOC Reviews in the organisation's governance structures.

We are therefore pleased to note that the report contains recommendations pertaining to the effectiveness of the AOC review process in ICANN's governance mechanisms.

ICANN should also ensure that all its strategic initiatives, including the Strategic Plan, Strategy Panels and the ATRT2 review, are duly coordinated.

Moreover, all strategic initiatives should be developed on the basis of ICANN's mandate to act in global public interest and to ensure added value to the global internet community. The ICANN Board should therefore, together with the ATRT2, governments and the rest of the community, discuss how this could be done most effectively.

*Ensuring effective implementation of the ATRT2 recommendations*

In conclusion, it is now essential for ICANN to effectively implement the recommendations in close collaboration with the community with the view of ensuring continued trust in ICANN and the multistakeholder model.

Denmark is in support of the multistakeholder approach and has participated actively in both the ATRT1 and ATRT2. We will continue to follow closely ICANN's continued implementation of previous AOC reviews and working together with ICANN through the GAC in ensuring a swift and effective implementation of the ATRT2 recommendations.

Lastly, in acknowledging the important work of the ATRT2 and the AOC reviews in general, we urge ICANN to actively communicate to the wider global community about the ATRT2 Report of Draft Recommendations and the possibility to provide input to the process. We believe it is very important to engage as many people as possible in the AOC review processes.

Yours sincerely,



Finn Petersen  
Deputy Director General