

中国通信学会关于 ATRT2 审查报告的评论意见

作为全球互联网的技术协调机构，ICANN 负责互联网关键资源的日常管理，对互联网的安全稳定运行负有重大责任。ICANN 真正提升问责与透明度，是有效履行协调全球互联网关键资源职责的基础。因此，我们欢迎各方对于目前正在进行的问责和透明度审查所作的相关努力。我们首先感谢 ATRT2 开展的问责和透明度审查工作，并借此机会对 ATRT2 审查报告提出如下评论意见。

1. 识别审查建议的优先级

在审查报告当中，ATRT2 再次提出了一系列建议。我们认为，审查组有必要对所提建议设置优先级，以便后续有效落实。ATRT2 在布宜诺斯艾利斯大会期间就优先级的问题广泛征求意见，各方对设置优先级并无异议。然而在如何识别优先级的问题上，审查组并未给出明确方法。我们认为，识别审查建议的优先级应当从问题的重要性和紧迫性两个维度综合考虑，并且两个维度缺一不可。

2. 制定审查建议落实计划

ATRT1 曾于 2010 年提出了 27 条建议，但三年后这些建议的落实情况并不尽如人意，ICANN 也未能向 ATRT2 和社群有效说明在问责和透明度方面取得明显改进。考虑到 ATRT1 建议落实不佳的状况，为了避免这种情况再次发生，希望 ICANN 理事会

和职员能够针对 ATRT2 的审查建议制定并公布执行计划，以便各方共同监督 ATRT2 建议的落实。

3. 有关 GAC 建议的落实责任

在与社群互动过程中，有关 GAC 建议的落实成为关注重点。我们注意到，ATR2 在与 ICANN 理事会和 GAC 交流中，一些 ICANN 理事及 GAC 代表对如何落实与 GAC 有关的建议以及落实的责任主体存在疑义。有关 GAC 建议的落实责任不清将影响审查建议的执行效果，因此，我们建议要尽快明确落实 GAC 有关建议的责任主体。

4. 持续改进问责与透明度

ICANN 向真正的国际组织迈进，持续改进问责和透明度是必要条件之一。根据咨询机构 InterConnect Communications 的调查，ICANN 主要以北美洲人员为参与主体。从 ICANN 内部工作组参与情况看，北美与会人员约占 75%，欧洲与会人员约占 15%，亚洲、非洲、南美洲参会人员总共才占 10%，反映了 ICANN 在社群参与方面存在严重的不平衡。在语言翻译方面虽有改善，但在翻译的准确性和及时性上仍显不足。我们了解到 ATRT2 也通过 ICANN 向各国政府发出征求意见函，但收到的回复寥寥无几，说明很多国家政府对 ICANN 的认可度并不高。新通用顶级域计划启动以来，ICANN 向申请人收取了大量资金，近一段时期 ICANN 又在大张旗鼓地推进国际化，ICANN 组织机构和人员大幅膨胀。很多利益相关方指出 ICANN 存在资源浪费、资金使用

不当的问题。无疑，ICANN 在这方面的风险越来越高，应更加重视加强问责与透明度。ICANN 在巴西互联网峰会当中的作用受到所有利益相关方的关注，ICANN 虽然在布宜诺斯艾利斯大会期间召开说明会，但仍未打消人们的猜测与质疑。更为重要的是，ICANN 在处理该事件过程当中并没有遵循多利益相关方的方法，降低了人们对于多利益相关方模式的信心。总之，ICANN 在提升问责和透明度上还有很长的路要走，在改进问责和透明度的道路上没有终点。

Comments on ATRT2 Report by China Institute of Communications

As the technical coordination entity of the Internet, ICANN, which conducts day-to-day management of the Internet critical resource, is responsible for security and stable operation of the Internet at a large extent. The substantive improvement of the accountability and transparency is the basis that ICANN can rely on to effectively carry out duties of coordinating the global critical Internet resource. Therefore, all related efforts of the ongoing review regarding accountability and transparency of ICANN are welcomed. We would like to thank all members of ATRT2 who devoting themselves into the accountability and transparency process and take this opportunity to comment on the draft report of ATRT2.

1. Prioritizing ATRT2 recommendations

In the report, ATRT2 put forward again a series of recommendations. We see that the ATRT2 tried to prioritize the proposed recommendations so as to facilitate effective implementation. ATRT2 solicited comments on prioritization at ICANN Buenos Aires meeting which reflected that stakeholders recognize the importance of this action. However, there is no conclusion by ATRT2 or by stakeholders on the approach to prioritize ATRT2 recommendations. We suggest identifying the priority based upon importance and urgency each of the two dimension is indispensable.

2. Establishment of Implementation Plan

It's been three years since the ATRT1 put forward 27 recommendations. However, the implementation of these recommendations is not that satisfactory. ICANN is also unable to prove actual progress that has been achieved with regard to accountability and transparency. To prevent this situation from happening again, ICANN board and management team should establish and publish an implementation plan with regard to ATRT2 recommendations. Accordingly all stakeholders will be able to oversee the implementation of ATRT2 recommendations.

3. Responsibility of GAC Related Recommendations

In the interaction with the community, the implementation of GAC related recommendations draw much attention. We noticed that, in the interaction between ATRT2 and the community in Buenos Aires, some ICANN board members and GAC representatives questioned the approach and responsibility to implement GAC related recommendations. The ambiguity of responsibility of GAC related recommendations will affect the follow-up execution. For this reason, we suggest a responsible body for implementing GAC related recommendations should be identified as early as possible.

4. Enhancing Accountability and Transparency Persistently

If ICANN transforms itself into a real international organization, one

of the prerequisite is to enhance its accountability and transparency persistently. Referring to the survey of InterConnect Communications, the external consultant hired by ATRT2, ICANN is dominated by participants from North America. With regard to the working group participation, participants from North America account for 75%, participants from Europe take up 15%, whereas, participants from Asia, Africa and South America in total account for 10%. These numbers show the significant imbalance of community participation. Even if the improvement on translation/interpretation does exist, the timeliness and accuracy of translation/interpretation requires ICANN to take further actions. It is also known that ATRT2 sent out letters to many nation states but scarcely received any response which leads to the assumption that ICANN is not yet recognized by nation states around the globe. Since the launch of New gTLD program, ICANN had been receiving large amount of application fee. At the same period, ICANN headed for internationalization with great strides and rapidly expanded its personnel and institution. Stakeholders pointed out that ICANN use its resource and fund inappropriately. Without question, ICANN is facing higher risk in this aspect and should put further emphasis on accountability and transparency. The role of ICANN in Brazilian Internet Summit attracted a lot of attention by all stakeholders. Although ICANN held a sudden meeting early in the morning in Buenos Aires for explanation, the doubt

and suspicion had not been blown away. More importantly, stakeholders argued that ICANN did not adhere to multistakeholder approach when taking actions in the affair which undermined the confidence of people into multistakeholder approach. In conclusion, ICANN has a long way to go on the road of promoting accountability and transparency and the road has no end.