24 September 2015

Subject: SSAC Comments Related to the CCWG Meeting on Enhancing ICANN
            Accountability September 25 and 26, 2015

The Security and Stability Advisory Committee (SSAC) would like to once again express
our thanks for the ability to comment on the work that the CCWG is providing on
Enhancing ICANN Accountability (CCWG). We, as one of the chartering organizations
of the CCWG do take the work seriously and have two of our members appointed to
participate, Julie Hammer and Lyman Chapin. Unfortunately they cannot, as it seems
today, participate at the upcoming meeting in California, USA. We therefore send these
general comments.

We would like to reiterate our comments given in SAC071[1], and specifically the
comments and questions related to structures of any kind that require voting mechanisms
that might arise of the work from the CCWG.

The SSAC would like to repeat SAC069[2] Recommendation 2, where the SSAC calls on
each of the communities to review and (if necessary) enhance its policy development
process to ensure that all of the instructions that it provides to the IANA Functions
Operator are clear and implementable. The SSAC continues to believe that the
Framework of Interpretation Working Group's Final Report should be adopted and
implemented as soon as possible by ICANN. This is originally brought up in SAC-069,
and repeated in SAC072[3] in the Executive Summary as point 3b, and in the main
document section 3.2.

We also would like to encourage CCWG to repeatedly and carefully look at what
outstanding issues are related to the IANA Transition itself (i.e. the expiration of the
contract between NTIA and ICANN related to the operations of the IANA Function at
ICANN), and what issues are more general ICANN Accountability issues.
The SSAC does understand that there are questions about whether issues in "Track 2"
will be addressed at all, but that should not be the argument for including things in

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[1] https://www.icann.org/en/system/files/files/sac-071-en.pdf
[2] https://www.icann.org/en/system/files/files/sac-069-en.pdf
[3] https://www.icann.org/en/system/files/files/sac-072-en.pdf

"Track 1" that do not belong there. Instead, mechanisms should be identified that ensure "Track 2" issues are addressed.

As previously observed, the SSAC notes the relatively short time available for consideration of the draft proposal, driven by a timeline set by external events such as the expiration of the contract between NTIA and ICANN related to IANA. Accordingly, the SSAC reserves the right to make additional comments as further details are developed.

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