Thank you for the efforts of CCWG. I will give my corresponding comments (words in black color) according to the Public Comment Input guideline of CCWG report (words in red color) as follows:

**Do you believe the set of Work Stream 1 proposals in this interim report, if implemented or committed to, would provide sufficient enhancements to ICANN's accountability to proceed with the IANA Stewardship transition? If not, please clarify what amendments would be needed to the set of recommendation.**

The existing CCWG proposal is trying to solve two problems: (1) The membership mechanism is to empower the community; (2) The IRP Panel is to establish a mechanism of power separation: Empowered Communities make rule, ICANN board executive and IRP Panel make judgment. Those first two steps are very important and a good start. But the problem of ICANN Accountability and Transparency is still not fully solved yet. ICANN Accountability mechanism should answer: What to do if ICANN makes the wrong decision? This question related to three important parts: (1) What is a wrong decision? (2) Is it really wrong? (3) How to deal with the wrong decision? This proposal did not answer well yet. The reasons and my comments (words in black colors) will be followed with the questions in the Public Comment Input guideline of CCWG report (red color words).

(1) What is a wrong decision?

Fundamental Bylaws

3. Do you agree that the introduction of Fundamental Bylaws would enhance ICANN's accountability?

4. Do you agree with the list of requirements for this recommendation, including the list of which Bylaws should become Fundamental Bylaws? If not, please detail how you would recommend amending these requirements.

According to the current proposal, I agree that the introduction of Fundamental Bylaws would enhance ICANN's accountability. Because if we say something is wrong, we should have right criteria, which should be the Fundamental Bylaws. Although ICANN has Bylaws now, there are still many problems. This proposal should point out these problems and give specific amendments. For example, many problems have already been raised by the communities: the transparency of Nomcom, the representativeness of the ICANN Board of Directors (It is questionable whether board members selected from each community represent the community or just themselves), the ICANN Board membership and voting rights issues, which law should ICANN follow. It is critical to have Bylaws under the ground of community consensus, because it is the criteria to judge whether ICANN does sth wrong or right decision. If the criteria is problematic, it is impossible to discuss about the latter issues.

(2) Is it really wrong?

Independent Review Panel Enhancement

5. Do you agree that the proposed improvements to the IRP would enhance ICANN's accountability? Do you agree with the list of requirements for this recommendation? If not, please detail how you would recommend to amend these requirements.

According to the existing design, IRP Panel is the judge to determine. The independence of IRP is very important. IRP Panel should not belong to ICANN Board, and should not only report to the ICANN Board (I think there is a translation problem in Chinese version. According to the current Chinese translation, IRP Panel only reports to ICANN Board. I see English is different) and should be binding upon the ICANN Board. To emphasize again, the mechanism should ensure that IRP must make independent and impartial decisions. Moreover, the Panel should make clear decision, including pointing out who is wrong, as well as the reasons. In addition, it is necessary to have re-appeal procedure.

(3) How to deal with the wrong decision?

Reconsideration Process Enhancement

6. Do you agree that the proposed improvements to the reconsideration process would enhance ICANN's accountability? Do you agree with the list of requirements for this recommendation? If not, please detail how you would recommend to amend these requirements. Are the timeframes and deadlines proposed herein sufficient to meet the community's needs? Is the scope of permissible requests broad / narrow enough to meet the community's needs?

I agree that the proposed improvements to the reconsideration process would enhance ICANN's accountability. But the list of requirements for this recommendation is not enough. The proposal only empowered community the power to remove ICANN Board of Directors and recall of the Board. But apparently, not all the wrong decisions need to use the two measures, only for extreme situation. Actually, other punitive measures/solutions mechanism/regulation could be considered.

Mechanism to empower the Community 7. What guidance, if any, would you provide to the CCWG-Accountability regarding the proposed options related to the relative influence of the various groups in the community mechanism? Please provide the underlying rationale in terms of required accountability features or protection against certain contingencies.

Even if the IRP determined that ICANN is wrong, how to deal with the wrong decision? The existing proposal did not clarify this part. There are two options to solve this problem: First option is to develop a set of punishment measures and be written into Bylaws by the communities. Second, do not develop a set of punishment measures. ICANN Bylaws only includes the ground of the two extreme cases. For specific cases, communities propose specific solutions and then vote.

Incorporating the Affirmation of Commitments into the ICANN Bylaws

13. Do you agree that the incorporation into ICANN’s Bylaws of the Affirmation of Commitments principles would enhance ICANN's accountability? Do you agree with the list of requirements for this recommendation? If not, please detail how you would recommend to amend these requirements.

It ‘s not reasonable to fully incorporation all the principles of AOC into Bylaws. It’s a possible option to abolish AOC and put some appropriate principles of AOC into ICANN Bylaws. Because on the one hand, some principle in AOC could regulate ICANN, such as “Require the ICANN Board to consider approval and begin implementation of review tam recommendations, including from previous reviews.” But the word “Consider” is too weak. Language should be changed in this principle and ICANN Board "must" implement in time. On the other hand, AOC also some terms are questionable by communities, such as ICANN commit to always headquartered in LA, California, USA. Those questionable terms should not be incorporated into Bylaws before communities consensus.

14. Do you agree that the incorporation into ICANN’s Bylaws of the Affirmation of Commitments reviews would enhance ICANN's accountability? Do you agree with the list of requirements for this recommendation? If not, please detail how you would recommend to amend these requirements.

Put some appropriate principles of AOC into ICANN Bylaws would enhance ICANN's accountability. Actually, this is to solve the problem of effectively implementation of ICANN Board. Without strict regulations in Bylaws, even if the IRP determined that ICANN is wrong and there are specific penalties or solutions, It is still possible for ICANN board to delay the process of implementation or do nothing. So the “appropriate” principles should be the principles that could regulate ICANN board to some extent.

Additionally, ICANN should be accountable for all the stakeholders, not only for US government. According to the AOC contract relation between US government and ICANN, ICANN is only accountable for US government. Well, after abolishing AOC and partly incorporation some appropriate principles into Bylaws, ICANN will be more accountable for multi-stakeholders.

Moreover, some principles from AOC are not enough to make ICANN accountable for community. There should be more regulations in Bylaws. Currently, regulation to be binding upon ICANN Board is too vague, should be more clear and powerful. For example, if removal of a director is determined, then ICANN does not implementation, automatic removal after 10 days; if a policy made by ICANN Board is determined to be rejected by ICANN communities, the policy will be automatically stopped to implementation.

Do you have any general feedback or suggestion on the interim Work Stream 1 proposals?

Given that CCWG report has a significant reformation of ICANN system, it is necessary to have a deep thinking and a broad discussion. While, the Chinese translated draft report has not been provided yet, which brings some difficulties for some Chinese experts to have a deep understand and think about the report. This comment is from my individual point of views. So is it possible to prolong 7 days?

Appreciate all the people involving into this issue again. Hope with all our efforts, ICANN could have a much better accountability mechanism.

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