



Representing the ecosystem of Internet -Bharat Model

3rd June 2015

Dear CCWG-Accountability Team,

Please find attached CCAOI's comments to Cross Community Working Group on Enhancing ICANN Accountability (CCWG-Accountability) on Proposed Accountability Enhancements (Work Stream 1)

Thanking you and looking forward to favorable consideration of our comments by the CCWG Accountability Team in the interest of growth of internet in the world.

Thanking You,

Yours very truly,
for CCAOI

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CCAIOI's Comments on the Proposed Accountability Enhancements (Work Stream 1)

At the outset we CCAOI an association representing the ecosystem of Internet stakeholders in India comprising of Connectivity Providers such as Public Internet Access Providers (PIA's)/ Cybercafés/Telecentres; Content Providers; First time Internet users; wishes to thank Cross Community Working Group on Enhancing ICANN Accountability (CCWG-Accountability) on Proposed Accountability Enhancements (Work Stream 1) for providing the opportunity to comment on the Initial draft on Proposed Accountability Enhancements (Work Stream 1). Accountability and Transparency of ICANN to the global community, we believe is critical for the smooth running of the IANA Functions.

We are also of the opinion that Internet should remain stable and secure and all discussion should prioritize on the core guiding principles of security, stability and resilience of the internet.

In that light sharing CCAOI's preliminary comments:

- The CCWG Accountability draft seems quite complex and this might make it more difficult for stakeholders to participate in the process.
- For more engagement of the global community outside ICANN, the latter must promote greater engagement through more face to face meetings across the world and outreach activities.
- There seems to be a lack of in-depth discussion of jurisdiction of ICANN-Especially, US jurisdiction of ICANN.
- There should also be emphasis on accountability track including financial accountability of ICANN, and use of proceeds from new gTLD auctions.
- The focus on accountability should not be limited to ICANN, but also contributors such as IETF, RIRs, National Names and Number Registries and other players including respective staff and secretariats.