**Comments on Enhancing ICANN Accountability**

**by Internet Society of China**

Internet Society of China (ISC) welcomes ICANN’s further step to enhance accountability. ICANN is responsible for the assignment and coordination of DNS’s technical protocol parameters, which is crucial to ensure a stable, secure and unified global Internet. With the Internet gradually becoming the important information infrastructure for all nations, virtually every global stakeholders, including governments and Internet users, has attached increasingly more attention to the maintenance of a stable and reliable Internet. On behalf of Chinese Internet community, ISC has high expectations on ICANN’s accountability enhancement and would like to submit following comments:

1. **The implementation of ICANN functions should be transparent and accountable.** ICANN should implement its functions of management and coordination of Internet resources in a more transparent way. ICANN should carefully consider the opinions and advice provided by global multi-shareholders, whose diversity of status and development stage should be taken into consideration. Moreover, the function implementation should be accountable to the global public and multi-stakeholders to make ICANN’s day-to-day operation be more transparent and open. Thus, a feasible accountability mechanism must be set up to guarantee that rights should come in line with responsibilities and the implementation should be processed under proper supervision.
2. **Changing of ICANN’s legal status.** As a California nonprofit corporation, ICANN is subject to both the state laws of California, and the United States federal laws. It makes an impression to the public that ICANN is under the control of one single government, which is inconsistent with ICANN’s intention to be responsible for global multi-shareholders and will be impeditive of ICANN’s deepening globalization. In this regard, the existing legal status is not propitious for formulating an optimal multi-stakeholders working model. It is well suggested that ICANN seriously take the legal status issue into consideration, so that its multi-stakeholders working model could achieve a wide range of recognition and satisfaction in the world.
3. **Sticking to the principle of multilingualism.** ICANN should stick to the principle of multilingualism in its work and related affairs, so as to greatly facilitate even higher participation from non-English speaking communities. Spoken by the largest population in the world, the Chinese language should be accordingly addressed and reflected in various ICANN affairs. By offering Chinese simultaneous interpretation service at the annual meetings and timely providing policy documents and archives of Chinese version on its website, ICANN could effectively enhance the Chinese Internet community’s understanding of its activities, and then motivate their more participation and contribution.
4. **Following the principle of user-first.**

Internet users as a group is ICANN’s ultimate service target, so ICANN should follow the principle of user-first during its whole policy-making process. Specifically, inquiry and complaint channels should be established to receive users’ complaints and suggestions. More importantly, a responding mechanism should be set up to give feedback to each case and boost the improvement.