**GDD Draft Consensus Policy Implementation Framework – Input from Chuck**

Because I will unlikely be able to participate in the P&I WG call this week, I wanted to send my comments and questions in advance.

Section II, Working Principles

When referring to Policy team or GNSO Policy Team, does that mean the ICANN gTLD Policy team or does it mean the PDP policy team including both WG members and ICANN gTLD Policy team members? (See II.A & II.F)

II.B says “Staff will be held accountable by the GNSO Council (or its agent, such as an implementation review team) for ensuring that the implementation of policies is consistent with the policy recommendations and the reasoning underlying the policy recommendations.” How is it envisioned that the Council would do this? Will staff be required to follow Council direction? What would happen if they do not do that?

II.C says “All Consensus Policy recommendations must be evaluated using a consistent and rigorous framework before requirements are released and deployed. . . .” How will the rigorous framework be developed and by whom?

II.F says “A formal transition process (GNSO Policy Team to GDD, GDD implementation, and GDD to Compliance checklists) should be defined, documented, and approved for use by project sponsors as each new CPIF project is executed.” Who will do the approving?

II.I says “The CPIF and its documentation will be constantly peer reviewed to encapsulate additional best-practices or as a result of lessons learned with previous Consensus Policy projects.” Who are the peers?

Section III, Roles and Responsibilities

III.C says “The GDD staff are responsible for the entire implementation lifecycle, from creating an implementation plan, engaging the Implementation Review Team (if there is one), consulting with relevant ICANN staff and any outside parties that are required, and conducting outreach surrounding the implementation, including communicating with the public and relevant stakeholders regarding the progress of implementation.” Because registries and registrars will ultimately be the ones who have to implement applicable policies, it is essential that they be consulted in the process as early as possible so that operational issues can be identified and addressed in the most effective manner.

III.D says “. . . An IRT will typically consist of volunteers who were also involved in the development of the policy recommendations. . . .” I would suggest this be modified as follows: “An IRT will typically consist of but not be limited to volunteers who were also involved in the development of the policy recommendations.” Oftentimes it is much more useful to involve personnel with operational expertise who were not involved in the PDP.

III.I says: “Third-Party Service Providers: Contractors who will carry out, offer, and/or support a service at ICANN’s direction. These contractors may be expected to provide recommendations on the feasibility of certain approaches or assist with proposed solutions to issues raised during implementation.” The solicitation of any such contractors, RFP development and execution and selection of associated contracts should be done in consultation with the community to ensure that terms and conditions are implemented to ensure maximum success.

IV. Consensus Policy Implementation Framework

Regarding the timeline:

* Does ‘Staging’ end when the Board approves a policy?
* It probably would be a good idea to add a parenthetical after the Title that says “(time ranges are estimated).

The third bullet says “**Analyze:** is the process of breaking a complex topic or substance into smaller parts to gain a better understanding of it. In addition to a complete requirements document, the final consensus policy language are the formal outputs to this phase.” It seems to me that the ‘final consensus policy language’ should have come from the PDP WG. Is something different meant here?

I would suggest a minor edit in bullet four: “**Design:** is the creation of a solution or convention, if needed, for the construction of a system or service. A formal implementation plan is the primary output of this phase that includes requirements thoroughly vetted and tested.” Unless I am misunderstanding something, it doesn’t appear to me that a solution or system would always be needed.

V. CPIF Primary Milestone Checklist

GDD Staff is listed in the ‘Responsible’ column for most rows; in some cases GNSO Policy Staff is listed in addition to the GDD Staff; in one case GCO is listed along with the GDD Staff; and in one case Compliance is listed. In all cases it seems to me that the GNSO also has an oversight responsibility; should that be included as a footnote for this column?

PLAN, 4th row – As noted above, it doesn’t seem that ‘draft Consensus Policy language (if applicable)’ would ever need to be created. The PDP WG should have produced that.

ANALYZE, 2nd row – “If the implementation will require changes to existing services or the building of a new service, the implementation lead should consult service providers and tech experts as early as possible to ensure that these viewpoints are included from the outset of the implementation. This process could include issuing a RFI or RFP.” As stated earlier, any RFI’s or RFPs should be done in consultation with the applicable community members to ensure that terms and conditions are ensure maximum success.

DESIGN, 4th row – I suggest this edit to cover cases where there is not an IRT: “The GDD staff will consult with relevant staff (as needed) and the IRT or GNSO on final policy language and/or service.”

DESIGN, 7th row – I recommend this be edited as shown here: “In consultation with contracted parties, define a reasonable date in which contracted parties can implement changes to become compliant with the intent of the Consensus Policy.”