

Disclaimer: This summary is not a full and complete recitation of the relevant comments received. It is an attempt to capture in broad terms the nature and scope of the comments. This summary has been prepared in an effort to highlight key elements of these submissions in an abbreviated format, not to replace them. Every effort has been made to avoid mischaracterizations and to present fairly the views provided. Any failure to do so is unintentional. The comments may be viewed in their entirety at <http://forum.icann.org/lists/pdp-initial-report/>.

Summary and analysis of public comments for the Policy Development Process Work Team Initial Report

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Prepared by: Marika Konings, Policy Director

I. BACKGROUND

As part of GNSO Improvements, the Policy Development Process (PDP) Work Team (WT) was tasked to developing recommendations for a new GNSO policy development process. ICANN's policies have wide-ranging impact on how domain names are handled in the gTLD environment, so the method of developing the policies matters. The Work team has considered questions such as: who has the right to introduce a new issue into the PDP; how much background data should participants have before deciding policy; and, what are the possible outcomes of a PDP? The PDP-WT presented its Initial Report, containing amongst others forty-five (45) draft Recommendations and a flow chart that is intended to serve as the basis for the new Annex A of the ICANN by-laws, for Community input on 31 May 2010.

History

On 26 June 2008 the ICANN Board approved a set of recommendations designed to improve the effectiveness of the GNSO, including its policy activities, structure, operations, and communications. The following pertains to the PDP-WT's mission: Revising the PDP: The Policy Development Process (PDP) needs to be revised to make it more effective and responsive to ICANN's needs. It should be brought in-line with the time and effort actually required to develop policy and made consistent with ICANN's existing contracts (including, but not limited to, clarifying the appropriate scope of GNSO "consensus policy" development). While the procedure for developing "consensus policies" will need to continue to be established by the Bylaws as long as required by ICANN's contracts, the GNSO Council and Staff should propose new PDP rules for the Board's consideration and approval that contain more flexibility. The new rules should emphasize the importance of the preparation that must be done before launch of a working group or other activity, such as public discussion, fact-finding, and expert research in order to properly define the scope, objective, and schedule for a specific policy development goal and the development of metrics for measuring success.

The charter of the PDP-WT is to develop and document a revised GNSO Policy Development Process that achieves the goals established by the ICANN Board. The PDP-WT, with staff assistance, will need to determine what changes to the bylaws will be required. New processes will need to be documented properly to ensure that the bylaws (and any related

operational rules or procedures) are updated accurately. The revised PDP, after review and approval by the PPSC, GNSO Council, and ICANN Board, would replace the current PDP defined in Annex A of the ICANN bylaws.

II. GENERAL COMMENTS and CONTRIBUTIONS

At the closing of the public comment period, eight submissions had been made. One of the submissions was unrelated to the report (spam), while another submission asked a question about who had constituted the Work Team. The remaining six submissions provided input on the Initial Report and its recommendations and were made by the At Large Advisory Committee (ALAC), the International Trademark Association (INTA) Internet Committee, the Registrar Stakeholder Group (RrSG), the Registries Stakeholder Group (RySG), Naomasa Maruyama and Mary Wong (whose comments have also been endorsed by the Non-Commercial Stakeholder Group).

III. SUMMARY & ANALYSIS

The comments received have been summarized and categorized in the table below.

	Comment (Summary)	Who
Comment relating to		
Working Group Model	Prior to formally institutionalizing the WG model, the PDP WT should undertake or commission a review of whether the WG model is in fact optimal for addressing PDP issues	ALAC
Evidence / data	PDPs should be based on responsibly document evidence of an issue to be addressed. A reasonable data-driven threshold for introduction of a PDP is a necessary step.	RrSG
Planning and Request for an Issues Report - Issue Scoping (3a)	ICANN was established with parameters for good reasons – to keep the organization from overreaching and causing disruption, to clearly define its role, etc. If the GNSO is willing to continue accepting every issue that’s raised, whether in scope or not, ICANN will continue to experience the difficulties it does now. Setting reasonable boundaries about scope should not be difficult.	RrSG
Planning and Request for an Issues Report - Issue Scoping (3b)	No potential outcomes should be dictated as part of the PDP, though the SG agrees a requestor should identify potential outcomes if possible, without bias.	RrSG
Planning and Request for an Issues Report - Issue Scoping (3c)	The proposed suggestion (if there is not sufficient information available, an issue does not pass to the next stage) is a reasonable one. Proceeding blindly on policy development without sufficient information is irresponsible.	RrSG
Planning and Request for an Issues Report - Issue Scoping (3d)	The RrSG agrees that a variety of alternatives should be employed to address issues of concern to the community. A PDP may or may not be the appropriate method.	RrSG
PDP Flow Chart	The RySG notes that the PDP Flowchart shows the ‘Initiation of a PDP’ prior to the ‘Creation if a Drafting Team to develop the WG Charter’. In recent GNSO PDPs, it has appeared to be helpful to have a draft charter prepared	RySG

	<p>before initiating the PDP; that then makes it easier to decide whether a PDP should be initiated because the desired objectives and deliverables are defined.</p> <p>For ‘Adoption of the Charter’, the “Same voting thresholds apply as for the Initiation of the PDP”. The voting thresholds for initiating a PDP are as follows: To initiate a PDP within scope requires an affirmative vote of more than 33% of each House or more than 66% of one House. To initiate a PDP not within scope requires an affirmative vote of more than 75% of one House and a majority of the other House (“GNSO Supermajority”). It might be simpler to apply the default threshold, a simple majority of each house.</p>	
<p>Comment relating to Recommendation # (see http://gnso.icann.org/issues/pdp-initial-report-31may10-en.pdf)</p>		
<p>1 (Who -Request for Issues Report)</p>	<p>The PDP ought to address the manner in which unaffiliated groups and individuals can properly raise issues they would like to be considered. For instance, a funneling mechanism through which issues are vetted and/or passed to the GNSO or AC or relevant constituencies likely to have similar concerns, may be considered.</p>	<p>INTA</p>
<p>1 (Who -Request for Issues Report)</p>	<p>It is appropriate that the current mechanisms for initiating a request for an Issues Report be maintained and not expanded. The language of the current Recommendation may itself create further confusion. For example, is it the WT’s intention to equate the necessary action as between the GNSO Council and an AC? If so, that would have been clearer had the recommended language for (b) (where the Council raises an issue) read “raise an issue for policy development” (as it currently reads in relation to ACs) rather than simply “raise an issue”. Another option might simply be to re-title Section 1 of Annex A of the latest ICANN Bylaws, to read “Raising an Issue for Consideration Before Initiation of a PDP” (instead of just “Raising An Issue”, which is the current wording.) A separate section dealing with Board initiation of a PDP (bypassing an Issues Report and Council vote) should then be added. In similar vein, the words “Issue Raised by the Board” in Section 3(a) of Annex A should be amended to read “Initiation of PDP by the Board”.</p>	<p>Mary Wong</p>
<p>2 (Language – Request for Issues Report)</p>	<p>Although this was presumably not part of the WT’s charge, striking the “members present” language should be reviewed against other parts of the Bylaws (and any other applicable rules to ICANN constituent bodies, offices, committees, teams and groups, as the case may be) to see if similar problems present themselves in those situations and respects.</p> <p>A template for requesting an Issues Report would be useful, but ought not to be mandatory.</p>	<p>Mary Wong</p>

3 (How – Request for Issues Report)	Support for recommendation 3 and suggests that said Manual will also be open for public comment as it is developed.	INTA
3 (How – Request for Issues Report)	How are the contents of the PDP Manual/Guidebook going to be developed? Note also that Recommendation 5 appears to duplicate Recommendation 3.	RySG
4 (How – Request for Issues Report)	Some basic template detail should probably be mandatory, including for instance a statement as to why the issue is important to the relevant constituency.	INTA
4 (How – Request for Issues Report)	Issues for consideration should be raised through an electronic/online process that is linked to relevant sections of the PDP Manual.	INTA
4 (How – Request for Issues Report)	The RrSG believes this is a responsible step toward making future policies based on evidence and facts. A template that includes a clearly defined problem, well-documented supporting evidence, and a rationale for the use of increasingly very limited resources for development of policy, would be a useful tool.	RrSG
4 (How – Request for Issues Report)	Any manual or guidebook should encourage that ICANN participants are mindful and respectful of ICANN’s limited resources.	RrSG
4 (How – Request for Issues Report)	The RrSG looks forward to a continued discussion of what would constitute a reasonable threshold for initiating a PDP.	RrSG
3, 4 & 5 (How – Request for Issues Report & Issue Scoping)	A manual and/or guidelines would be helpful. It is not clear at this point how, and by whom, these manuals and guidelines will be developed. They ought to be a community process. Similarly, suggestions for identifying potential outcomes and ways to define the issue should be accomplished with community input. Recommendation #5 seems repetitive in light of previous recommendations. Are there specific issues or concerns that were not addressed by, say, Recommendation #3, that the WT intended be addressed here?	Mary Wong
6 (Creation of Issues Report)	In some cases it might be useful to do additional research, hold discussions or conduct outreach before an Issues Report is requested, so it might be useful to include this possibility in the manual/guidebook.	RySG
6 (Creation of Issues Report)	The Bylaws should not be complicated with too much detail, particularly (in this regard) the precise contents of an Issues Report. The WT recommendation that this be taken up as part of the preparation of the manual and guidelines is a good way of ensuring that sufficient guidance is given such that an Issues Report will serve as both a precise and informative document upon which to base a vote to initiate a PDP (or not.)	Mary Wong
7 (End result of PDP)	The RrSG welcomes this recommendation. Issues should be met with the solution that most appropriately resolves them.	RrSG
7 (End result of	The fact that potential outcomes of a PDP can be other	Mary Wong

PDP)	than the development of consensus policies ought to be further highlighted to the ICANN community, in line with the WT's recommendation.	
8 & 9 (Role of ICANN staff)	The General Counsel's role in opining whether a proposed PDP is "within scope" is both useful and necessary, thus the WT's recommendation in this respect should be followed. It would, additionally, be helpful if ICANN staff's function with respect to a particular Issues Report (e.g. whether technical expertise was provided or sought) could be included, where possible. The proposed manual/guidelines could further explore this question.	Mary Wong
10 (Timeline Issues Report)	Maximum time frames in the current PDP in the Bylaws have for the most part have had to be ignored because they were unrealistic for many issues. Timeframes are better put into the manual/guidebook instead of any Bylaws. The practice of asking Staff to provide estimates of time needed has worked fairly well in GNSO history and better accommodates the variability of issue complexity.	RySG
10 (Timeline Issues Report)	It may be possible to combine options (c) and (d); for example, prescribing the time frame (minimum to maximum) in the Bylaws, with the added proviso that if ICANN staff requests a modification of the time frame, then the estimate requirements in (d) be provided as soon as possible upon the request for an Issues Report.	Mary Wong
11 (Community Input)	INTA agrees with this position as it would allow relevant stakeholders and community members to have input on new issues that may not be reflected in the Issues Report.	INTA
11 (Community Input)	Considering the nature of ICANN as a multi-stakeholder, consensus-building organization, the recommendation for a mandatory public comment period, after the preparation of an Issues Report and prior to the Council vote in favor (or not) of a PDP, should be implemented.	Mary Wong
12 (Role of workshops)	What is meant by a workshop? Workshops traditionally have been held at ICANN international meetings but those are held only three times a year. Note that drafting teams have been used successfully in the GNSO in recent years for several purposes including drafting charters, developing recommendations for consideration before initiating a PDP, etc. Does the WT see a place for DTs in the PDP process and, if so, what would that be?	RySG
12 (Role of workshops) & 13 (Impact Analysis)	This should be discussed, and possible processes recommended, by those tasked with preparing the relevant manual/guidelines.	Mary Wong
13 (Impact Analysis)	INTA generally agrees with this recommendation with the caveat that more detailed guidance should be in the Manual on what constitutes 'appropriate or necessary' and how the GNSO Council should consider and use such analyses. The design of such studies so early in the process might be flawed or could bias the outcome or decision on whether to proceed with a PDP. Public comment period	INTA

	could provide adequate bases for parties to argue or support undue fiscal hardship economic impact.	
13 (Impact Analysis)	The RrSG agrees with this recommendation and believes it would be a prudent step in a PDP. It recommends that the PDP-WT add to this recommendation that impact analyses include, to the extent possible, an assessment of the impact to: the operations of registries, registrars and service providers; ICANN as an entity (including ICANN's revenue); end-users and customers of the DNS.	RrSG
13 (Impact Analysis)	The RySG believes that this is a very constructive recommendation.	RySG
14 (Prioritization)	The RrSG supports this recommendation and looks forward to a continued discussion of prioritization methods.	RrSG
14 (Prioritization) & 15 (Fast Track Process)	Given the possibility of unexpected or urgent issues that can arise from time to time, it will be difficult for the GNSO Council to accomplish a truly meaningful prioritization of the various tasks (including a PDP.) It would be unfortunate if a particularly important issue (e.g. as demonstrated by strong support for a PDP amongst numerous constituencies or committees) could not be pursued due to a lack of resources. Specific indicators (e.g. level of support; existence of third party economic impact studies) could be identified as aids to the GNSO Council when determining prioritization or initiation of PDPs. A "fast track" procedure would be a useful option. However, as identified by the WT, due consideration needs to be given to questions relating to gaming and ensuring broad (and diverse) participation.	Mary Wong
15 (Fast Track Process)	For issues that need urgent attention, the ALAC supports the development of a streamlined process which will require less volunteer and staff time, and less elapsed time.	ALAC
15 (Fast Track Process)	INTA agrees that, under certain circumstances, emergency procedures (requiring by-law amendment) may be necessary. INTA concurs with a sunset period that requires a subsequent (full) PDP procedure to confirm or adapt any temporary policy.	INTA
15 (Fast Track Process)	Recent experiences in the GNSO have demonstrated the need for such a procedure so the RySG supports this recommendation. But it should be recognized that some issues will be too complex to adequately cover in a fast-track process so it would be helpful if there were some guidelines that could be used to decide when to consider a fast track procedure.	RySG
16 (Flexibility)	INTA agrees with the proposed modified language set out in the report, but suggests that the clarifying language 'calendar' days be inserted in sub-clause 'b'.	INTA
16 & 17 (Flexibility)	Where a PDP is initiated by Board action, it is not clear what (if any) role public comment (which, as recommended, should be provided after the issuance of an Issues Report) would play in this regard. As such, the 8	Mary Wong

	<p>calendar days proposed by the WT may be either unnecessary (if the Council has no choice but to act on the Board’s instruction) or insufficient (if public comment is to be considered.)</p> <p>The recommendation that a Stakeholder Group or constituency may defer a vote on a PDP for no more than one meeting, and needs to detail its reasons for such a request, is necessary to ensure timely action on issues of importance, and minimize gaming or other similarly strategic actions.</p>	
18 (Appeals mechanism)	For the reasons stated by the WT in its report, requiring the Council to state its reasons in the absence of a formal appeal mechanism would help ensure transparency and accountability.	Mary Wong
19 & 20 (Chartering)	The WT’s rationale and recommendations regarding, in particular, the nomenclature for, participation in, and chartering processes for, a Working Group (as opposed to a “task force”) are timely and should be adopted.	Mary Wong
21 (AC/SO input)	It is encouraging that AC/SO cooperation is being contemplated on a more formal basis and will be institutionalized.	ALAC
21 (AC/SO input)	The WT’s recommendation that further consideration be given as to how to further involve other SOs and ACs in the PDP process are welcome and should be adopted.	Mary Wong
22 (timeframe for taking a decision)	This recommendation presumably applies to situations where the Council (as opposed to Councilors representing particular Stakeholder Groups or constituencies) believe a vote should be deferred, e.g. in order to obtain expert advice. To ensure timely action (one way or the other), however, it does not seem advisable to leave the question of how long such a deferral can last unanswered. Similarly, the question of whether a certain threshold of Council members is required before a deferral is confirmed is also important. To leave these questions to guidelines may not be the optimal solution, although it is certainly better than the current lack of guidelines and clarity. The WT may wish to explore the possibility of at least requiring that a deferral be made for no longer than the next Council meeting (unless the reason for the deferral reveals the need for a longer deferral period, in which case there should be a maximum time limit set, to be amended only upon further vote of the Council.)	Mary Wong
23 (Public Comment Period after Initiation)	INTA believes that the public comment period must be mandatory, noting that the public comment period is ample and the scope of comments is not restricted to the WG’s initial questions.	INTA
23 (Public Comment Period after Initiation)	The function – and nature – of public comments in relation to a Working Group (WG) request after its initiation can be different from public comments solicited and received in response to an Issues Report. As such, a public comment period should be mandatory, unless the WG specifically	Mary Wong

	deems it – and documents its reasons – unnecessary. Even so, this should not preclude the WG from initiating a public comment period at some later point in its processes.	
24 (Clarify ‘in scope’)	INTA agrees with the proposed language	INTA
24 (Clarify ‘in scope’)	The RrSG found this language to be confusing and would appreciate clarification from the WT. With regard to the general issue, it believes that ICANN’s role should be limited to that of a technical coordination body and avoid mission creep. Furthermore, the GNSO should not confuse policy development with policy implementation.	RrSG
24 (Clarify ‘in scope’)	The WT’s recommendation to clarify the “in scope” question, to distinguish this issue from that of “consensus policy”, is necessary and should be adopted.	Mary Wong
25 (Maximize effectiveness of WGs)	INTA agrees with the proposed recommendation	INTA
25 (Maximize effectiveness of WGs)	Development of a “cheat sheet” for WGs could facilitate implementation of this recommendation	RySG
26 (Communication with ICANN departments)	INTA agrees that such inquiry is worthy and that mechanisms for communication with ICANN departments should be clearly established.	INTA
26 (Communication with ICANN departments)	Clarification over appropriate and available means and channels of communication with various ICANN departments, will be necessary and should be developed.	Mary Wong
27 (Link with strategic plan & budget)	The initiation of a PDP might include consideration of how ICANN’s budget and planning can best embrace the PDP and/or its possible outcomes, the priority must be on ensuring that GNSO policy development can address the public’s needs, and ICANN should adequately budget and plan to meet those requirements.	INTA
27 (Link with strategic plan & budget)	The fact that policy issues do not arise in organized fashion according to a calendar (budgetary or otherwise) renders it practically impossible to implement a single process to determine how best to link a PDP with an overall strategic plan or central budget (e.g. the fact that emergency and fast track processes are being considered demonstrates this.) It is important, however, that financial constraints not be the major factor curtailing the initiation, timing or workings of a PDP. Much responsibility therefore devolves by default to the GNSO Council in its current role as manager of overall GNSO processes and work. It would be helpful, however, if through the Issues Report and constituency/stakeholder group input as well as SO and AC feedback prior to and during a PDP, as much detailed information (such as costs, timing and the need for further expert analysis) can be provided to the Council, to assist its deliberations as to whether to initiate a PDP, and (if	Mary Wong

	applicable) to the WG once a PDP is initiated and a charter approved. Suggestions as to what and how such information could consist of and be compiled could be made part of the manual/guidelines under consideration.	
28 / 29 (Public comment)	INTA agrees with the extension of timing for public comments, but believes the minimum should be 45 days to ensure that all members of the public have adequate time to comment. In addition, there may be circumstances under which more than 45 days is necessary, either because of the likely interest in the issue, or the calendaring of the request, and that provision should be made for extending the period for public comment under certain defined circumstances.	INTA
28 (Public comment)	Timeframes are better placed in the manual / guidebook than in the Bylaws because the former are much easier to change as needed. GNSO experience to date has shown that flexibility is often needed; in that regard, it might be better to suggest comments periods of 20 to 30 days, the latter being preferred if possible.	RySG
28, 29 & 30 (Public Comment)	Given ICANN's reliance on volunteer input and the importance of public comments, the proposed extension of a public comment period to 30 days is welcome and should be adopted. Although it might not be feasible to expect a WG to review and acknowledge all public comments received, nor would it be fair to add unnecessarily to ICANN staff workload, it is still important that the WG have easy access to all public comments submitted. The recommended language should therefore be amended such that, at a minimum, the ICANN staff manager must provide, a full list of all public comments received and an indication of which comments were deemed appropriate to be included in the summary and analysis provided to the WG, and which not.	Mary Wong
31 (Implementation / impact)	The first option seems like it could have value but it is not clear that it would be practical in some PDPs. It may depend on what is meant by implementation guidelines, so that may need some clarification. For example, the New gTLD PDP contained implementation guidelines but they were at a fairly high level; if the final report had to contain more detail, the PDP would have taken considerably longer than the 1.5 years it lasted. And we have seen that the implementation process has taken even longer than the PDP took. To the extent possible, it would be helpful to consult with WGs during the implementation process, but for PDPs that last a long time, WG membership tends to change a lot so that reality needs to be considered. Also, it is important to do that in a way that does not too easily provide an avenue for redoing recommendations in cases where some parties may not have been totally satisfied with the results unless	RySG

	<p>there is strong justification for doing so.</p> <p>Consultation with the GNSO should definitely happen during the implementation plan development. The GNSO Council should mainly be a channel through which that happens.</p> <p>In cases where an implementation team is formed, it would be useful to include members of the WG as possible.</p>	
31 (Implementation / impact)	To the extent that a WG can provide recommendations as to implementation, they would doubtless be useful. A WG ought in all cases to consider including these as part of its report, and should also consider whether to recommend the formation of an implementation team, which should consist of a broad base of participants and preferably include at least a few WG members. Recognizing the periodic difficulty of distinguishing between “policy” and “implementation”, it would be helpful (particularly in soliciting public comment) also if a WG could indicate which issues discussed or raised crossed the line, in its view, from one to the other.	Mary Wong
32 (Staff resources)	The RrSG concurs with this recommendation and encourages adoption of this provision as part of the PDP reform.	RrSG
32 (Staff resources)	The RySG strongly supports this recommendation.	RySG
33 (Constituency Statements)	The RySG thinks this is a good change. It might also be a good idea to note that in some cases constituency statements may be requested more than once.	RySG
33 (Constituency Statements)	The WT’s note that the lack of a statement from a constituency or Stakeholder Group may reflect that group’s belief as to the relative importance of that issue to it, or simply the group’s current workload, is important as it recognizes that there are numerous stakeholders in the ICANN community with varying interests in different issues. The reliance on volunteer participation and the recent increase in overall GNSO workload has also taken its toll on volunteer time and resources. Regardless of the amendment to Clause 7, therefore, the WT’s suggestion of additional follow-up with constituencies and Stakeholder Groups should be incorporated into the proposed manual and/or guidelines, and perhaps included as part of the charter for all WGs tasked with a PDP, where possible.	Mary Wong
34, 35, 36 (WG Output) & 37 (WG Recommendations)	The WT’s recommendations in these respects make sense and should be adopted.	Mary Wong
36 (Public Comment period Initial Report)	INTA agrees that such a public comment period should be mandatory. Optional additional comment periods may be useful in certain circumstances, such as when a final report differs substantially from the Initial Report.	INTA
38 (WG Recommendations)	The RrSG has no currently formed position on this issue, but agrees it is an issue that deserves attention and looks forward to contributing to further discussion.	RrSG

38 (WG Recommendations)	It is important to note that WGs do not necessarily have balanced representation. In contrast, the Council structure is designed to facilitate balanced representation of the stakeholder groups. Assuming that Councilors are consulting with their SGs and constituencies, Council decisions should reflect the consensus or lack thereof of the broader GNSO community and hopefully the broader ICANN Community as applicable.	RySG
38 (WG Recommendations)	No, the GNSO Council should not have the flexibility to ‘pick and choose’ recommendations. It is very important for PDP Final Reports to give an objective description of the level of each consensus for each opinion / recommendation.	Naomasa Maruyama
38 (WG Recommendations)	The Council should not be able to “pick and choose” recommendations, where these have not received full consensus within a WG, without at least fully documenting its reasons for doing so. In such a case, Council members should also indicate for the record whether it consulted with his/her constituency and Stakeholder Group as well as the outcome of such consultations. Where WG recommendations have not received full consensus, the WG report should indicate the actual level of support each recommendation received and (subject to a WG participant’s consent) a list of WG members in support of, or against, particular recommendations.	Mary Wong
39 (Board Report)	ALAC strongly supports this recommendation.	ALAC
39 (Board Report)	INTA’s view is that Staff should be allowed to provide its opinion to the Board, in an open, and non-confidential manner. Staff may be in a better position than most to decipher positive and negative suggestions and recommendations and should be heard in this capacity.	INTA
39 (Board Report)	The RySG suggests rewording this sentence along the lines of the following: “Reports on PDPs should be delivered from the GNSO Council to the Board and any summaries needed should be approved by the Council after consultation with the Working Group (if necessary)”. This would more clearly allow the Council to enlist GNSO policy staff support in preparing and delivering summaries and reports while still leaving approval of such to the Council in its representative capacity of GNSO Community members. In relation to the last sentence, as this initial report illustrates, reports need to be much more concise. Detailed background and supporting information can be referenced as appendices or attachments.	RySG
39 (Board Report)	All reports to the Board should be public. ICANN staff may be requested by the GNSO Council to assist in providing summary and analysis to the Board, but (as recommended by the WT) ultimate responsibility for the content of such summary and analysis should lie with the Council, who should work with the relevant WG to determine the need	Mary Wong

	for and extent of ICANN staff assistance.	
40 (Agreement of the Council)	Although not presumably within the scope of this WT, it should be noted that the actual procedures regarding absentee voting in the GNSO Council Operating Rules are currently being clarified. The WT should take note of the official interpretation (if any) of the pertinent part of the Rules, and review whether or not to revisit this issue in light of it.	Mary Wong
42 (Implementation)	INTA agrees with the recommendation to create an implementation review team as it will ensure that policy is implemented as agreed to in other stages of the process.	INTA
42 (Implementation)	The RrSG has no objection to this recommendation, but it should be considered in the context of the RrSG's other comments about an overtaxed staff and volunteer community.	RrSG
42 (Implementation)	The RySG supports the idea contained in the first sentence of the recommendation and suggests that the recommended composition of such review team be made in the WG final report. The review team then could serve as an ongoing resource for the GNSO Council and ICANN implementation staff.	RySG
42 (Implementation)	A WG Implementation Review Team would likely facilitate implementation efforts, and could act as the main conduit between the GNSO Council and ICANN staff charged with actual implementation of adopted policy recommendations. If a WG has included implementation recommendations as part of its report, the Implementation Review Team should ensure that these recommendations are either followed or amendments/departures from them justified. In addition, ICANN staff should consult regularly with the Team and update it frequently on the status of implementation efforts, as well as refer questions that might raise policy issues to it promptly, for review as to whether these should be referred to the Council.	Mary Wong
43 / 44 (Review of policy and WG)	Providing a policy now on these issues might create an avenue to appeal policy decisions rather than provide meaningful insights. Other aspects of the report already address avenues for measuring whether specific policy implementations are successful. Review can be positive and beneficial, but the multiple layers of review and assessment proposed may be overly extensive and might hinder the PDP process.	INTA
45 (Review of PDP process)	A periodic review of the effectiveness of the PDP Process would probably be beneficial. It may be that this review should be undertaken after a threshold number of PDPs have been completed.	INTA
Overarching Issues		
	Without firm recommendations or, in some cases, any roadmap suggesting the direction of the WT's discussions to date on a particular overarching issue, it is difficult for the public to comment. INTA hopes that the public will	INTA

	have another opportunity to comment upon any recommendations relating to the overarching issues before the Council considers them.	
Timing	INTA agrees that an overall assessment of timing needs to be conducted. It hopes that the public will have a further opportunity to comment on any overarching timing recommendations that may be propounded following this public comment period.	INTA
Translation	INTA believes that provisions in the new PDP relating to translations should, where possible, be consistent with the translation policy being developed by ICANN.	INTA
Translation	INTA does not support the idea of utilizing volunteers to translate key documents or public comments, however, it may support the role of a volunteer editorial group that would review professionally prepared translations to ensure that the translations use technically terms correctly. The qualifications for volunteers seeking to participate on a translation editorial review group should be outlined and how and by whom those individuals would be selected.	INTA
Translation	Further consideration should be given to how the proposed translation of key documents and public comments will impact the new timelines proposed for public comment periods. Fairness and inclusion dictate that non-English speakers should have the same length of time to comment on initial reports. Providing translations of public comments may improve inclusiveness, but may have a negative effect on the efficiency of the PDP.	INTA
Definitions	INTA hopes that the public will have a further opportunity to comment on any proposed definitional changes once the PDP-WT has an opportunity to complete its work on this overarching issue.	INTA
Voting Thresholds	INTA agrees that a higher voting threshold should not apply if ICANN staff recommends against initiating a PDP.	INTA
Voting Thresholds	The PDP-WT should make recommendations about how to handle competing WG charters and supports the proposal that in the case of competing charters, the Council should select the charter by majority vote.	INTA
Voting Thresholds	INTA supports the recommendation that a majority of both houses should be required to change administrative elements of an approved charter, but that a supermajority should be required to modify the charter questions themselves.	INTA
Transition	INTA hopes that the public will have a further opportunity to comment on any proposed recommendations relating the transition to the new PDP. Of particular note will be the recommendations relating to (1) the timeline for the adoption of the new PDP, and (2) the effect of that adoption on working groups already convened under the 'old' PDP.	INTA

IV. NEXT STEPS

The Policy Development Process Work Team is expected to consider all the relevant comments as part of their deliberations and efforts to complete its report.