



ICANN Public Comments: Phase II of Proposed Process Enhancements

CADNA appreciates the opportunity to provide its feedback on the proposed changes to the ICANN Public Comment process. As brand and trademark owners, CADNA members value the chance to comment on ICANN policies and are thoroughly invested in working with ICANN to improve the Public Comment process. We offer the following feedback on each of the four proposed enhancements.

Enhancement I: Stratification

CADNA agrees that categorizing Public Comment topics would be useful for stakeholders navigating the Public Comment forum. However, as a coalition of brand owners and trademark holders, we feel that the proposed stratifications are inaccessible for those community members not already intimately acquainted with ICANN policy and procedures. As the Focus Group has suggested, not only are the currently proposed categories ICANN-focused, but, given the overlapping nature of many of the issues with which ICANN deals, may make it difficult for the general public to locate a particular topic. If ICANN truly wishes to engage the “public” during its Public Comment periods, it should consider a greater number of intuitive and accessible categories that have the flexibility to list a Comment Period across multiple topics.

Enhancement II: Prioritization

While the prioritization of Public Comment periods is subjective to individual stakeholders, CADNA hopes that ICANN will not drop this issue altogether. Devising some system of Comment Period prioritization, even one as simple as the amount of time left in the Comment Period, would increase Comment Period accessibility for community members who are unfamiliar with ICANN’s policies. Adopting a star-based, user-rated system, as suggested in comments above, would be helpful to the public by directing them to those comment periods rated highly relevant by the majority of community members. As with the other enhancements suggested, a prioritization system comes down to the question of accessibility and ease-of-use. We at CADNA believe that such a system would ultimately increase both and help stakeholders air their views.

Enhancement III: Comment/Reply Cycles

CADNA sees great value in the proposed Comment/Reply Cycle enhancement. We applaud ICANN for embracing the opportunity both to increase dialogue and to increase the quality of that dialogue. While the 30 day minimum on the initial Comment Period seems adequate, we urge ICANN to lengthen the 15 day Reply Period to 30 days, especially for Comment Periods that have received a significant amount of feedback. An extended Reply Period would give participants more time to research and craft the kind of thoughtful discourse that ICANN no doubt seeks to encourage.

Enhancement IV: Technical Forum Improvements

CADNA supports the introduction of multi-threaded discussions for Public Comments. First, this platform would allow users to pinpoint specific threads relevant to them, thus perhaps serving as a de-facto prioritization system. Second, because multi-threaded discussion forums are now standard on most news websites, this enhancement is an inclusive and user-friendly option. By enabling thread update alerts, users could stay current as the discussion evolves and not miss the opportunity to participate. Other proposed improvements, such as the ability to directly upload attachments with comments and receive email alerts for newly issued Public Comment solicitations would also be important improvements over the current system. In short, CADNA believes that switching the ICANN Public Comment process to a multi-threaded discussion forum would increase participation, enrich the debate, and serve to foster an engaged community of contributors.