

GNSO gTLD Registries Stakeholder Group Statement

Issue: ICANN Public Comments – Phase II of Proposed Process Improvements

Date: 30 Sep 2011

Issue Document URL: <http://www.icann.org/en/public-comment/public-comments-process-enhancements-phase-ii-31aug11-en.pdf>

This statement on the issue noted above is submitted on behalf of the gTLD Registries Stakeholder Group (RySG). The statement that follows represents a consensus position of the RySG as further detailed at the end of the document. The RySG statement was arrived at through a combination of RySG email list discussion and RySG meetings (including teleconference meetings).

The RySG appreciates the opportunity to comment on the proposed process improvements for ICANN public comments and compliments all those who have contributed to this effort to date. Our comments are organized by the four major enhancement recommendations and are provided in response to questions asked to stimulate feedback about the processes, which are shown in *italic* font.

Enhancement 1: Stratification

1) Do you agree that the use of categories (or tags) would assist you in making a determination to participate in a particular Public Comment solicitation? Yes

2) If yes, would Staff's proposed categories serve that purpose?

Regarding the proposed categories in Table 1:

- 1) The categories are a good start. However, some mechanism should exist for items that are not anticipated. Adding an "other" category or a mechanism for revising the list would be useful.
- 2) As noted elsewhere in the document, "Policy Development" and "Policy Implementation" can sometimes be very broad categories with lots of variations and in specific instances can extend over many years. Sub-categorization might be helpful in such cases.
- 3) The difference between "Organizational Review & Improvements" and "Structural Design/Improvement" is not clear on the surface. Assuming the intended distinction, "Infrastructure" instead of "Structural" would address the issue.

3) Would you propose additional or replacement categories such as those offered by the Focus Group?

Here are some possible categories and sub-categories:

| ICANN Category* | Key Impacted Groups* | Topic Area(s) | Sponsoring Group(s)* |
|---------------------------------|---|--|-------------------------------|
| Proposed 9 categories + ‘Other’ | SOs, ACs, SGs, Governments, Communities, etc. | IP, Privacy, Freedom of Expression, etc. | GNSO Council, At-Large, Board |

* More than one category/subcategory is possible.

Enhancement 2: Prioritization

1) *Do you concur with the assessment that a separate field for “priority” is not advisable?*

Yes because priorities are highly subjective and will vary greatly across different organizations.

2) *If not, can you think of any other ways that “priority” could be usefully introduced?*

By adding subcategories as suggested regarding Enhancement 1, individuals and organizations would be able to better prioritize request for comments on their own.

Enhancement 3: Comment/Reply Cycles

1) *Do you see value in having a separate Reply Cycle during which contributors can comment on previous submissions?*

Definitely but enforcement of the restrictions for replying is critical. One way to facilitate this would be to provide a required reply template that has fields to be completed such as the identification of the comment being replied to and specific points where there is disagreement or correction. The form should allow a single reply to address more than one comment.

2) *Do the periods of 30 days and 15 days seem reasonable for this engagement or would you recommend different timeframes?*

Yes as long as there is flexibility to adjust those periods to accommodate significant holidays, ICANN meetings, etc.

Enhancement 4: Technical Forum Improvements

1) *Do you support the goals and objectives of a robust threaded discussion forum for ICANN Public Comments? (Please provide rationale).*

Yes, we support the goals of a threaded discussion because it allows near real time dialog on issues, but we believe that the forum needs to be managed to make it a comfortable place for open and constructive discussion to happen. It might be helpful if participants identify whether they are participating as an individual or representing an organization. In cases where they are representing an organization, they should identify the organization.

2) Do you concur with the idea of a one-time pre-registration for posting privileges if it can be minimally invasive and easy to perform?

Yes.

RySG Level of Support

1. Level of Support of Active Members: Supermajority

- 1.1. # of Members in Favor: 10
- 1.2. # of Members Opposed: 0
- 1.3. # of Members that Abstained: 0
- 1.4. # of Members that did not vote: 4

2. Minority Position(s): N/A

General RySG Information

- Total # of eligible RySG Members¹: 15
- Total # of RySG Members: 14
- Total # of Active RySG Members²: 14
- Minimum requirement for supermajority of Active Members: 10
- Minimum requirement for majority of Active Members: 8
- # of Members that participated in this process: 13
- Names of Members that participated in this process: 13
 - 1. Afilias (.info & .mobi)
 - 2. DotAsia Organisation (.asia)
 - 3. DotCooperation (.coop)
 - 4. Employ Media (.jobs)
 - 5. Fundació puntCAT (.cat)
 - 6. ICM, Inc. (.xxx)
 - 7. Museum Domain Management Association – MuseDoma (.museum)

¹ All top-level domain sponsors or registry operators that have agreements with ICANN to provide Registry Services in support of one or more gTLDs are eligible for membership upon the “effective date” set forth in the operator’s or sponsor’s agreement (RySG Charter, Article II, RySG Membership, Sec. A). The RySG Charter can be found at http://www.gtldregistries.org/sites/gtldregistries.org/files/Charter_for_RySG_6_July_2011_FINAL.pdf.

² Per the RySG Charter, Article II, RySG Membership, Sec.D: Members shall be classified as “Active” or “Inactive”. An active member must meet eligibility requirements, must be current on dues, and must be a regular participant in RySG activities. A member shall be classified as Active unless it is classified as Inactive pursuant to the provisions of this paragraph. Members become Inactive by failing to participate in three consecutively scheduled RySG meetings or voting processes or both. An Inactive member shall continue to have membership rights and duties except being counted as present or absent in the determination of a quorum. An Inactive member immediately resumes Active status at any time by participating in a RySG meeting or by voting.

8. NeuStar (.biz)
9. Public Interest Registry - PIR (.org)
10. RegistryPro (.pro)
11. Societe Internationale de Telecommunication Aeronautiques – SITA (.aero)
12. Telnic (.tel)
13. Tralliance Registry Management Company (TRMC) (.travel)
14. VeriSign (.com, .name, & .net)

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