



Association Française pour le Nommage Internet en Coopération
chargée de la gestion des noms de domaine en *.fr* et *.re*

AFNIC comment on ICANN draft strategic plan 2010-2013

AFNIC is a not-for-profit, multistakeholder organization founded in 1997, managing the French country-code top level domains *.fr*, *.re*, *.tf*, *.wf*, *.pm* and *.yt*. AFNIC is a member of ccNSO and a founding member of CENTR, the European regional organization of ccTLDs gathering 57 ccTLD managers.

AFNIC appreciates the opportunity to comment at an early stage in the strategic planning process. However we note that the document submitted for comment remains vague on a number of points. We have not been able to locate information related to several of the projects mentioned. We hope that by the time the next version of the strategic plan is published, these concerns will be solved.

Lack of focus

The draft strategic plan lays out several categories of project: community work, strategic projects and staff work. This is a very useful and valid distinction.

A quick look at page 3 shows that there are:

- 13 community work items;
- 13 strategic projects;
- and 14 staff work items.

Of course these are only the topics addressed in this document, and it is possible that other activities will be undertaken by ICANN.

Our point, therefore, is that **the draft strategic plan lacks an essential quality: focus**. This lack of focus would:

- be detrimental to ICANN's ability to deliver projects on time,
- increase difficulties to get efficient stakeholder feedback and
- overload the SOs and ACs councils and officers.

As a result, one can also predict :

- higher barrier to entry for newcomers wishing to participate,
- difficulties for the Board to monitor all strategic and community projects,
- and at the end of the day increased risks of capture of projects by the staff, and lack of accountability.

We strongly recommend that the number of community work and strategic projects be brought down to 5 each, at a maximum. For other items ICANN examine should examine whether another party could lead the project to the benefit of the global Internet community, or whether the project should be delayed.

Missing a key strategic objective: reducing costs

We have noted with interest on page 2 of the document the following sentence: "*In five years, we hope that ICANN's work is virtually invisible...*"

We support this goal, consistent with the coordination mission of ICANN. The discrepancy between this target and the current situation is however striking.

On the financial side for instance, ICANN fees have been an issue for both the new gTLD process and the IDN ccTLD fast-track. There have been consistent comments outlining that these fees were inappropriately high for small projects.

Concerns have also been raised for several years now about the ever-ending growth of ICANN budget and its consistency with ICANN's non-profit statute.

We strongly recommend that a **transversal strategic goal be added to the strategic plan aimed at reducing ICANN costs**. ICANN should, year after year, identify at least 5 areas of its activities where it intends to cut costs significantly. The target should be to lower the different ICANN fees by a certain percentage over a 3-year period.

Introducing selection among key projects, as mentioned above, would usefully contribute to this important goal.,

Further information needed

For the record, since we mentioned earlier the lack of information provided on some projects, we regroup below some of the questions raised by the document. We hope that by next version additional explanations can be provided:

- What are valid registrations? (in section competition& trust, strategic objective)
- What is intended through "DNS CERT"?
- What does "registrant right charter" refer to?
- Why would training be restricted to ccTLDs? How about candidates to the new gTLDs process?

We hope these comments will contribute usefully to your strategic planning process, and look forward to the publications of the next versions of ICANN's strategic plan.