

### Comments on ICANN's draft 2010-2013 Strategic Plan

The Canadian Internet Registration Authority (CIRA) is the not-for-profit corporation responsible for operating the .ca country code top level domain. CIRA is a member of ICANN's country code Name Supporting Organisation (ccNSO) and a member of CENTR, an association of Internet Country Code Top Level Domain Registries. CIRA is pleased to have the opportunity to provide comments on ICANN's draft 2010-2013 Strategic Plan.

#### **General Comments**

The 2010-2013 draft plan was posted and opened for comment primarily over a holiday season, with limited communication and visibility, and did not follow the expected timeline. This has led to the consultation process not being conducive to soliciting community feedback and comment.

As well, the plan lacks focus and includes too many tasks. There should be fewer initiatives, and they should better lay out strategic direction. Presently, some tasks overlap, some are operational and others are overly broad. For example, "Training for ccTLDs", while a laudable objective, should perhaps find its place in ICANN's Operational Plan, or at least not be limited to only one focus area. Other objectives are so high-level that they read more like a tag line than a strategic objective (i.e. "One unified, global internet"). Initiatives or projects should be provided in order to give such high-level objectives meaning.

## **DNS Stability and Security**

Although the Strategic Plan indicates that Preserving DNS Stability and Security is one of ICANN's four areas of focus, ICANN's Expense Area Group reporting indicates a total of only 10% of ICANN's 2010 budget will go to "Supporting SSAC activities and coordinating with Internet security efforts" and "Root Server Operations and Support for RSSAC". This raises the question of whether this is an appropriate allocation of funds, or whether it is inconsistent with ICANN's priorities.

#### **IDNs**

The introduction of IDN top level domains has the potential to open up a large new market for the domain name registration services industry. This will certainly offer many new opportunities and benefits for Internet users around the world by using their domain in their own native language.

However, many communities have limited awareness of the technical aspects and logistics of IDNs, nor do they have the manpower or the finances to raise awareness in the local community on the benefits of IDNs and how they could increase Internet penetration and awareness in their respective communities.

While "implement IDNs" is a worthy goal, it requires other strategies to succeed. We submit that the Strategic Plan should contain objectives such as outreach, training and consultation, which will support not only IDN implementation but many other projects as well (e.g. new gTLDs, DNNSEC, IPV6).

# Multi-stakeholder model

The multi-stakeholder nature of ICANN is the basis for its credibility and authority, and it is important that this is recognised in the Strategic Plan. However, a more concrete definition of what the model consists of and expansion on key initiatives flowing from this model are required to demonstrate how ICANN will achieve this objective.

## **Excel in IANA and other core operations**

ICANN should clarify what is meant by "other" core operations, as well as what is meant by "to excel" and "flawless IANA operations." Processes, targets, and performance metrics should be identified, as well as other objectives or tasks that flow from this area of focus.

#### **Accountability**

We welcome ICANN's commitment to accountability and transparency as a strategic objective. This commitment aligns with numerous other documents (such as the Affirmation of Commitments, ICANN by-laws, etc.) referring to ICANN's accountability. While an extensive framework exists at ICANN in an effort to remain accountable, in reality there is little actual responsibility for ICANN to be accountable to its stakeholders. Implementing reviewable mechanisms that define key performance measures and indicators, that hold ICANN accountable, and that measure accountability effectiveness, would assist the ccTLD and broader Internet communities in assessing ICANN's performance. The draft Strategic Plan should identify current accountability performance measures along with objectives for improving accountability.

CIRA looks forward to reviewing future versions of ICANN's Strategic Plan.