Nominet Comments on the Draft Strategic Plan

Nominet is the registry for the .uk country code top-level domain. With over eight million registered domains, we are the third largest country-code top-level domain. Nominet is a long-standing and active participant in ICANN and in ICANN's country code Names Supporting Organisation.

We have taken a leading role in the discussion and development of ICANN strategy over many years and are therefore pleased to have the opportunity to respond to ICANN's consultation on the latest iteration of ICANN's strategic plan.

General Points

- We support the four areas of focus identified in the draft strategic plan.

- The change of format to a brief and high level strategic plan presentation at this stage is helpful. However, there is a risk that different interpretations of what the strategic objectives actually mean could result. In the next stage of the process, more information will need to be provided on the agreed strategic objectives, with the aim of enhanced community and stakeholder support and understanding.

- We are concerned that the current strategic plan process does not seem to include an iteration stage where the potential resource implications of the draft strategic plan are widely considered. There are three areas where this may be appropriate. Firstly, when cost implications are considered, it might be necessary to revise the plans to suit the budgeted income. Secondly, the general ICANN community may not have the capacity to make sufficient progress on all of the priorities simultaneously. Thirdly, ICANN may not have sufficient current staffing resource in order to be able to deliver the plan.

Comments on Areas of Focus

1. Preserve DNS Stability and security

We believe this to be the most important of the strategic areas. It is of the utmost importance to all Internet users and to the achievement of ICANN's vision. The narrative text for this area refers to the need to work in partnership with other organisations in order to preserve DNS stability and security. It is therefore suggested that 'enhance partnerships in this area' should be an additional strategic priority for this heading.

We note that approximately 10 % of ICANN's current budget spend is allocated to this area and suggest that better alignment of strategic priorities with budget allocations may be required.

2. Promote competition, trust, choice and innovation

We support this as a key strategic area. In our view, this will be the most challenging area in terms of developing and implementing policy that reflects the public interest and acts for the benefit of global Internet users. In terms of the strategic projects in this area, it is suggested that 'improve policy process' should specifically include outreach activities to

ensure maximum levels of stakeholder awareness and engagement in policy. The metrics for this strategic area should include 'year 0' measurements of stakeholder awareness and policy engagement, in order to permit year on year comparisons.

3. Excel in IANA and other core operations

We support IANA as a key strategic area. There is a close alignment between the importance of high quality IANA operations and the priorities of country-code managers. It is not clear which other ICANN operations are included in the definition of 'core operations' and we suggest that this should be covered in the more detailed stage suggested earlier. The metrics for this strategic area should include those relating to customer satisfaction, quality benchmarks and processing times.

4. Contribute to shaping a healthy Internet eco-system

We support this as a key strategic area and view it as the second highest priority for ICANN. In terms of the strategic objective of 'all stakeholders have a voice at the table', we believe that work is still needed to increase participation. Language is not the only barrier to stakeholder engagement: improvements should make it easier to understand issues and to contribute to the consultation processes. In addition, the balance between the community's role in developing top-line principles and the executive's responsibility for the detail of policy implementation needs to be made clearer.

The strategic objective of 'Improved accountability and transparency' remains of key importance, particularly given its status in the recent Affirmation of Commitments. It will be important for the more detailed strategic plans to include actions and initiatives to improve accountability and transparency in the short to medium term, rather than awaiting the recommendations of the review resulting from the Affirmation of Commitments. Should the mandate of the President's Strategy Committee be renewed, we stand ready to assist their continued deliberations on this objective.

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