

Comments on ICANN's Draft 2011-2014 Draft Strategic Plan January 25, 2011

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 Organization (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 2011-2014 Draft Strategic Plan.

CIRA is pleased to see that ICANN's Draft 2011-2014 Strategic Plan includes, in the column entitled "A Healthy Internet Ecosystem," a commitment to "World-class accountability and transparency." CIRA agrees that accountability and transparency should be overarching priorities. They are the linchpin of the multi-stakeholder model, at the root of ICANN and the Internet itself.

An extensive accountability framework exists at ICANN, with the Affirmation of Commitments and ICANN by-laws containing accountability obligations. ICANN by-laws also contain transparency and access to information obligations, and a third-party review process, which contribute to accountable governance.

Last year, the Accountability and Transparency Review Team (ATRT) was tasked with reviewing ICANN's execution of its commitments to accountability and transparency under the Affirmation of Commitments (AoC). The ATRT provided recommendations on improving accountability and transparency.

CIRA supports the ATRT recommendations, in particular those that suggest implementing performance metrics and benchmarks in order to track compliance with ATRT proposals. In fact, developing performance measures and indicators for all strategic objectives and priorities contained in the Strategic Plan will improve overall accountability. As well, accountability and transparency with respect to decision-making are also key. ICANN should identify the reasons for decisions, point to arguments that opposed their decisions and explain why they were not accepted.

Recent moves by ICANN have been detrimental to its accountability, by compromising the ability of all stakeholders to adequately and provide valuable feedback on the strategic planning process and the plan itself. During communications with senior ICANN staff in mid-November 2010, the Strategic and Operational Planning Working Group (SOP WG) was informed that the Strategic Plan would be approved at the ICANN meeting in Cartagena, that is to say December 10th, 2010. However, ICANN missed all of its own deadlines for submitting a copy of the Strategic Plan in advance to the SOP WG to allow for enough time for meaningful comment. Finally, on November 27th, ICANN posted the draft Strategic Plan for public comment, with a comment period open until January 10, 2011 (then further extended to January 25th).

The SOP WG, and other stakeholders, are attempting in earnest to provide ICANN the feedback it requires and requests to improve its draft Strategic Plan. It has been frustrating and counterproductive having no commitment to timelines and process. The very feedback from the community that ICANN professes to desire is being compromised by the ICANN process itself, or lack thereof. In addition, the process contradicts previous comments made by ICANN's Chair and CEO on the desirability of community participation in the strategic planning process.

ICANN should alleviate this situation by firstly, establishing an organized process that it can commit to, and secondly, increasing the number of days provided for public comment to 60 days. This may require changing internal planning processes, but is crucial to ensuring sufficient time for community members to provide appropriate feedback.

In conclusion, CIRA urges ICANN to follow through on its commitment to world-class accountability and transparency. ICANN should adopt the ATRT recommendations and solidify processes which can ensure proper public participation, which will assist with the accomplishment of this objective.