

## **Submission of the ccNSO SOP WG on Draft ICANN Strategic Plan 2012-2015**

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### **Please note:**

*The views of the Working Group do not represent the ccNSO, its Council, or ccTLD managers collectively or individually. However, the SOP WG is mandated to make submissions on its own behalf.*

## Executive Summary

- While it is necessary for ICANN to recognize the importance of the volunteer community's contribution to its success, the focus in the Strategic Plan should be on ICANN's clear vision for its ownwork, and on defining objectives, milestones and benchmarks . This level of planning will then allow the development of more detailed, specific budget allocations.
- Acting in the global public interest should be one of the pillars and driving forces for ICANN its work and the ICANN community.
- In the focus area "A healthy Internet governance eco-system", "*world-class corporate governance*" should be added to the strategic objective of "world-class accountability and transparency".
- The introduction of new gTLDs together with the increase of contracted parties requires attention and scaling, together with enhanced monitoring of the industry practices related to domain names.
- The increase in the number of Strategic Objectives to 24 seems very ambitious and may raise the risk of losing focus.
- The description of the strategic metrics needs more attention. However, a balance between measuring and performing is recommended.

### 1. Introduction and Background

The ccNSO Strategic and Operational Planning Working Group (SOP WG) welcomes the opportunity to provide comments on the Draft 2012-2015 Strategic Plan and appreciates this year's predictability of the planning process.

This submission is structured as follows:

- General comments on the overall draft Strategic Plan (Section 2)

Comments on each of the four strategic focus area's

- DNS stability and security (Section 3)
- Competition, consumer trust and consumer choice (Section 4)
- Core operations including IANA (Section 5)
- A healthy Internet governance eco-system (Section 6)

The SOP WG was created to coordinate and organise participation of ccTLD managers in ICANN's Strategic and Operational planning processes. The scope of activity of the Working Group is to do whatever it deems relevant and necessary to facilitate and improve participation of ccTLD managers in the aforementioned processes. The views of the Working Group do not represent the ccNSO, its

Council, or ccTLD managers collectively or individually. However, the SOP WG is mandated to make submissions on its own behalf.

## **2. General Comments**

While it is important for ICANN to recognize the importance of the volunteer community's contribution to its success, the focus in the Strategic Plan on the work that others (e.g. "the community") are conducting or must undertake, seems out of place. The Strategic Plan should focus on ICANN's clear vision for its own work, defining objectives, milestones and benchmarks, for assessing success in related activities. This level of strategic planning will allow the development of more detailed, specific budget allocations.

The number of strategic objectives has increased from 18 in the 2011-2014 Strategic Plan to 24 in the current draft plan. This seems very ambitious and focus may be lost over time.

We suggest the setting of annual (sub-) goals for each of the strategic objectives on a year to year basis and then ongoing monitoring and reporting to community on progress.

Further, it is advised to check the proposed objectives vis-à-vis previous ones and to audit those that were successfully achieved.

In the view of the SOP WG, the description of the strategic metrics needs more attention; in particular they should be better quantified. However, the WG members believe that finding the right balance is critical to avoid too much measuring instead of moving forward.

It is recommended to entirely remove the Influence versus Control section. These two elements should be part of an internal strategy rather than a public Strategy Plan, in particular as it should be ICANN's mission to serve the (ccTLD) community instead of "influencing" it.

Moreover, it does not make much sense to state "participate in a wide range of constructive (...) debates". Any debate is constructive per se even if it does not achieve the objectives. We feel that the use of the adjective "constructive" is inflated in the Strategic Plan 2012-2015.

## **3. DNS stability and security**

In order to maintain their support and engagement, stakeholders must have a clear understanding of the role ICANN sees for itself in this focus area and must be reassured that ICANN has undertaken appropriate preparations to translate the very broad and general undertakings in Clause 9.2 of the Affirmation of Commitments into specific work programs that have been appropriately prioritised, based upon clear evidence and analysis. ICANN must undertake appropriate strategic planning, including gap and impact analyses, and the areas where ICANN's remit appropriately positions it to facilitate these improvements.

With these principles in mind, the SOP WG has the following feedback on the DNS Security and Stability focus area of the Strategic Plan.

In general, there is not sufficient overview of ICANN's plans to manage its Security and Stability obligations, nor of benchmarks for achieving those plans.

There are 23 line items under the heading DNS Stability and Security. However, there are only 9 "Strategic Metrics" which in fact do not provide sufficient measurability for the 23 line items.

There are numerous references in the Strategic Plan to activities to be taken on by the community, not ICANN. For example the Community needs to develop the Whois database to accommodate internationalized registration data and related privacy policies. These are statements on the work and resources currently being undertaken or planned by existing groups. ICANN's role is not clearly outlined.

Under the heading DNS Stability and Security, Staff Work is to include "Increase business outreach." There is a lack of clarity of what this means and how this will assist ICANN achieve its four Strategic Objectives of DNS Security and Stability.

It is also stated, that "ICANN will coordinate the development of an Internet number resource certification as a means to increase Internet Protocol (IP) security." The SOP WG is uncertain what role ICANN can or will play in the development of Internet number resource certification.

#### **4. Competition, consumer trust and consumer choice**

Compared with the previous Strategic Plan the description of the strategic objectives in this focus area has improved substantially, both in terms of metrics and goals. However, in the view of the SOP WG some of the proposed metrics are still unclear, and should be improved. A more detailed analysis of the metrics and suggestions for improvement are included in Annex A, Competition, consumer trust and consumer choice metrics.

#### **5. Core operations including IANA**

In general, the SOP WG agrees with the strategic objectives and associated projects and activities listed for this focus area, and notes that they are deemed to be highly critical to ensure that ICANN is properly equipped for the phase it is entering.

The following parts of the objective to improve enterprise systems / processes / controls are particularly important:

- Increased operational efficiencies
- Relative reduction in operating costs,

- Improved data integrity and availability, faster generation and publication of reports, better accessibility to financial information, and
- Improved customer service

The WG recommends that ICANN determine performance and service levels for its core operations (including IANA), and designs and implement measuring methods and systems for those. Customer satisfaction should be measured quantitatively and qualitatively frequently and processes should be benchmarked, both in terms of technical and financial performance, with, for instance, TLD registries.

The SOP WG considers improvement of ICANN staff training, retention and engagement highly critical. However the concrete goals are unclear, in particular how progress will be measured and evaluated.

ICANNs objective to perform the IANA functions responsibilities on a long-term basis is generally supported. The WG notes that the proposed draft statement of work requires additional assurances with regard to the quality of work (e.g. security standard certification, external audits). It is not clear from the draft 2012-2015 plan how ICANN intends to meet these higher requirement levels.

In the draft 2012-2015 plan, IANA service level agreements are mentioned. It is not clear to the WG whether this refers to the service levels required by the US Government/NTIA or whether ICANN intends to enter into service level agreements with its clients for IANA services.

The WG notes that two of strategic objectives in this focus area are not measurably formulated. These two are:

- Meeting evolution to more effectively address.
- Internationalization to strengthen ICANN's international operations and presences

## **6 A healthy Internet governance eco-system**

It is the view of the SOP WG that the objective “Act in global public interest” should not just be an objective for this particular focus area. It should be one of the pillars and driving forces in itself for ICANN and all of its work .

Therefore, we suggest restructuring and redefining the objectives in this focus area in order to improve the clarity and quality of the content. We suggest the following strategic objectives:

- Enhance and expand global participation
- Ensure world-class accountability and transparency
- Increase engagement and commitment in the international arena

In addition we suggest including *world-class corporate governance* as a strategic objective.

A more detailed description is included in Annex B of this submission. In line with comments made earlier in respect of ICANN's core operations, specific targets for measuring success in this focus area should be developed and reported against regularly.

## **Annex A, Competition, consumer trust and consumer choice metrics.**

Metric: Launch of the new gTLD program and **timely** processing of applications. In the view of the SOP WG, the term 'timely' may differ considerably from one area to another. We therefore suggest including a more specific goal, such as processing 95% of applications within published time frame..

Metric: **Number** of IDN ccTLDs delegated annually.

It is unclear if ICANN refers to a specific number, and if so, how much resource is going to be needed to reach success at the end of the period. If there is a specific target, it is suggested to include that number or a range in case of uncertainty.

Metric: New gTLDs and IDN Fast Track. implementation of measures of success that **align** with ICANN core values and original program objectives.

It is unclear to the WG how is this alignment is going to be measured. Were the original objectives measurable? We also suggest to list who is going to define that alignment.

Metric: **Describe** the priorities of the regional education program and **report** progress.

This goal seems to be too specific. In the view of the SOP WG this is rather a strategic action than a measure for a strategic objective. The WG does not understand which Strategic Objective is supported through this action We suggest to specify what exactly what may drive success in the main Objective, because it seems to be an isolated action with no more specificities to consider.

Metric: Build, publish and execute a contractual compliance regime for addressing the new expanded TLD space.

This seems to be important for many of the proposed objectives, but it is not clear which ones are addressed through this measure. To maintain focus for ICANN's department in charge of the implementation of the compliance regime we suggest including all the Strategic Objectives that need to be addressed during the implementation of this goal.

Metric: **Launch** and timely progress of the WHOIS program enhancements, especially to address internationalized data.

It appears that the launch of the WHOIS program is key, however there is no mention of effectiveness.

Metric: **Document and publish** IDN guidelines in 2012. If publication of the guidelines is the goal then no additional qualifications are needed. Otherwise it should include some criteria to measure effectiveness.

Metric: **Address** the domain names that are not compliant with IDNA 2008 protocol. "Address" may have different meanings for different areas. So details are needed because that may represent a difference of several million USD in spending on compliance. We suggest including more details regarding this goal.





## **Annex B: Detailed proposals to restructure focus on a healthy internet governance eco-system.**

### *Enhance and expand global participation*

ICANN intends to continue being an exemplary model for multi-stakeholder global governance.

ICANN initiated the Global Partnerships program in 2006 to create a network of international liaisons to improve engagement at the local level. Moreover, the ICANN Board has created the Board Global Relationship Committee to support ICANN global capacity-building efforts. Therefore, ICANN will:

- Continue to evolve the Global Partnership program by completing and refining the liaison network
- Eventually, appoint local IDN points of contact in specific regions to maximize the efficiency of the IDN program
- Design outreach actions to search for more input from the edges of the multi-stakeholder model
- Implement a multilingual and IT (remote participation technologies) strategy to boost participation in the multi-stakeholder model
- Continue the fellowship program in partnership with other organisations to support the DNS needs in emerging countries

### *Ensure world-class accountability and transparency*

The community and ICANN have completed the ATRT review resulting in 27 recommendations. ICANN will continue to work with the community to implement them and ICANN will:

- Ensure that Board of Director set-up and policies reflect the multi-stakeholder model approach
- Regularly review the supporting organisations and advisory committees to improve the organisation's structure and responsibility to the stakeholders
- Streamline its organizational structure and staff work
- Introduce measurable goals for its programmes, projects and actions
- Continue to publish regular reports and progress reports on its activities
- Maintain and improve robust mechanisms for public input, accountability and transparency in order to have decision making processes accountable to all the stakeholders
- Build upon recent efforts to formalize the cross-stakeholder model (i.e. across the GA, supporting organisations and other committees) in order to streamline the policy development process

### *Increase engagement and commitment in the international arena*

In the past decade ICANN has regularly engaged with other international organisations that are looking after some aspects of Internet governance. As one

of the key players in the Internet eco-system as well as one of the bodies that also act as a repository of knowledge and best practices, ICANN will:

- Continue to participate in a wide range of Internet governance related debates, including IGF global and regional meetings
- Strengthen its liaison and engagement with other international organisations, including the EU, OECD, ITU, by engaging in formal and offline discussions on matters of common interest
- Ensure continuous and regular participation in the regional organisations to outreach the various communities and collect their inputs
- Seek involvement in relevant international studies, analysis, or evaluations where the ICANN knowledge can be of paramount importance, so that efforts are not duplicated and the effectiveness of any outcome is optimized.