Comments for the Internet Infrastructure Coalition (i2Coalition)
September 13, 2014

The Internet Infrastructure Coalition (i2Coalition) appreciates the opportunity to comment on Proposed Bylaws Changes Regarding Consideration of GAC Advice. See public comment notice at https://www.icann.org/public-comments/bylaws-amend-gac-advice-2014-08-15-en, and the ICANN paper on this topic at https://www.icann.org/en/system/files/files/proposed-revisions-gac-advice-15aug14-en.pdf.

The i2Coalition supports those who build the nuts and bolts of the Internet, and we treat it like the noble profession that it is. Our diverse membership represents both large and small Internet infrastructure providers such as web hosting companies, software services providers, data centers, registrars and registries. We believe the continued growth of the Internet is vital for growing an environment of innovation and seek to engage in ways to foster success of the Internet and Internet infrastructure industry. We seek to influence decision makers to weigh decisions on whether they are good or bad for the Internet economy and its foundational industries. In short, we seek to foster growth within the Internet infrastructure industry by driving others to harness the Internet's full potential.

The i2Coalition has several key goals with ICANN, but chief among them is continuing to build a voice for underrepresented parts of the Internet ecosystem and ensuring that accountability and transparency are paramount. i2Coalition brings unique representation to ICANN as it is made up of companies representing the whole broad ecosystem of Internet infrastructure companies. Today we see a paucity of ICANN engagement from – in particular – web hosts, data centers and cloud infrastructure providers, and we seek to collectively change that.

It is important to note that this segment of the Internet infrastructure ecosystem is predominantly made up of small to medium sized businesses worldwide. Many businesses already well represented at ICANN are large-scale enterprises with different needs than those of the smaller to medium sized businesses that make up the bulk of i2Coalition membership. By bringing these groups to the table, we can help drive forward important efforts, including assisting and promoting the important work of the Security and Stability Advisory Council (SSAC), which seeks to ensure the security and stability of the DNS root.

It is from this context that we seek to oppose the Proposed Bylaws Changes Regarding Consideration of GAC Advice. With the NTIA IANA Functions' Stewardship Transition in process and work by both the BGRI Working Group and Global Stakeholder Engagement Group taking us through a period of great transition, we do not believe it is the time to enact changes that may be seen as governments taking on a disproportionate role within the private-sector led

multistakeholder ecosystem. We call upon the Board and the ICANN community to either reject or postpone this proposal during this vital period of transition.

We acknowledge and comprehend the GAC's desire to have their advice considered strongly by the Board. Other Advisory Councils (ACs) within ICANN share that desire when submitting their own advice to the Board. On May 6, 2014, ICANN initiated a <u>consultation with the community</u> around ICANN accountability. This consultation is an opportunity to consider how to address this concern for all equal groups. i2Coalition believes that it is inappropriate to deal with the GAC's concerns outside the context of the broader discussion of ICANN accountability. We believe that accepting this proposal as written is likely to make it more difficult for other ACs to be provided their opportunity to achieve their own goals and still maintain balance within the system that is required to achieve true accountability for ICANN. The GAC's concerns can be addressed in the process already begun as ICANN's accountability consultation moves forward, but it needs to be addressed along with the concerns of other equal parties. Though i2Coalition firmly believes that governments deserve a seat at the table and that policy issues affecting the Internet benefit from governmental input, we are firm in our belief that governmental entities should be treated as an equal among all stakeholders in multistakeholder processes. Addressing this issue out of turn could serve to disrupt this fundamental principle irreparably.

How ICANN is run, governed, the role it plays in the Internet ecosystem, and the method it uses to manage the DNS root are all issues that are of great importance to i2Coalition members. Decisions made at ICANN in the next several years have the potential to fundamentally alter the structure of the Internet. We understand that some groups are concerned about the influence that U.S. and other western governments may have on multi-stakeholder organizations like ICANN, and we committed to helping address those issues in ways that preserve and protect the multi-stakeholder model. It is our firm belief that participation in these processes is not only a civic duty, but also an economic necessity.

We respectfully request that the Board not make the proposed Bylaws change.