



ICC informal feedback on ICANN's Draft Framework of Principles for Cross Community Working Groups

Members of the International Chamber of Commerce (ICC) Commission on the Digital Economy and its special project Business Action to Support the Information Society (BASIS) are pleased to provide these informal comments as the Internet Corporation for Assigned Names and Numbers (ICANN) continues to evolve its structures and obtain community feedback on a proposed draft framework of uniform principles to guide the initiation and operations of future cross community working groups (CCWGs).

ICC continues to stress the need for broader business representation, expertise and involvement in all ICANN structures and processes and views this as essential to the continued growth and evolution of ICANN. These informal comments seek to share general business perspectives on CCWGs which are often important avenues for business participation and engagement in ICANN policy and development processes.

ICC's Commission on the Digital Economy is composed of companies and business associations from all sectors including, business users, service providers, hardware and software developers, communications operators, mobile operators, and Internet Service Providers (ISPs). With national committees and groups in 120 countries, ICC's members span the globe and are involved in all of ICANN's business related constituencies. ICC supports the continued development of ICANN, and considers its role managing the domain name system (DNS) of the Internet to be critical to business and users. ICC applauds the outreach efforts ICANN has made to ICC and business worldwide.

Given the composition of ICC's membership from all sectors and geographic regions, ICC is uniquely placed to provide a truly global business perspective at this important juncture in the development of CCWGs. ICC BASIS participated in the IANA Stewardship Transition Coordination Group (ICG) as a representative of business and was actively involved in the CCWG-Accountability process through the diverse and direct engagement of members and some national affiliate representatives.

These informal comments on ICANN's proposed draft framework of uniform principles to guide the initiation and operations of future cross community working groups (CCWGs) aim to offer business perspectives on a number of aspects of CCWGs which business believes are important to reflect on when considering steps for their evolution.

Opportunities to contribute

ICC, as well as other business organizations and companies, have internal review or approval processes that they have to follow to contribute to policy development processes. ICC has a comprehensive consensus building process that requires a layered review and comment process to develop new ICC positions on any substantive issue. Thus, it is important for ICANN and CCWG requests for input to take into account that organizations, like ICC, have to comply with their own review processes to ensure that members can reach consensus on substantive issues before they can provide input to ICANN. ICC believes that it is important that sufficient opportunity is provided for input and comment on draft CCWG deliverables and public comment periods allow enough time for participants to develop a position of the wider group they may be representing.



Diversity and representation

CCWGs provide an important opportunity for many stakeholders to engage and contribute to ICANN's policy work and development and it is often valuable to hear diverse view points and benefit from broad perspectives. To help ensure diversity and broad perspectives in CCWGs consideration should be given to the diversity within stakeholder groups. For example the businesses community consists of many diverse sectors which are affected by the range of issues ICANN follows.

In addition, as noted on page 6 of the Draft Uniform Framework, CCWG participants may need to where appropriate, solicit and communicate the views and concerns of individuals in the organization that appoints them. Therefore sensitivity should be given to the fact participants of a CCWG maybe representing diverse views of an organization or stakeholder group.

Forming a CCWG

Business encourages steps to ensure conscientious considerations are vetted before initiating a CCWG to avoid overlap and duplicative efforts. It is important that there is broad community interest to engage on a topic and assurance that a broad range of stakeholders will be represented in the process.

CCWGs should avoid tackling too many issues at once, as this leads to reduced constructive input from members of the community.

Consensus building and transparency

On page 10 of the Draft Uniform Framework polling is noted as a tool Chairs of CCWGs may use in rare cases. Care should be taken when using polling mechanisms to draw consensus and assess the level of support for a particular proposal, as polls can often be problematic and draw ambiguous results.

It is important that CCWGs continue to act transparently when reviewing comments received. Upon the close of a public comment period a CCWG is expected to review and analyze all public comments received and produce and publish a summary and analysis document. As noted above, participants of a CCWG maybe representing diverse views of an organization or stakeholder group and may need to revert back to relevant groups when developing comments and positions during consensus building processes.



About: ICC and ICC BASIS

The International Chamber of Commerce (ICC) is the world's largest and most representative business organization, with some 6 million members in over 120 countries. During the initial two phases of the World Summit on the Information Society, ICC served as the business focal point. ICC BASIS is the successor initiative made up of multinational enterprises, SMEs and associations from around the world and across sectors that work actively and collectively to foster business engagement in the post-WSIS follow up activities. The positions and perspectives ICC BASIS puts forward are developed through the ICC Commission on the Digital Economy, where they benefit from the robust consultative process ICC undertakes with the breadth of its membership.

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