

## SUBJECT: CENTR Board input with regard to the ICANN consultation on Enhancing ICANN Accountability 27<sup>th</sup> of May 2014

CENTR is the European country code TLD organisation. Its objectives include promoting and participating in the development of high standards and best practices among ccTLD Registries. CENTR has 52 full members who manage the Internet country code for their country. Together, CENTR members are responsible for over 80% of all registered country code domain names worldwide.

We welcome the opportunity to contribute to the public dialogue on enhancing ICANN's accountability. ICANN's accountability should be guided by accountability principles that are accepted and agreed upon by the ICANN community as a whole. For the sake of enhancing a well-structured accountability framework, we recommend the legal, administrative, financial, representative and social aspects of accountability be taken into account. Therefore, it might be worth considering whether to launch a broader consultation to reach a consensus on what ICANN should be accountable for and subsequently to determine how ICANN's accountability could be enhanced.

We would like to comment on the following, specific characteristic of the process:

- Any effort to strengthen ICANN's accountability should not make the current processes more complex than the existing ones. We are confident that changes to the present mechanisms should aim at simplifying the process rather than introducing additional layers without jeopardising the highest possible accountability standards.
- We are pleased with the creation of an ICANN Accountability Working Group to coordinate the community dialogue and acknowledge the importance of external expertise in bringing in new ideas. The identification of external experts should be a joint and balanced effort on behalf of ICANN's staff and the Community.
- Knowledge and expertise gaps impact the effectiveness of the current accountability process. These gaps that occur during the input phase and during the evaluation and mapping of the results against the initial input should be carefully assessed and filled by ICANN in a timely manner.

At present, the resources required to monitor the processes, review the outcomes and hold ICANN accountable for the community are too large to be managed by one individual, especially considering the voluntary aspect of this work. Consequently, the aforementioned tasks are divided between different groups and individuals. This contributes to fragmentation and knowledge gaps.

The ICANN staff for the Supporting Organisations and Advisory Committees has done a great job so far, but the independence of their work might be questionable. Therefore, each constituency should consider putting in place a dedicated resource who could take on the advisory and

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coordinating role for its community. This resource should be funded by the constituency and not by ICANN.

• We regret to underline that the timeline for providing input regarding this crucial aspect of ICANN is extremely short. As a matter of fact, despite the minimum requirements being met, it would be much more desirable that this kind of process benefit from a longer comment period in the ultimate interest of the communities that voluntarily participate in ICANN's work on a daily basis and, above all, of the accountability process itself. The goal of obtaining a fast outcome of the process might imply a severe risk of missing, if not excluding, relevant perspectives that could represent an added value for ICANN and its community.