Comments of China Internet Network Information Center (CNNIC) on "Enhancing ICANN Accountability"

29 May 2014

On behalf of China Internet Network Information Center (CNNIC), hereby we would like to take this opportunity to provide our comments on enhancing ICANN accountability. Our comments focus mainly on process, concerning the establishment of ICANN Accountability Working Group and the means by which to enhance ICANN accountability.

Our specific comments are as follows:

1. Overall Comments

We welcome all the efforts made by ICANN to enhance its accountability. It plays an essential role in gaining the consumer trust and smooth transition of IANA stewardship.

We have noticed that, ICANN has programmed to address the accountability process in a separate process, independent from the IANA function transition without any interaction. ICANN's commitment to its accountability will directly influence the reliability of IANA transition. Therefore, we recommend these two issues shall be discussed and interactively promote within the same framework.

The core of ICANN's accountability lies on consumer trust. ICANN shall continue to

maintain remarkable performance of its core function and live up to its commitment to the ICANN community. From this perspective, ccTLDs and its affected parties both are major users of IANA function and important cooperation partners. ICANN needs to pay fully attention to them, meanwhile ensure the quantity of representatives and their true participation.

2. Specific Comments

(1) Comments on *"What additional comments would you like to share that could be of use to the ICANN Accountability Working Group?"*

ICANN proposed that ICANN Accountability Working Group is comprised of community members, namely SO and AC, subject-matter experts and a liaison appointed by ICANN Board. However, its electing and working mechanism remains obscure to the public. ICANN shall take equality and representation of all regions into full account, ensuring the participation of the developing countries, and clarify the principles of its constitution, personnel assignment and member election. All the issues above shall be included in the comments to ensure an open and transparent process.

(2) Comments on *"What are the means by which the Community is assured that ICANN is meeting its commitments?"*

◆ **Regarding to Policy Making**

ICANN's policy has an essential impact on the global Internet community. The policy making process is, however, prone to be exclusive by "closed clubs", which will cause decision capture. ICANN shall strengthen the transparency of decision making and

implement the bottom-up model.

◆ **Regarding to Member Election**

Member election of ICANN shall be pursuant to open and transparent principles with clear criterion and rules. Further improvement shall be made in terms of the qualifications and regions of members, and the election process shall be publicized.

When electing working group members, ICANN shall give adequate consideration to the regional balance, ensure the real participation of diverse regions by electing, especially regarding the developing countries. Asia deserves close attention from ICANN since it has the world most netizens and registries. Besides, the ccTLD community, as the major users of ICANN and IANA, shall exert more efforts and impact on ICANN's decision making and daily operation.

(3) Comments on *"Are there other mechanisms that would better ensure that ICANN lives up to its commitments?"*

◆ **Regarding to External Supervision**

In the absence of its historical contractual relationship to the U.S., we recommend that ICANN need to form a more sufficient and effective external supervision mechanism to develop a credible accountability on policy making and operation, for purpose of ensuring that ICANN shall pursue its stated objectives and principles, and fulfill its responsibility to the global Internet community. With regard to the unpredictable problems in the future, we recommend the different channels shall be utilized to provide reflections and supervisions of the global Internet community so as to ensure a timely adjustment.

◆ **Regarding to the local engagement structure**

ICANN developed a branch structure including hub offices and engagements centers like Beijing and Montevideo in the diverse regions, by which ICANN devotes to expanding the global influence in all time zones and promote its globalization process. We consider that this is one of the most significant approaches to promote the interactions with local participants and establish a presence in all regions of the globe. We strongly recommend ICANN exert efforts to further substantiate the full function and working capacity of this architecture, by which ICANN shall initiate more effective dialogue with the global community.

[About CNNIC]

China Internet Network Information Center (abbreviated as CNNIC) is an administration and service organization set up on June 3, 1997 upon the approval of the competent authority and undertakes the responsibilities as the national Internet network information center. In light of the policies of "providing efficient and application oriented services through secure & stable Internet infrastructure for public interests", CNNIC, as leading actor in Chinese information society, is responsible for operation, administration and services of fundamental Internet resources, undertakes R&D and security work of fundamental Internet resources, conducts research on Internet development and internet governance, and promotes the cooperation and technological exchange of global Internet. A global platform for internet governance research called internet governance research center (IGR) has also been founded by CNNIC.

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