Dear ICANN,

We welcome the opportunity to make a public comment to the proposed revisions to the ICANN Expected Standards of Behaviors. We are pleased to see that many of the changes recommended by the community have been taken up in the new proposed standard.

However, we wish to note that the proposed changes alone will not achieve the objective of actually creating a safe and secure environment, which is needed to allow for the full participation of people from all backgrounds. We encourage ICANN to continue to take the process further than the current proposed changes to the ICANN Expected Standards of Behaviors.

The current standard revision seems to be largely based on the anti-harassment policy of the IETF. The IETF experience has shown that a simple statement of intention is not enough, and that an accompanying policy is needed to map out the implementation of these standards. The IETF therefore drafted (and revised) RFC7704 [0], which defines problematic and harassing behavior in detail, with references, and subsequently goes on to define a clear process for remediation in case such behavior might occur, as well as describing the allocated resources. We strongly recommend ICANN to embark upon a similar model as the IETF while ensuring that the process continues to be consultative and participatory. This is critical for establishing meaningful inclusion and a diverse environment at ICANN.

We are not suggesting the IETF example as the only solution, or that it should be replicated word-by-word, but without an accompanying document specifying the different issues and processes in detail, the language of the ICANN Expected Standards of Behaviors will be toothless. For example, if the terms "appropriate behavior" or "professional standards" are not properly defined, this standard will be vague, open to broad interpretation, and consequently have little effect. There are many strong examples of other anti-harassment policies and standards that ICANN can draw from, as provided by the community in the lead up to the changes to the standard (like the work done in the IETF and by the Ada Initiative).

Although it is important to ensure that individual acts of harassment are appropriately dealt with and remedied, it is equally important to foster an environment that is welcoming, and one which does not portray any individual or group of people in a degrading or discriminatory manner. During the initial contributions and comments made by the community, we focused on creating standards that promote an enabling environment. We were guided by existing standards that have been proven to be successful, as noted in the GNSO letter to the ICANN board. Unfortunately, this issue is not yet addressed in the revised ICANN standard.

In conclusion, a guiding document is vital to the effectiveness of the revisions proposed in the Expected Standards of Behavior. The document must include clear definitions of the different concepts mentioned, detailing the process for remediation. It must focus on the actual behavior of individuals as well as the general culture of inclusion we should have at ICANN.

We acknowledge that the revised language is a great step forward, and hope that the important issues presented in this letter will be considered moving forward. We look forward to your comments.

[0]https://tools.ietf.org/html/rfc7704