**CENTR Comment on**

**Organisational Review of ICANN’s**

**Country Code Names Supporting Organisation (ccNSO)**

CENTR welcomes the opportunity to comment[[1]](#footnote-1) on the ITEMS report on the organisational review of the ccNSO. Our comments on the recommendations follow below.

**Recommendation 1:**  *The ccNSO should consider the adoption of alternative, consensus-based, lighter and faster policydevelopment mechanisms: a) A comments mechanism would allow the ccNSO to provide a prompt response to a request from ICANN’s Board or another Supporting Organisation. b) A position paper mechanism would allow the ccNSO to elaborate common Statements on relevant ccTLD issues in a way that reflects the general position of the ccTLD community. The fast tracked comment mechanism as with the position paper mechanism would be non-binding to ccNSO members.*

**CENTR Comment**: CENTR is honoured to be set as a good practice benchmark by the reviewers.

We remind that any such procedure should aim at nothing more than reflecting the general position(s) within the membership. The result of a comment/position paper process should explicitly mention that it is not binding for all members. In addition we’d like to point out that these processes can only be efficiently applied when there is already a general agree-ment amongst the membership about the issues at stake. However, CENTR is not a policy developing organisation and therefore applies different and more lightweight mechanisms.

**Recommendation 2:***Consider the translation into the main UN languages of key documents concerning and produced by the ccNSO (Bylaws, the Rules and Guidelines document, major Policy papers) of a brief summary of ccNSO position paper.*

**CENTR Comment:** There is no doubt that translating key documents could be of great help for some non-English language communities, but translations tend to come at a high cost, so any budget for translations should be wisely spent and measured against other initiatives that could be equally or more effective to enhance participation.

Participating in the discussions needs English. Therefore translating the results might discourage people with limited English skills to participate. A much more effective way to increase participation might therefore be less translation but an increase of communicating the need to encourage people - even with limited English skills - to participate.

Lack of participation should not only be attributed to the lack of translated documents. Moreover, this might create bigger differences than today, as only large countries will have the advantage of translated documents. Today members with English as their mother tongue have an advantage compared with the rest of the members. If translation into UN languages is performed, the smaller countries will have even worse conditions than today.

If the ccNSO does proceed with this initiative we strongly recommend that after an initial test, user and download statistics are analysed carefully before the continuation of the translation project is considered.

**Recommendation 3:***Due to the significant cost of translating documents on a regular basis we suggest that the task of translating all documents related to the ccNSO’s activity could be carried by the ccNSO membership itself. This could be facilitated by the setting up of a multilingual wiki (as used by Wikipedia). In this way, the translation of documents would become the responsibility of the linguistic communities themselves, and there need be no limit to the number of languages that documents could be translated into. If such a mechanism were adopted we would also suggest the appointing by the Council of a “linguistic community manager” for each language who would have responsibility to check the accuracy of the translations*

**CENTR Comment:** While it seems a good idea to encourage ccNSO members to provide translations on a voluntary basis we are doubtful that even a minority of ccTLDs would have the resources to support such an initiative. A ‘language wiki’, as suggested by the reviewers might be useful and achievable if restricted to an absolute basic repository that could help the novice to understand what the ccNSO is about.

**Recommendation 4:***The ccNSO staff should regularly engage in outreach activities to enlarge membership / better communication with non-members. ICANN should increase resources in order to propose attractive and value-added services for the ccTLD community. These value added services would require a dedicated “online community manager” whose responsibilities it would be to attract new members, especially from underrepresented regions.*

**CENTR Comment:** It seems inappropriate to increase the costs related to the ccNSO’s operation by introducing “*attractive and value-added services for the ccTLD community”*.

The ccNSO is a policy development body and should concentrate on this important and resource intensive task.

Services provided cannot overstep the limited scope and mission of ICANN and the ccNSO. New services can only be introduced after discussion and with the approval of the ccNSO members.

**Recommendation 5:***The ccNSO should engage with the GAC and ALAC to determine a joint initiative to boost the membership levels of all the SOs and ACs within ICANN.*

**CENTR Comment:** At the moment the ccNSO has more than 100 members, only a minority of whom can be considered as active members. The ccNSO has made major advances to increase membership and important work has been done by the Participation working group. However, more could be done.

One could wonder whether a top-down ICANN led bid for new members is the right approach, especially as at least some of the target audience are hostile to ICANN (cf Distrust / hostility towards the ccNSO, page 49)

Boosting membership and participation across all organizations in ICANN is a good idea.

**Recommendation 6:***When ccNSO develops a policy which could impact the activity of registrars and registrants, ccNSO should be able to collect their position.*

**CENTR Comment:** While we would have no problems with the Registrar Stakeholder Group engagement, registrars and registrants impacted by ccTLD policies are subject to local policy development processes.

Therefore:

* it would be alarming if the ccNSO were to spend much time on registrar or registrant issues, which are best dealt with at national level.
* There could be an additional issue of giving ICANN accredited registrars an inside track over other national registrars.

We doubt that this recommendation really recognise the limited role of the ccNSO?

More generally, there are arguments in favour of the silo approach – and the work on IDN fast track and on the security, stability and resilience issue shows how effective this can be.  Working the other direction (ccNSO being invited to other discussions) would also be useful, bearing in mind the drive from law enforcement (who has been working with the GNSO) for their ideas to be applied more generally than the gTLDs.

**Recommendation 7:***Beyond the ongoing improvement of the website, we recommend the implementation of a collaborative networking tool allowing ccNSO to create subgroups based on thematic, regional, linguistic grounds. Such a tool could include wiki, agenda, project management functions and allow members to update their own contact details within the register of all ccNSO participants. Articulation of this collaborative tool with existing mailing lists has to be studied. Such a tool would be helpful for the animation of the ccNSO community as well for attracting new members. Animation of such a tool requires “community management” capabilities.*

**Recommendation 8:***ICANN should provide ccNSO with appropriate “management community” capabilities in order to make the best usage of the collaborative tool.*

**CENTR Comment:** We believe that the current ccNSO secretariat is doing an excellent job in reaching out to the community. The current website and YouTube channel are good instruments, and we’re looking forward to the announced improvements to the website. In the light of the budget discussions it does not seem appropriate to consider additional staff.

(We note that the ccTLDcommunity@cctld-managers.org mailing list, which is administered by the ccNSO secretariat, and aims to be an informal communication channel for ccTLD managers – not only ccNSO members, is not mentioned in the review.)

**Recommendation 9:** *Introduce a limit to the number of terms that can be served by ccNSO Council members (item tabled for discussion at ccNSO meeting in Brussels).*

**CENTR Comment:** The report considers it as problematic (page 78) that the number of candidates for the last Council elections was equal to the number of available seats.

Unfortunately, the report doesn’t investigate possible reasons for this low number of candidates (e.g. lack of interest, too time consuming, relative high number of Council members, ...) but concludes that introducing a limit to the number of terms that can be served by a ccNSO Council member will improve participation. We suggest additional analysis to be undertaken on that issue, before taking any step.

Attracting qualified and motivated officers for a non-remunerated role as councillor is already quite challenging at the moment. It would be ill-advised to change the current rules and as a result risk losing an irreplaceable amount of expertise and knowledge. However, the issue might be addressed by encouraging acting Council members to look for candidates from their region to take over their role when their term expires. If they act as ‘mentor’, more ccNSO members might be interested in taking on an active role.

**Recommendation 10:**  *ccNSO should consider clarifying of the respective roles of the Council and the Chair in the ccNSO Rules and guidelines.*

**Recommendation 11:** *The ICANN Expenditure Analysis by Stakeholder Interest Area represents a major progress in term of understanding the allocation of ICANN budget towards ccTLD and ccNSO operations. In the interests of the members of the ccNSO and the broader ccTLD community, we recommend the institution of a permanent Finance Liaison (a designated member of the Council) whose responsibility will be to act as a gobetween with ICANN’s Finance Department and to ensure complete transparency regarding this issue and any other budgetary matters linked to the activities of the ccNSO and ccTLDs. The next release of ICANN Expenditure Analysis by Stakeholder Interest Area could be an opportunity to reduce the “perception gap”.*

**CENTR Comment:**

The Financial section of the report is out of scope of the terms of the review and therefore it was inappropriate for it to be included in the report. The interviews & questionnaires did not cover this area and as the report itself states, ICANN also provided ITEMS with clarification that this area was not included in the review.

However, it is at least unusual that an organisational review is asked not to look at the financial aspects. It remains unexplained why ICANN considered the area should not be covered. Moreover the recurrent discussions with the ICANN Board clearly demonstrate that these are challenging issues.

**Recommendation 12:**  The ccNSO should develop and publish annually a policy road map for the next two three years to act as a strategy document for current and upcoming policy work and as a general marketing tool for information purposes within and outside the ICANN community.

**CENTR Comment:** The development of a policy road map for the short and mid terms would enable ccNSO members to better plan their participation and their inputs. The ccNSO has progressed well in the recent years, but it is time that its work gets more structured.

On the other hand the recommendations seem to lose sight of the rather different nature of the work of the ccNSO.  We should not forget the very limited role of the ccNSO (as identified in annex C of the Bylaws) and that most policy is set locally.  We also point at the GAC Principles for ccTLDs which recognise this subsidiarity[[2]](#footnote-2). While this is reflected in the body of the report, it is also ignored in parts (for example page 38 which compares (unfavourably!) that the relative PDP score was ccNSO 1, GNSO 5).  In addition, the full PDP is compared unfavourably with the IDN ccTLD fast track:  without wanting to ignore the significant achievement of the fast-track process, to some extent these were dependent on being able to put off the difficult discussions to the full PDP.

**Additional comments:**

**Supposed Knowledge about the ccNSO purpose**

The reviewers assume that ccNSO members have a good knowledge of the scope of the ccNSO and the purpose for which it was set up.

They come to this conclusion based on self assessments by the ccNSO members (see for example page 82[[3]](#footnote-3)). It would be interesting to verify if the purpose the respondents have in mind strokes with the ideas that were put on paper when the ccNSO was set up.

People may claim to be happy with the ccNSO fulfilling its purpose based on a perception and expectations that differ from the organisations purpose.

**Review process:**

The entire review process could have been done in a much more efficient way, for example by giving the external reviewers ad-hoc contact with the registry representatives that participate regularly in the ccNSO and therefore, are more aware of the various matters and issues.

**The following members requested an opt-out from this comment :**

The .SH Registry, part of Internet Computer Bureau Ltd, a founding member of CENTR, does not support submission of the document entitled CENTR Comment on Organisational Review of ICANN’s ccNSO in the name of \_all\_ CENTR members for both procedural reasons and the risk of potentially negatively impacting the independent review process.

***CENTR, the Council of European National Top Level Domain Registries is the European Regional ccTLD organisation. CENTR has 58 members, all TLD registries. On 1 August 2010 CENTR members represented more than 61.6 million registered ccTLD domain names.***

***33 CENTR members are a member of the ccNSO. CENTR participates as an observer in the ccNSO Meetings, Workshops and Council.***

1. CENTR comment as defined by the ‘*CENTR Position Development Rules’ 22/06/05* [↑](#footnote-ref-1)
2. GAC Principles for ccTLDs, Article 1.2: *“The main principle is the principle of subsidiarity. ccTLD policy should be set locally, unless it can be shown that the issue has global impact and needs to be resolved in an international framework. Most of the ccTLD issues are local in nature and should therefore be addressed by the local Internet Community, according to national law.”* [↑](#footnote-ref-2)
3. question 4.1: *How would you rate your understanding of the purpose for which the ccNSO was set up?* [↑](#footnote-ref-3)