AFNIC Comment on
Organisational Review of ICANN's
Country Code Names Supporting Organisation (ccNSO)

AFNIC is the manager of French country-code top level domains *.fr, .re, .tf, .wf, .pm* and *.yt*. We are a not-for-profit, multistakeholder organisation founded in 1997.

AFNIC is a member of ccNSO and a founding member of CENTR, the European regional organisation of ccTLDs gathering 57 ccTLD managers.

AFNIC welcomes the opportunity to comment on the ITEMS report on the organisational review of the ccNSO. Our comments on the recommendations follow below. Please note that a majority of these comments are consistent with the comments from CENTR, with additional remarks on recommendations 1 et 11.

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.*

AFNIC Comment:
We believe that this recommendation is misleading in its formulation. While we support the establishment of a lightweight comment mechanism for the ccNSO, this should not be a substitute for the actual policy decision process.

The scope of the policy development role of the ccNSO is strictly defined by the Bylaws, and the current PDP is appropriate to ensure that any policy that would be developed by the ccNSO fits within this narrow scope.

However, the ccNSO also interacts with other SOs and ACs within ICANN. These interactions are not necessarily policy by themselves, but sometimes express the ccNSO's view on such matters as the security of the DNS, IDN ccTLD implementation, etc. We believe a comment mechanism whereby the ccNSO could clarify the interaction with the membership and ccTLD community would be extremely helpful to strengthen the value of such comments.

> **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.*

AFNIC 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. Lack of participation should not only be attributed to the lack of translated documents.

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*

AFNIC 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.*

AFNIC 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.*

AFNIC 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.*

AFNIC Comment: While we would have no problems with the Registrar Stakeholder Group engagement, registrars and registrants impacted by ccTLD policies are primarily at national level. 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.
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We doubt that this recommendation really recognise the limited role of the ccNSO?

> **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.*

AFNIC 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.

> **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).*

AFNIC 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 (eg 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".*

AFNIC Comment:

It is unfortunate that he interviews & questionnaires did not cover this area, but we understand, as the report itself states, that ICANN provided ITEMS with clarification that this area was not included in the review.

We consider highly 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[1]. 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.

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[1] 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."*