

## Report of Public Comments

<b>Title:</b>	<b>Interim report on support Significantly Interested Parties for ccTLD Delegation or Redelegation requests</b>		
<b>Publication Date:</b>	22 May 2012		
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<b>Comment Period:</b>		<b>Important Information Links</b>	
Open Date:	3 February 2012	Announcement	
Close Date:	20 April 2012	Public Comment Box	
Time (UTC):	23.59	View Comments Submitted	
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<b>Section I: General Overview and Next Steps</b>			
<p>The ccNSO Framework of Interpretation Working Group (Foi WG) sought public comment on its recommendations on obtaining and documenting support from "Significantly Interested Parties" (formerly known as Local Internet Community or LIC) for requests for delegation and re-delegation of a ccTLD. The recommendations contained in the report are proposed interpretation of existing policy and guidelines.</p> <p>The WG closely reviewed the submitted comment to determine whether to modify its report. According to its charter the WG is not obligated to include all comments made during the comment period, nor is it obligated to include all comments submitted by any one individual or organization.</p> <p>The Working expects to publish its Final Report prior to the next ICANN meeting in Prague, Czech Republic (June 2012)</p>			
<b>Section II: Contributors</b>			
<i>At the time this report is prepared one (1) comment was received, excluding 1 spam email. The contributor is listed below.</i>			
<u>Organizations and Groups:</u>			
<b>Name</b>	<b>Submitted by</b>	<b>Initials</b>	
Not applicable			
<u>Individuals:</u>			
<b>Name</b>	<b>Affiliation (if provided)</b>	<b>Initials</b>	
Antony Van Couvering		AVC	

### Section III: Summary of Comments

*General disclaimer: In this section a broad and comprehensive summary of the comments is provided. It is not intended to include every specific aspect or stated position by the contributor. If the reader is interested in specific aspects of any of the summarized comments or the full context, she or he is advised to read the specific contributions, which can be found through the link referenced above ( View comments submitted)*

#### Comments AVC:

In general the continuing reference to RFC 1591 and the effort to define and Significantly Interested Parties is supported. However, at the same the working group is requested to consider:

1. Job performance, whether actual or prospective (in particular in the case of “ hostile” re-delegations i.e. where the incumbent manager does not want to be removed) as a basis for decisions in delegation and re-delegation cases;  
Explicitly include the local and global Internet community as "significantly interested parties." Although it is not easy to say what the "Internet community" is, or how to find out what it thinks, or how to engage it effectively. That doesn't change the fact that the a top-level domain serves the local and global Internet communities, and they should not be excluded having a say in who runs it, and how it is run.

### Section IV: Analysis of Comments

*In this section an analysis and evaluation of the comments received are provided, with an explanation by the Working Group.*

The Framework of Interpretation working group was established to develop and propose a "Framework of Interpretation" for the delegation and re-delegation of ccTLD's pertaining to the issues identified by the Delegation Re-delegation and Retirement Working Group (DRDWG). The FoIWG Interim Report on Significantly Interested Parties deals with obtaining and documenting support for requests delegation and re-delegation requests and refers to the following issues pertaining to topic of “ Interested Parties” as identified by the DRDWG:

*“An analysis of all approved delegation and re-delegation requests published by ICANN indicates a significant degree of inconsistency in applying the “Interested Parties” requirement. This includes the approval of a number delegation and re-delegation requests which have no documentation indicating any support by Interested Parties.”*

“Job performance” as suggested, is not considered to be an element in obtaining and documenting support for a delegation and re-delegation request and is therefore considered out of scope for this topic. However, without assessing the merits of the concept, “job performance” or comparable concepts are taking into account by the FOIWG in its discussions of un-consented re-delegations, the next major topic on which the working group will report.

With regard to including the terms local and global Internet community as part of the “Significantly Interested Parties” whose support should be obtained and documented for a delegation and re- delegation request:

As stated in the policy documentation a ccTLD manager is supposed to serve the the local and global Internet communities. However, and as stated in the Interim report, there is no clear and unambiguous relationship between ‘serving the local interest’ and obtaining support for a delegation or re-delegation.

The working group has also noted that for identification of the “interested Parties” whose support should be obtained and documented support for a delegation and re-delegation requests, a number of terms are used:

1. RFC1591 refers to SIP and Parties that may be concerned or affected
2. The GAC Principles 2005 refer to the Stakeholders.
3. IANA procedures refer to the LIC.

The FOIWG concluded this may lead to confusion and ambiguity and ICANN and IANA should use a single term when referring to “interested parties”.

Therefore including a reference to local and global Internet community in the definition of Significantly Interested Parties would be counter-effective to create colour and depth and more clarity on obtaining and documenting support for a delegation and re-delegation request.