

ICANN DRAFT 2011-2014 STRATEGIC PLAN PUBLIC COMMENTS SUMMARY

Sources:

Public Comments postings (27 Nov. 2010-25 Jan. 2011). The full text of the comments may be found at <http://forum.icann.org/lists/stratplan-draft-2011/>.

GENERAL COMMENTS

The plan should be “action-oriented”. Together with key routine activities, new actions must be undertaken in each of the work areas to make the strategy “action-oriented.” *AFRALO (6 Jan. 2011)*.

Plan neglects cities’ interests; recommendations to rectify this gap. The draft Strategic Plan continues to neglect cities. Some may say that cities are eligible for TLDs, but are they prepared? The following recommendations (from the recent IGF City-TLD Workshop in Vilnius) should be considered for the development of a city element included in the final Strategic Plan:

- City-TLD proponents should prepare a preliminary definition of public interest TLDs, using resources such as the Paris Understanding.
- An organization of proponents of public interest city-TLDs should be formed.
- Literature should be prepared to inform mayors of the world about the utility of city-TLDs, and it should be distributed through their best practices organizations.
- Via petition and other mechanisms, the advantages of a thoughtful and rapid approval process for city-TLDs should be presented to ICANN.
 - Such petition to ICANN should note that the operation of city government, the quality of city life, and the sustainability of cities will be improved by thoughtful issuance and development of city TLDs.
 - Such petition should also note the unsuitability of the proposed filing fees, technology requirements, and registry/registrar separation for city-TLDs proposed in the Draft Application Guidebook, especially for cities in less developed areas.
 - The petition should note that acceptance of city-TLDs as a distinct category of TLDs governed under the existing laws of nation-states, unencumbered by traditional concerns about trademark stress, and governed by responsible entities, will free ICANN to focus on more problematic TLD categories.
- Nation-states should be contacted through the members of ICANN’s Government Advisory Committee (GAC) and other channels and be requested to assemble a list of cities with an existing interest in TLDs.
- A list of cities proposing public-interest TLDs should be submitted to ICANN. Cities on such a list should be processed and approved in an expedited manner.
- A dedicated unit within ICANN should be created to process public-interest city-TLD applications.
- The city-TLD advocacy organization should create city-to-city processes and communication channels to share best practices.

Connecting.nyc (25 Jan. 2011).

ICANN responsibility regarding cities’ interests. It is ICANN’s responsibility to present to cities the case for the potential of city TLDs. E.g., .paris cannot be treated the same as .shop. TLDs

can empower U.S. cities and enable them to rethink the ways we address the breadth of human needs from the vantage point of a DNS empowered Internet. *Connecting.nyc* (25 Jan. 2011).

Equal value accorded view of end users and translations of working documents. ALAC is especially keen to see further mainstreaming of the principle of equal value accorded the views of end users in the multi-stakeholder bottom-up approach to policy development enshrined in the Affirmation of Commitments. To strengthen this, ALAC urges further effort in translation of working documents into the five UN languages, especially those used for stakeholder consultations. *ALAC* (11 Jan. 2011).

Feedback requested from ICANN. In order to ensure a full circle of communication which will provide us the ability to inform our community and so that we can learn from this process, ALAC requests from ICANN brief yet comprehensive feedback on our statement, including the extent to which ALAC's comments were incorporated. *ALAC* (11 Jan. 2011).

DNS STABILITY AND SECURITY

DNSSEC implementation. ICANN should prioritize support for DNSSEC implementation. *AFRALO* (6 Jan. 2011).

TLD operator training.

AFRALO appreciates ICANN's initiative to perform training for TLD operators. *AFRALO* (6 Jan. 2011).

DNSSEC implementation should be given higher priority in ICANN operational plans. The initiative to provide DNSSEC training to TLD operators around the globe is an important component of the process. ALAC particularly supports the proposed Staff initiative under "cooperative TLD training in developing countries". This is especially important given additional security risks (e.g. phishing) spawned by IDNs introduction and it emphasizes ALAC's statement that ICANN should increase international participation in unique identifier security, inclusive of training in end user communities. The At-Large community consensus is for a closer synergy of user communities, especially the IDN language groups, in development of security policies and measures to mitigate these risks. *ALAC* (11 Jan. 2011).

Key performance indicators. The definition and design of key performance indicators (KPIs) which could be used for strategic purposes is currently missing from the strategic objectives. If KPIs existed, it would be possible to track, e.g., a measure of the number of incorrectly synthesized DNS responses. This should be part of a set of definable metrics of what constitutes DNS stability. The next step would be to ensure that contracts and staff operations work towards maximizing the stability indicators. *ALAC* (11 Jan. 2011).

IPv6 rollout. The mention of IPv6 rollout at the three levels (Community Work, Strategic Projects and Staff Work) is a positive and welcome development. *ALAC* (11 Jan. 2011).

Resource Public Key Infrastructure (RPKI). ALAC welcomes the rollout of the RPKI in the American Registry for Internet Numbers (ARIN) region and in other regions. *ALAC* (11 Jan. 2011).

ICANN continuity plan. ICANN should come up with a plan for Disaster Recovery and Business Continuity for its own operations. *AFRALO (6 Jan. 2011). ALAC (11 Jan. 2011).*

Clarify the DNS uptime strategic objective. It is unclear what the strategic objective—maintain and drive DNS uptime—refers to, i.e., whether the 100% DNS uptime refers to the A-M root servers, or to the (.arpa, .mil, .edu, .gov, .int, .com, .net, .org) authoritative gTLD servers which pre-exist ICANN, or to the authoritative gTLD servers created by ICANN, or to authoritative ccTLD servers, or to AS112, or to the recursive servers operated by content and access network operators, or where any measurement of “uptime” might be conducted.

- The A-M root servers are fine and the authoritative gTLD servers are generally acceptable. Any problems related to them are not at the level of a strategic effort that has to put “change” before “stability.”
- This leaves the ccTLDs, for which no “strategic goal” is possible given the botched attempt to force ccTLD operators to enter into contracts or be unable to update their entries in the IANA root zone, AS112, and recursive resolvers widely known to be providing synthetic (monetized) returns for most broadband users in North America--a situation that does call for a strategic object, following through on the Board’s Sydney Resolution on NXDOMAIN Substitution (DNS Wildcard and Similar Technologies).
- A strategic goal of reducing incorrect synthesized DNS responses by some measurable amount would be credible and useful. Absent that, this is just a bag holding secondary objectives—continuity and v6.

NARALO (10 Jan. 2011).

The goal of increasing security of the overall systems of unique identifiers errs significantly.

- First, if 30 ccTLD operators in developing countries (who are generally technical assistance recipients through the Network Resource Startup Center) sign their zone, that is a poor predictor of whether when the keys for those signed zones expire the key rollover will be conducted successfully.
- Second, there will be issues if ICANN is flirting with returning to the unhappy model of “enter into contracts or else” by placing the Marina del Rey agenda for zone signing ahead of the autonomous agendas of developing countries (noting prior Conficker example where costs were pushed onto ccTLD operators in developing countries).
- Third, fixing .com comes before fixing .name, which is larger than all 22 ccTLD operations where Arabic is the primary spoken language, or all of Africa less South Africa. The real item to work on here is the routing (not “resource”) public key infrastructure, securing BGP and detecting AS Prepending attacks, which at present appear to be fatfinger events and not information operations by motivated and competent parties pursuing rational economic or other policy goals. The buried lede is the most important and overlooked task; this, not uptime, is what is important. Fortunately, the RPKI infrastructure is being rolled out in the ARIN region and has been rolled out in other regions.

NARALO (10 Jan. 2011).

DNS CERT.

The DNS Stability and Security section needs improvement; it is worded in a way that appears to predict a specific outcome from the community-led process. It is inappropriate to have an explicit reference to the idea of a DNS CERT, which appears to pre-judge the work of the cross-community working group before that work has even started. It also appears to limit the work of the Joint DNS Security and Stability Analysis Working Group and its express objectives. Given this, the sentence in the Draft Strategic Plan could better read as: “ICANN will follow the *work* of

its *cross-community* working groups to develop an approach to the establishment of *appropriate* solutions to address issues of Internet security.” *Nominet (10 Jan. 2011)*.

ALAC is concerned that the Strategic Plan is pre-empting the outcomes and recommendations of the Joint DNS Security and Stability Analysis Working Group (DSSA WG) with the sentence which begins “ICANN will follow the lead of its community working groups to develop an approach to the establishment of solutions such as coordination of an emergency response team (DNS CERT) to address one of the issues of Internet security.” This text should be deleted. The amended text would read: “ICANN will follow the lead of its community working groups to develop an approach to the establishment of solutions to address issues of Internet security...” *ALAC (11 Jan. 2011)*.

The recent DNS Security Survey for National Computer Security Incident Response Teams did not have a statistically valid response rate to draw any broad conclusions or to justify any decisions on the way forward. *Nominet (10 Jan. 2011)*.

The addition of the IDN version of the perennial WHOIS food fight is a mistake. Whatever the value may be of adding UTF-9 or local encoded data into WHOIS output, it is not DNS stability and security. This detracts from the real issues. *NARALO (10 Jan. 2011)*.

Coordinating global risk management.

Regarding the goal of coordinating DNS global risk management, it fails to mention the Conficker .C facts, so the most recent “global risk management” event of import is overlooked. This is unfortunate because there is a lot to learn from the response, even to a non-event, about cost, timeliness, and accounting. *NARALO (10 Jan. 2011)*. *ALAC (11 Jan. 2011)*.

Overall there is no reason why most of the ccTLD operators outside of North America and Europe should pay attention to ICANN’s DNS stability and security StratPlan component. That is not in the public interest of North American users, who do not need ICANN to be ignoring development goals for false objectives and band aids. *NARALO (10 Jan. 2011)*.

Under “Coordinate DNS global risk management”, it should be made clear that this refers to gTLD registry and ICANN accredited registrar continuity planning. Nominet welcomes ICANN working with the community (in particular the regional organizations) to provide training for TLD operators. However, the wording of the phrase “ICANN will also enhance collaboration with the global computer security and incident response community to improve BCP and testing to address risks and threats...” again appears to pre-empt the work of the DSSA-WG. This could more appropriately read as: “...will encourage collaboration with the global computer security and incident response community to improve...” and “seek to promote work in the community to develop...” *Nominet (10 Jan. 2011)*.

Community effort. The term “bully pulpit” conveys an inappropriate connotation for what needs to be a community effort in addressing security, stability and resilience issues. It would be better to express this less in terms of bullying and more by underlining the importance of developing common community understanding (e.g., “...and certain areas where we can help influence thinking or question assumptions”). *Nominet (10 Jan. 2011)*.

Regional and local efforts. ICANN should prioritize support for regional and local efforts promoting stability, security and resiliency (SSR) of the unique identifier systems instead of duplicating or commandeering its centralization. Focus should be on DSN security, IPv6 and IP security, including funds and resources for RIRs, ALSes and other appropriate organizations.

ICANN's priority should be to support regional and local organizations to become leaders in SSR promotion rather than followers of ICANN. *ALAC (11 Jan. 2011).*

CONSUMER CHOICE, COMPETITION & INNOVATION

Cross-community work. ALAC and the At-Large community are particularly concerned that the Strategic Plan will note and take into account the outcomes of the cross community work (ALAC, GAC, GNSO and ccNSO) on establishing the definition, measures, and three year targets for those measures, for competition, consumer trust and consumer choice in the DNS, which will be provided for discussion at the ICANN San Francisco meeting in March 2011. This includes ALAC's call for greater strategic attention to "end user rights". *ALAC (11 Jan. 2011).*

New TLDs application fee level.

In line with the core value of introducing and promoting competition in the delegation of TLDs, ICANN should make the application fee for new TLDs within the reach of each applicant. A high application fee for all applicants creates disparity—i.e., haves and have-nots. The applicant guidebook should be reviewed to reflect the almost unanimous wish regarding application fees expressed in public comments on the previous versions, in the Working Group 3 report approved by ALAC (At-Large Summit, Mexico), and in the JAS Working Group milestone report. *AFRALO (6 Jan. 2011).*

All RALOs are highly supportive of the view that levying high application fees for all applicants emphasizes the disparity between "haves and have-nots" (or developed and developing countries). Through Joint Applicant Support the new gTLD program should benefit local communities directly. This has been a key At-Large initiative since the 2009 Mexico City At-Large Summit. *ALAC (11 Jan. 2011).*

IDNs.

AFRALO notes the positive initiative to provide effective program management for the successful deployment of IDNs through the new gTLD and ccTLD programs. *AFRALO (6 Jan. 2011).*

The At-Large community is pleased that IDNs are providing consumer choice and hopes that the new gTLD program will be beneficial to healthy competition and an increase in regional participation in the industry. ICANN should follow the AoC and prioritize efforts to implement complete IDN TLDs policies and mechanisms that serve the most needed IDN communities. *ALAC (11 Jan. 2011).*

More IDNs. If the principle of consumer choice is to be meaningful, then consumers' choices should inform policy makers, not producer choices. The strategic plan should place the interests of the 1+ million current IDN users ahead of the legacy operator interest in capturing lucrative markets. *NARALO (10 Jan. 2011).*

More languages and cultures.

It is impossible not to observe that the strategic goal of more languages and cultures is subordinate to the strategic goal of a single application process. As has been observed elsewhere, this benefits a "group of participants that engage in ICANN's processes to a greater extent than Internet users generally." *NARALO (10 Jan. 2011).*

The strategic goal of “more languages and cultures” should far exceed the one of a single application process, something not apparent in the current draft Strategic Plan. *ALAC (11 Jan. 2011)*.

Increased regional participation in the industry. Continued financial support for the NSRC's IROC, AROC, SROC offerings is a reasonable goal. *NARALO (10 Jan. 2011)*.

Malicious conduct mitigation.

The “malicious conduct” construct has, thus far, avoided mention of the causes for operational capability of actors that engage in conduct characterized as “malicious”. It is primarily an individual morality construct, carefully omitting the business models which create the financial incentives as well as the technical means for “malicious conduct” on a global scale. Signing zones as a consequence of the discovery that cache poisoning could be accomplished in seconds is a reasonable response to the discovery of an economic development in attack cost. Ignoring the non-adoption of BCP-38 and other forms of industrial externalization of costs, to ccTLD operators in the Conficker .C case, is not a reasonable response to a long-standing problem. Morality as policy is fine on TV but is a profoundly dull tool for network policy making. *NARALO (10 Jan. 2011)*.

Regarding malicious conduct mitigation, the At-Large community is ready to help drive the process of developing a Registrant Rights Charter in collaboration with the rest of ICANN. *ALAC (11 Jan. 2011)*.

Fair opportunities.

The reference to the area of work undertaken by the Joint Applicant Support Working Group is gratifying. *NAROLO (10 Jan. 2011)*

The statement “Promote fair opportunities for open entry to internet-related markets around the globe” is too broad for ICANN’s limited technical role. A more realistic objective would be: “to provide a domain name market that is able to underpin internet-related markets around the globe.” *Nominet (10 Jan. 2011)*.

Education and training by ICANN constituencies. Conducting education and training programs in partnership with ISOC, local operators and local Internet communities is an excellent approach, but part or all those programs could and should be conducted by ICANN constituencies (i.e. At-Large structures and regional organizations according to their core competencies). E.g., each ICANN meeting in Africa should be an opportunity to conduct training workshops for the African communities. *AFRALO (6 Jan. 2011)*. *ALAC (11 Jan. 2011)*.

Stable evolution of the unique identifier system. Stable evolution of the unique identifier system is fundamental to ICANN’s role. Fostering industry innovation has to be seen in this context and should also be based on the public benefit that the Affirmation of Commitments puts at the heart of ICANN’s role. *Nominet (10 Jan. 2011)*.

CORE OPERATIONS INCLUDING IANA

Support for renewal. The At-Large community supports ICANN’s decision to submit a proposal for the IANA contract renewal based on ICANN’s track record and other factors including the

confidence that ICANN's multistakeholder model of bottom-up governance significantly contributes to good standing regarding core operations. *ALAC (11 Jan. 2011)*.

Transparency and collaboration. AFRALO notes positively ICANN's willingness to provide the international Internet community a transparent and collaborative model for root server operations. *AFRALO (6 Jan. 2011)*.

Continued flawless IANA operations. This goal's positing of the utility of the EFQM model to IANA operations does not match experience from the IANA function reporting project in 2007. Further, the SLAs to which the EFQM might or might not be relevant to originate from the IETF for protocol assignments. If ICANN is to secure renewal of the IANA contract, it is at least as likely that the merits of ICANN's renewal bid are the qualitative services necessary to manage mixed signed-and-unsigned zones and the qualitative services necessary to introduce RPKI, as the quantitative execution of a formal quality model indifferent to the current and future services performed by the IANA function. *NARALO (10 Jan. 2011)*.

L-Root operational excellence. This goal pursues a mission outside of ICANN's core purpose. How is ICANN going to "lead by example" or "be recognized as a top-tier root zone manager"? What motivates ICANN to embark on a (probably futile) pecking order mission to provide clue to any of, let alone all of, the other root server operators (e.g. Verisign-A, USC-ISI, Cogent, UMaryland, NASA, etc.)? A reasonable strategic objective would be to find a qualified operator for the L-Root that would meet some unmet policy goal such as geographic diversity and schedule the transition so that ICANN could get out of registry operations and focus on its core mission. *NARALO (10 Jan. 2011)*.

Efficiency and effectiveness of operations. What does the IANA function have to do with the policy development process the Names Council has adopted? The suggestion that the execution of the IANA functions services deliverables to the GNSO's PDP, pre- or post-reform, requires strategic attention indicates that either due to errors in wordsmithing, or leadership (of ICANN and IANA) changes, that the relationship, never very significant, between the original DNSO, now GNSO, and the IANA, is not understood. *NARALO (10 Jan. 2011)*.

Staff retention and engagement. Nominet is pleased to see that staff retention and engagement now feature as a fundamental component of improving efficiency and effectiveness of operations. This needs to be across the organization and not simply in the operational elements of ICANN's work. This organizational continuity will be particularly important over the life of this strategic plan. *Nominet (10 Jan. 2011)*.

Strengthened international operations and presences.

This objective mentions engagement with the IETF and the root server operators. The RPKI communities of each of the RIRs should be added. *NARALO (10 Jan. 2011)*.

With the growth of IDN ccTLDs, and potentially of IDN gTLDs in the future, Nominet recognizes the need for ICANN to be able to work with partners across the globe. Nominet however questions whether this requires ICANN to establish a presence, a strategy that will be demanding on management resources and extremely costly. Nominet suggests that it would be more appropriate to say "will continue to require ICANN to ensure an appropriate ability to work with the relevant partners." *Nominet (10 Jan. 2011)*.

Improving the financial system and controls. Nominet welcomes the dashboard and recommends benchmarking some of the key measures to demonstrate delivery of these aims. *Nominet (10 Jan. 2011).*

Long term IANA functions responsibility. This objective is without quantifiers. What are the strategic goals for financial controls, capacity, etc.? *NARALO (10 Jan. 2011).*

Policy development.

AFRALO acknowledges ICANN's commitment to improving the efficiency and effectiveness of policy development and implementation processes and the multistakeholder model that engages the global community. *AFRALO (6 Jan. 2011).*

The At-Large community supports the aim of improving the ongoing efficiency and effectiveness of policy development and implementation processes that engage the community. The At-Large community also agrees with the GNSO initiative to improve the PDP. The At-Large community encourages and supports the following additional initiatives:

- Continuous improvement toward operational excellence is welcome and we support ICANN's engagement with the technical community including the IETF and root server managers.
- The RALOs note positively ICANN's willingness to provide a transparent and collaborative model for root server operations to the international Internet community. The RALOs fully support renewal of ICANN's contract based on its track record, taking into account ICANN's independence and internationalization.
- The application of process improvements suggested by the European Foundation for Quality Management is a positive source of SLA commitments.

ALAC (11 Jan. 2011).

A HEALTHY INTERNET ECO-SYSTEM

Support.

Nominet generally welcomes this section which usefully focuses on listening to and working with the multistakeholder community and improving communications. *Nominet (10 Jan. 2011).*

The At-Large community fully supports the recommendations in this section. As a reminder, the At-Large community is a core constituent of each one of the core strategic objectives in this section. The At-Large community welcomes Internet Governance education and urges ICANN to make better use of the networks and unique outreach strengths of the At-Large community's organizational structure of five RALOs and currently 129 ALSes in more than 80 countries around the world. *ALAC (11 Jan. 2011).*

One unified global Internet.

- This section contains the alarming possibility that the overwhelming contributions of volunteer time, paid staff and expended resources committed to the new gTLD program since 2006 have only a "potential" to realize a single new community-based or public interest registry.
- It is in the public interest that public policy is informed by data and that both the failures and successes of policy choices can be discerned and outcomes understood in terms of causes and effects.

- Legal barriers particular to the North American Region's legal culture prevent research access to operational network infrastructures for reasons of economics, ownership, and trust (EOT). These must be reduced if policy making is to be informed by knowledge rather than by belief.
- The vision statement should be amended to correct the impression that some more fundamental management problem exists than managing the sources of policy errors which have necessitated the existence of the CNNIC root server constellation (activated by CNNIC in November 2001), and the continued necessity for divergence between this system and the original constellation of name servers. It is not in the public interest for North American Internet users to be unaware that errors of judgment have partitioned and may further partition the Internet. These two changes to the vision statement may be expressed as: "informed by data, divided only by necessity."

NARALO (10 Jan. 2011).

Given the majority North American presence in existing registry and registrar operations, ICANN would need to truly internationalize this function in order to reach a truly healthy Internet ecosystem. *ALAC (11 Jan. 2011).*

Building stakeholder diversity—At-Large Community.

This objective contains a gratifying reference to the ALAC, though the language reads "representing" rather than "elected by" when referring to a seat on the ICANN Board. *NARALO (10 Jan. 2011).*

The At-Large community welcomes the formalization of its input into Board discussion, but it is erroneous to say that the new Board seat "represents" the At-Large community; rather it is a seat whose occupier is "selected by" the At-Large community. *ALAC (11 Jan. 2011).*

Improved communications. This objective seems underdeveloped relative to the others. Adding a technical and policy journal (similar to Jacobson work for InterOp and Cisco) would be more useful than more web ephemera. *NARALO (10 Jan. 2011).* *ALAC (11 Jan. 2011).*

Ongoing accountability and transparency—barriers to obtaining and analyzing operational data.

- Data as a necessary predicate condition to "ensure the stable and secure operation of the Internet's unique identifier systems" is absent. This is very unfortunate because for each year of the past decade, persons with nothing more than beliefs have dominated ICANN's policy making.
- Available data is not good. We are running out of addresses and must make a partially planned transition without widespread testbed experience of the new infrastructure. The routing system is also at the limits of its scalability. There are pervasive peer-to-peer overlay networks which are incongruent with economic models, and therefore the source of fundamental legal struggles over ownership and control. The security and stability of the naming, addressing and routing infrastructure is problematic, independent of anything ICANN is on record contemplating as its plan of record.
- Absent operational data concerning unique endpoint identifiers, unique routing identifiers and protocols, stable and secure operations are indistinguishable from unstable and insecure operations. The DNS remains a private resource where access to profoundly important operational data necessary for basic research on the range of meaningful policy alternatives is at the whim of commercial entities acting under private law.

NARALO (10 Jan. 2011). *ALAC (11 Jan. 2011).*

Steering outside the self-similar comfort zone of corporate and suburban residential service and marketing profiles is the better course. *NARALO (10 Jan. 2011)*.

Continued internationalization. Continued internationalization of ICANN is crucial to maintaining a single, global interoperable Internet and a single Internet zone file used globally. *AFRALO (6 Jan. 2011)*. *ALAC (11 Jan. 2011)*.

AFRALO notes positively that ICANN will formalize a cross-stakeholder model and will formalize input from the At-Large community into Board discussion. *AFRALO (6 Jan. 2011)*.

The At-Large community would welcome working with ICANN to define its own function within Public Participation and Accountability in time for it to be included in future Strategic Plans. This plan would include “outreach” and “in-reach” (i.e., effective engagement of current At-Large ALSes), capitalizing on the fellowship program and the provision of online interactive workshops and material to educate community leaders and participants about ICANN.

- ALAC reiterates the At-Large community’s plan of reaching out to communities worldwide so as to have at least one (1) ALS per country. We need a regional approach and an in-reach/outreach program for the propagation of knowledge and the raising of awareness in the Internet community and beyond.
- This unique resource needs to be sustained through one localized General Assembly per RALO per year, as well as an institutionalized At-Large Summit every three years, with an interval no larger than four (4) years to keep grass-roots interest high. ALSes would work on a mix of ICANN-defined strategic subjects as well as grass-roots-defined issues, whether local, regional or international. It is worth noting that during the signing of MOUs between ICANN and the five RALOs there was no doubt about the commitment of support for the RALOs including financial assistance to ensure the holding of a regular General Assembly (not including translations and interpretation).

ALAC (11 Jan. 2011).

Language translation.

More commitment is needed to provide translation of all ICANN documents and simultaneous interpretation in all meetings (face to face or remote). This interpretation is urgently needed for the fellowship program which is now restricted to English speakers only. *AFRALO (6 Jan. 2011)*. *ALAC (11 Jan. 2011)*.

ALAC acknowledges the hard work done by the new translators group led by ICANN staff; this group should be sustained. Due to technical and specific vocabulary used in meetings it is of utmost importance to maintain a stable team of translators. *ALAC (11 Jan. 2011)*.

The number of languages should be increased not only to include Brazilian Portuguese native speakers in the region but also other languages such as Chinese, Russian, Arabic, etc. *ALAC (11 Jan. 2011)*.

International engagement—recognition of At-Large role and resources in the Strategic Plan.

ALAC/the At-Large community is already the most international (in terms of global representation and outreach to regions as measured by country) component part of ICANN and is directly connected to the Internet end user and domain name registrant. As such ALAC/At-Large not only supports ICANN taking a strategic and prioritized approach to enhanced, effective and meaningful international engagement with other key actors and participants in the Internet ecosystem, but also believes that our local, country and regional knowledge, and experience and ongoing interaction with these various actors and stakeholders in the local

communities we represent, is an underutilized yet highly effective resource in this activity that should be recognized in the ICANN Strategic Plan for 2011-2014. *ALAC (11 Jan. 2011)*.

Internet governance education. AFRALO appreciates the commitment to provide Internet governance education to an expanding group of international participants and to promote programs that enhance global participation. The AFRALO ALSes need this kind of education, coupled with more training on ICANN related issues at the local, national, sub-regional and regional levels to reach an effective participation in the ICANN policy development process. *AFRALO (6 Jan. 2011)*.

Improve ICANN participation in Internet governance events. ICANN's participation in Internet governance events such as IGF and WSIS is highly important. ICANN's participation should not be limited to formal speeches or a parallel ICANN event. Rather, ICANN needs to be more effective by organizing substantial workshops addressing actual subjects and involving the large population of the forum. Such participation will give ICANN more visibility and better credibility. The impact of these substantial workshops will be greater if they are organized by ICANN constituencies rather than the ICANN staff and/or Board. *AFRALO (6 Jan. 2011)*. *ALAC (11 Jan. 2011)*.

INFLUENCE (EXTERNAL) V. CONTROL (ICANN)

New plan goals. The At-Large community fully supports the new plan goals of reorienting objectives to distinguish areas of control vs. influence plus adding measurable indicators of plan success. ALAC welcomes these developments and recommends performance evaluation criteria (indicators and/or metrics) be applied for greater accountability. *ALAC (11 Jan. 2011)*.

PROCESS

ICANN should establish and commit to an organized process for the strategic plan. The feedback that ICANN professes to desire is being compromised by the ICANN process itself, or lack thereof. There has been no commitment to timelines and process. *CIRA (25 Jan. 2011)*. *Nominet (10 Jan. 2011)*. *SOP WG (24 Jan. 2011)*.

ICANN should increase the public comment period to 60 days to ensure sufficient time for community members to provide appropriate feedback. *CIRA (25 Jan. 2011)*. *SOP WG (24 Jan. 2011)*.

Delays in preparing the draft strategic plan and the short time available for comments raise concerns. More time should be made available for input to the consultation. *Nominet (10 Jan. 2011)*.

ICANN's accountability has been compromised, which is ironic considering that this is one of ICANN's key strategic objectives. The process contradicts previous comments made by ICANN's Chair and CEO on the desirability of community participation in the strategic planning process. *SOP WG (24 Jan. 2011)*.

Planning cycle. ICANN should revamp the planning cycle with a more concerned eye to the timing of events (e.g., disadvantages to community when the timing extended for participants

falls during holiday periods). *ALAC (11 Jan. 2011)*.

Response to community input. The At-Large community is pleased to see the new process for engaging community input at an earlier time, inclusive of definitive measures to demonstrate the impact of such input. The ALAC is unanimous that these developments can only lead to better accountability and legitimacy with the community as a whole. This reinforces the notion of the bottom-up process within ICANN. *ALAC (11 Jan. 2011)*.

Board approval. The new plan for getting Board approval is a significant improvement. The planning team consultations with Working Groups and constituencies have engaged the constituencies immediately and helped bring ownership of the plan closer to the edges. ALAC hopes this process will be upheld in future Strategic Plan development cycles and reinforced through enhanced collaboration between ALAC and the planning team. ALAC will strive to ensure better communication with ALSes so that the edges of the At-Large organizational structure have a greater voice with which to enhance the process of global involvement in the bottom-up global stakeholder governance model. *ALAC (11 Jan. 2011)*.

STRATEGIC METRICS

Performance metrics and benchmarks. CIRA is pleased that the draft strategic plan includes a commitment to “world-class accountability and transparency.” CIRA supports the Accountability and Transparency Review Team (ATRT) recommendations, particularly those that suggest implementing performance metrics and benchmarks in order to track compliance with ATRT standards. ICANN should adopt the ATRT recommendations. In fact, developing performance metrics and indicators for all strategic objectives and priorities contained in the Strategic Plan will improve overall accountability. Accountability and transparency regarding decision making is also key; ICANN should identify the reasons for decisions, point to arguments that opposed their decisions and explain why they were not accepted. *CIRA (25 Jan. 2011)*.

RESPONDENTS

AFRALO
At-Large Advisory Committee (ALAC)
Canadian Internet Registration Authority (CIRA)
ccNSO Strategic and Operational Planning Working Group (SOP WG)
Connecting.nyc Inc. (Connecting.nyc)
NARALO
Nominet