

## **Registries Stakeholder Group**

### **Overview of Public Comments 2021**

*Update January 2022*

#### **PUBLIC COMMENTS**

##### **1st quarter 2021**

Priority 2 Policy Recommendations for ICANN Board Consideration from EPDP Phase 2  
Draft FY22-26 Operating & Financial Plan and Draft FY22 Operating Plan & Budget  
Second Security, Stability, and Resiliency (SSR2) Review Team Final Report  
Additional Reference Label Generation Rulesets (LGRs) for the Second Level  
IANA Naming Function Review: Recommendation for an IANA Naming Function Contract Amendment  
EPDP Phase 2 Policy Recommendations for Board Consideration

##### **2nd quarter 2021**

Initial Report on the Third ccNSO Policy Development Process (ccPDP3): Retirement of ccTLDs  
GNSO Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process Phase 1  
Final Recommendations for ICANN Board Consideration  
GNSO New gTLD Subsequent Procedures Final Outputs for ICANN Board Consideration

##### **3rd quarter 2021**

Draft North America Engagement plan Fy21-25  
EPDP Phase 2A – initial report

##### **4th quarter 2021**

Draft PTI and IANA FY23 Operating Plans and Budgets  
EPDP on Specific Curative Rights Protections for IGOs – initial report  
Proposal for Japanese Script Root Zone Label Generation Rules  
Proposed Revisions to the ICANN Documentary Information Disclosure Policy

#### **OTHER COMMENT OPPORTUNITIES**

Operational Design Phase Concept Paper V2  
Transfer policy review PDP request for early input  
EPDP on Internationalized Domain Names (IDNs EPDP) – Request for Early Input

## PUBLIC COMMENTS

### 1ST QUARTER 2021

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#### PRIORITY 2 POLICY RECOMMENDATIONS FOR ICANN BOARD CONSIDERATION FROM EPDP PHASE 2

The RySG provided feedback on the final recommendations that relate to topics from the EPDP Phase 1 (which have been referred to as “priority 2 topics”). The recommendations related to the System for Standardized Access/Disclosure ("SSAD") which were also adopted by the GNSO Council as part of the EPDP Phase 2 Final Report are **NOT** included in this Public Comment proceeding and are be part of a later Public Comment proceeding (see below).

Links: [RySG Comment \(22 Jan\)](#) – [ICANN Summary Report of Comments \(5 Feb\)](#)

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#### DRAFT FY22-26 OPERATING & FINANCIAL PLAN AND DRAFT FY22 OPERATING PLAN & BUDGET

The RySG raised concerns about the volume and complexity of the Budget documents and provided suggestions to rationalize the documentation and optimize the public comment process. The RySG reiterated that policy development is one of ICANN’s core and most important functions and requires adequate funding, requested ICANN to identify success criteria for its Strategic and Operational Activities, stressed the importance of cost control and of a transparent procedure for Additional Budget Requests, and welcomed ICANN plans to evaluate its Eco-footprint but added that this should not be limited to emissions related to travel.

The RySG commented on the Funding Assumptions and Projections and noted that no rationale is provided for why the current staff number (approx. 400) is the correct number.

The RySG requested ICANN to provide further detail and clarification on the status of the initiative to ‘Develop Internal and External Ethics Policies’, the spending of the 2012 Application fees, and suggested that future budgets would include an overview of anticipated costs for initiatives that are awaiting Board consideration.

Links: [RySG Comment \(15 Feb\)](#) - [ICANN org Report of Comments \(18 March\)](#)

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#### SECOND SECURITY, STABILITY, AND RESILIENCY (SSR2) REVIEW TEAM FINAL REPORT

The RySG expressed strong concern that certain SSR2 recommendations advocate for changes to foundational elements of the multistakeholder model, amongst other recommendations that suggest direct changes to the Registry Agreement.

The RySG urged the Board to reject recommendations where the implementation would represent a violation of contractual provisions or ICANN policy development processes, recommendations that overlap with recommendations of other active reviews and policy processes, and recommendations that would duplicate or undo progress made by the community on DNS Abuse.

In addition, the RySG provided detailed comments on individual recommendations.

Links: [RySG Comment \(9 March\)](#) – [ICANN Staff Report on Comments \(10 May\)](#)

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## ADDITIONAL REFERENCE LABEL GENERATION RULESETS (LGRS) FOR THE SECOND LEVEL

The RySG thanked ICANN for developing and disseminating the LGR resources but reiterated the importance of the balance between security and usability in this field.

Links: [RySG Comment \(11 March\)](#) – [ICANN org Report of Comments \(25 March\)](#)

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## IANA NAMING FUNCTION REVIEW: RECOMMENDATION FOR AN IANA NAMING FUNCTION CONTRACT AMENDMENT

In line with its comment on the IFR Initial Report ([RySG Comment \(2 Dec\)](#)), the RySG supported the amendment.

Links: [RySG Comment \(22 March\)](#) – [ICANN org Report of Comments \(12 April\)](#)

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## EPDP PHASE 2 POLICY RECOMMENDATIONS FOR BOARD CONSIDERATION

The RySG reiterated that despite concerns with individual aspects of some recommendations, which are outlined, at length, in the RySG Statement on the EPDP Phase II Final Report, the RySG nonetheless made the decision to support the entire SSAD package of recommendations, to best support the work of the community in this effort. The RySG encouraged the Board to consider the EPDP Phase 2 recommendations as a single package (like the GNSO council did).

Links: [RySG Comment \(30 March\)](#) – [ICANN org Report of Comments \(19 April\)](#)

## 2ND QUARTER 2021

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## INITIAL REPORT ON THE THIRD CCNSO POLICY DEVELOPMENT PROCESS (CCPDP3): RETIREMENT OF CCTLDS

The RySG expressed no major concerns with respect to the proposed policy recommendations and did not object to separating the policy development effort on the retirement of ccTLDs from the effort on review mechanisms.

Links: [RySG Comment \(13 April\)](#) – [ICANN org Report of Comments \(22 April\)](#)

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## GNSO REVIEW OF ALL RIGHTS PROTECTION MECHANISMS IN ALL GTLDS POLICY DEVELOPMENT PROCESS PHASE 1 FINAL RECOMMENDATIONS FOR ICANN BOARD CONSIDERATION

The RySG, on the whole, supported the ICANN Board adopting the recommendations in the Final Report as written, and shared its concerns with regard to URS Final Recommendation #8 and Sunrise Final Recommendation #1.

Links: [RySG Comment \(20 May\)](#) – [ICANN org Report of Comments \(4 June\)](#)

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## GNSO NEW GTLD SUBSEQUENT PROCEDURES FINAL OUTPUTS FOR ICANN BOARD CONSIDERATION

In a joint Contracted Party House (CPH) comment the RySG and RrSG appreciated the SubPro Outputs as an example of the success of the bottom-up multistakeholder model and supported the ICANN Board adopting the GNSO Council-approved SubPro Outputs and moving forward with an Operational Design Phase for their implementation.

Links: [RySG-RrSG Comment \(1 June\)](#) – [ICANN org Report of Comments \(15 June\)](#)

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## 3RD QUARTER 2021

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### DRAFT NORTH AMERICA ENGAGEMENT PLAN FY21-25

The RySG welcomed the strategy document and suggested defining success criteria for each outcome and KPI to assess performance and success.

Links: [RySG Comment \(1 July\)](#) – [ICANN org Report of Comments \(19 July\)](#)

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### EPDP PHASE 2A – INITIAL REPORT

The RySG submitted its feedback on the recommendations and questions in the Initial report of the EPDP Phase 2A.

Links: [RySG Comment \(19 July\)](#) – [ICANN org Report of Comments \(4 Aug\)](#)

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## 4TH QUARTER 2021

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### DRAFT PTI AND IANA FY23 OPERATING PLANS AND BUDGETS

The RySG welcomed the FY23 budget's prudence, requested more detail regarding the seemingly conflicting priorities of PTI's contractual deliverables and SLAs and other tasks and expectations, and the profile of a

potential additional hire expected to solve this, and suggested some improvements to facilitate more detailed and interactive community comment and input.

Links: [RySG Comment \(23 October\)](#) – [ICANN org Report of Comments \(30 Nov\)](#)

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## EPDP ON SPECIFIC CURATIVE RIGHTS PROTECTIONS FOR IGOS – INITIAL REPORT

The RySG expressed general concern regarding changes to the URS and UDRP processes but can understand that IGOs have cited a unique set of jurisdictional challenges impacting their ability to avail themselves of various rights protection mechanisms (RPMs) and that this work was an attempt to accommodate their specific needs and will be utilized on a very limited basis. The RySG would be supportive of the EPDP reaching out to the GNSO to gather input from the RPM PDP, if possible, on these recommendations prior to finalizing them.

Links: [RySG Comment \(23 October\)](#) – [ICANN org Report of Comments \(20 Dec\)](#)

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## PROPOSAL FOR JAPANESE SCRIPT ROOT ZONE LABEL GENERATION RULES

The RySG reiterated that the development and dissemination of additional resources is appreciated and that the RySG continues to see the value of Internationalized Domain Names (IDNs) to further the goals of competition and consumer choice for internet users globally.

Links: [RySG Comment \(16 Nov\)](#) – [ICANN org Report of Comments \(30 Nov\)](#)

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## PROPOSED REVISIONS TO THE ICANN DOCUMENTARY INFORMATION DISCLOSURE POLICY

The RySG provided input on the proposed updates to ICANN's DIDP to incorporate the CCWG on Enhancing ICANN Accountability Work Stream 2 recommendations.

Links: [RySG Comment \(13 Dec\)](#) – ICANN org Report of Comments (not yet published)

## OTHER COMMENT OPPORTUNITIES

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### OPERATIONAL DESIGN PHASE CONCEPT PAPER V2

The RySG reiterated support for the ODP and its intended goals, appreciated that several concerns flagged in the [RySG Feedback \(20 Nov\)](#) on the ODP Concept Paper V1 have been addressed in the Concept Paper v2.0, and provided additional feedback to recommend establishing clear timelines, use of predictable comment process, and further consideration of the GNSO Liaison position to avoid a single resource for engagement and allow for more flexibility and support.

Links: [RySG Feedback \(22 Jan\)](#)

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### TRANSFER POLICY REVIEW PDP REQUEST FOR EARLY INPUT

The RySG provided early input into the GNSO Transfer Policy PDP Working Group and appreciated that the Working Group is examining various user scenarios, both as a result of changes due to the Temporary Specification and looking for opportunities to improve the experience of registrants.

Links: [RySG Comment \(3 Aug\)](#)

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### EPDP ON INTERNATIONALIZED DOMAIN NAMES (IDNS EPDP) – REQUEST FOR EARLY INPUT

The RySG welcomed the request for input so early in the process but called attention to existing and potential overlap between the IDN EPDP and other ongoing work and processes and urged for coordination. The RySG stressed that implementation of any outputs should adhere to established contractual and procedural mechanisms. The RySG also strongly supported clear separation of Guidelines (i.e. recommendations, guidance) from contractual obligations.

Links: [RySG Feedback \(10 Nov\)](#)