

Registries Stakeholder Group

Overview of Public Comments 2022

Update December 2022

PUBLIC COMMENTS

1st quarter 2022

ccNSO Proposed Policy on the Retirement of ccTLDs
EPDP Phase 2A Policy Recommendations for ICANN Board Consideration
ICANN Draft FY23-27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget
Additional Unicode Scripts for Support in Internationalized Domain Names
ICANN Bylaws Amendments: ccNSO-Proposed Changes to Article 10 and Annex B
Proposal for Myanmar Script Root Zone Label Generation Rules
Name Collision Analysis Project (NCAP) Study 2 Documents

2nd quarter 2022

Policy Status Report: Uniform Domain Name Dispute Resolution Policy (UDRP)
Root Zone Update Process Study
Root Zone Label Generation Rules Version 5 (RZ-LGR-5)

3rd quarter 2022

Initial Report on the Transfer Policy Review – Phase 1(a)

4th quarter 2022

Universal Acceptance Roadmap for Domain Name Registry and Registrar Systems
Proposed Amendments to the Base RA and RAA to add RDAP Contract Obligations
Pilot Holistic Review Draft Terms of Reference
Proposed Updates to the GNSO Operating Procedures
Draft IANA and PTI FY24 Operating Plan and Budgets
Proposed Amendments to the SLA for the IANA Numbering Services
Registration Data Consensus Policy for gTLDs
Initial Report on the Second CSC Effectiveness Review

OTHER COMMENT OPPORTUNITIES

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PUBLIC COMMENTS

1ST QUARTER 2022

CCNSO PROPOSED POLICY ON THE RETIREMENT OF CCTLDS

The Registries Stakeholder Group (RySG) supports the proposed policy on the retirement of ccTLDs and commends the ccNSO and the ccPDP3 working group for their efforts in this respect.

Links: [RySG Comment \(12 Jan\)](#) – [ICANN Summary Report of Comments \(2 Feb\)](#)

EPDP PHASE 2A POLICY RECOMMENDATIONS FOR ICANN BOARD CONSIDERATION

The RySG re-affirmed its belief that the multi-stakeholder model is at its best when it seeks to enable the contracted parties to comply with laws as it may apply to them individually, across the global legislative landscape. The RySG continues to earnestly support ICANN and its mission, and does urge the Board, especially in light of recent legislative lobbying and activism, that the ICANN community is at its most effective, when we create policy that does not seek to enforce individual laws, by individual nations or collectives, but policy that supports and guides the ability of the contracted parties to ensure their own individual compliance, within a global, predictable, and homogeneous policy framework protecting the core stability and security of the DNS. The RySG provided feedback on the Board's questions.

Links: [RySG Comment \(13 Jan\)](#) - [ICANN org Report of Comments \(27 Jan\)](#)

ICANN DRAFT FY23-27 OPERATING AND FINANCIAL PLAN AND DRAFT FY23 OPERATING PLAN AND BUDGET

The Registries Stakeholder Group (RySG) welcomed the opportunity to comment on the Draft FY23-27 Operating & Financial Plan and Draft FY23 Operating Plan & Budget and appreciated ICANN's effort to provide comprehensive and detailed documentation in a structured way but remains concerned about the ability of the volunteer community to process the huge amount of information, and effectively comment.

The RySG provided overarching comments as well as comments on individual operating initiatives.

Links: [RySG Comment \(7 Feb\)](#) – [ICANN Staff Report on Comments \(30 March\)](#)

ADDITIONAL UNICODE SCRIPTS FOR SUPPORT IN INTERNATIONALIZED DOMAIN NAMES

The RySG provided feedback on the questions and made additional comments about implications of changes to an IDN table impacting existing registration and suggested next steps.

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

ICANN BYLAWS AMENDMENTS: CCNSO-PROPOSED CHANGES TO ARTICLE 10 AND ANNEX B

The RySG supported the amendment and complimented the ccNSO on its effort to enhance its inclusiveness.

Links: [RySG Comment \(1 March\)](#) – [ICANN org Report of Comments \(16 March\)](#)

PROPOSAL FOR MYANMAR SCRIPT ROOT ZONE LABEL GENERATION RULES

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 and appreciates the development and dissemination of additional resources. The RySG again thanked ICANN for developing and disseminating the LGR resources, and reiterated that it is looking forward to further discussions on developing a process for adopting Reference LGRs within the multistakeholder policy development process.

Links: [RySG Comment \(1 March\)](#) – [ICANN org Report of Comments \(22 March\)](#)

NAME COLLISION ANALYSIS PROJECT (NCAP) STUDY 2 DOCUMENTS

The RySG thanked the NCAP Discussion Group for their diligent work. The RySG expressed strong support for the conclusion in the Case Study that the work on name collisions by Interisle and JAS is still relevant today and supports retaining controlled interruption, recognising it is an effective tool for identifying name collisions.

Links: [RySG Comment \(18 March\)](#) – [ICANN org Report of Comments \(4 April\)](#)

2ND QUARTER 2022

POLICY STATUS REPORT: UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY (UDRP)

The Registries Stakeholder Group (RySG) supports the UDRP as a valuable tool for the community and has no further input for the UDRP Status Report.

Links: [RySG Comment \(15 April\)](#) – [ICANN Summary Report of Comments \(10 May\)](#)

ROOT ZONE UPDATE PROCESS STUDY

The RySG welcomes the report and appreciates its thoroughness and care. We find general agreement with the set of recommendations. While we don't disagree with the recommendations we do want to note that not all of them may be necessary and some could have some unintended consequences.

Links: [RySG Comment \(29 April\)](#) - [ICANN org Report of Comments \(16 May\)](#)

ROOT ZONE LABEL GENERATION RULES VERSION 5 (RZ-LGR-5)

The Registries Stakeholder Group (RySG) welcomes the opportunity to comment on this report and thanks ICANN and the Community for the continued work to develop Reference Label Generation Rules (LGRs). The development and dissemination of additional resources is appreciated and 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.

The RySG again thanks ICANN for developing and disseminating these LGR resources. We look forward to further discussions on developing a process for adopting Reference LGRs within the multistakeholder policy development process.

Links: [RySG Comment \(5 May\)](#) - [ICANN org Report of Comments \(23 May\)](#)

3RD QUARTER 2022

INITIAL REPORT ON THE TRANSFER POLICY REVIEW – PHASE 1(A)

The Registries Stakeholder Group (RySG) provided feedback on the draft recommendations and suggested alternative language for recommendations 8 on the Verification of TAC Transfer Authorization Code (TAC) Composition, 13 on a standard time to live (TTL) for the Transfer Authorization Code (TAC), and 18 on the format of Transfer Policy section I.A.3.7.

Links: [RySG Comment \(29 July\)](#) – [ICANN Summary Report of Comments \(30 August\)](#)

4TH QUARTER 2022

UNIVERSAL ACCEPTANCE ROADMAP FOR DOMAIN NAME REGISTRY AND REGISTRAR SYSTEMS

The Registries Stakeholder Group (RySG) expressed appreciation for the the amount of work by ICANN Staff and the consultants involved in developing this Roadmap and in executing the testing effort. The RySG believes, however, that the work would have benefitted from earlier consultation with a broader cross-section of CPH technologists and deeper collaboration between ICANN Staff and the Contracted Party House (CPH) technical experts, especially with regards to reviewing the illustrative registry and registrar architectures that were used to produce this roadmap.

The RySG provided feedback with regard to the unsupported scope expansion to corporate web and email, the assumption of interactions between Registry and Registrant, extending the scope to internal registry interfaces, and other issues.

Links: [RySG Comment \(17 October\)](#) – [ICANN Summary Report of Comments \(14 November\)](#)

PROPOSED AMENDMENTS TO THE BASE RA AND RAA TO ADD RDAP CONTRACT OBLIGATIONS

The Registries Stakeholder Group (RySG) and Registrar Stakeholder Group (RrSG) submitted a joint Contracted Parties House (CPH) comment that recognizes and appreciates the investment of time and resources by all parties to reach a successful conclusion to these negotiations. The CPH expressed the belief that the proposed amendments to the Registry Agreement and Registrar Accreditation Agreement are appropriate and meet the needs of operators and the community.

Links: [RySG Comment \(8 November\)](#) – [ICANN Summary Report of Comments \(16 December\)](#)

PILOT HOLISTIC REVIEW DRAFT TERMS OF REFERENCE

The comment stated that the RySG cannot support the Pilot Holistic Review Terms of Reference until fundamental concerns are first addressed by the ICANN Board and staff. The RySG believes that the proposed approach is anything but clear and does not understand the motivations of the ICANN Board and staff for apparently glossing over important procedural steps for such potentially impactful policy work.

The RySG noted that moving directly to a pilot from a recommendation, with obvious significant open questions, is not transparent, efficient, nor ultimately effective. The RySG recommends a 3-phased process of first clarifying the scope for the review, second agreeing on the approach to a pilot, and third conducting the pilot.

The RySG expressed concern that the current proposal, if pursued without clarification and due process, would be at risk of undermining the transparency and accountability values that should be at the core of ICANN's bottom-up, multi-stakeholder process.

Links: [RySG Comment \(10 November\)](#) – [ICANN Summary Report of Comments \(12 December\)](#)

PROPOSED UPDATES TO THE GNSO OPERATING PROCEDURES

The Registries Stakeholder Group (RySG) supports the GNSO CCOICI review of the WGSA and the amendments to the GNSO Operating Procedures. The RySG is also supportive of increased transparency in the ICANN policymaking process represented by the addition of the Activity Specific SOI to the GNSO Operating Procedures, as we believe increased transparency only serves to strengthen community outputs, and therefore trust, in the multistakeholder model.

Links: [RySG Comment \(14 November\)](#) – [ICANN Summary Report of Comments \(28 November\)](#)

DRAFT IANA AND PTI FY24 OPERATING PLAN AND BUDGETS

Overall, the RySG supports the PTI FY24 Budget and Operating Plan and recognizes and appreciates the hard work by PTI to maintain a constant headcount in the budget. In addition, the RySG notes the following:

The RySG would like to see IANA/PTI examine opportunities for operational efficiency, especially in the area of metrics;

The FY24 plan includes a project related to a "significant re-evaluation and redesign of the iana.org website", which is an effort that could easily involve a challenging operational transition, along with significant time and expense; therefore, the RySG would like to see this effort either better explained and/or deprioritized; and

The biggest year-to-year variance in PTI costs are those related to direct charges for services delivered by ICANN org; therefore, the RySG would like to see greater clarity and transparency regarding these costs.

Links: [RySG Comment \(16 November\)](#) – [ICANN Summary Report of Comments \(28 November\)](#)

PROPOSED AMENDMENTS TO THE SLA FOR THE IANA NUMBERING SERVICES

The RySG provided the following summary and key recommendations for adjustments to the Proposed Amendment:

- 1) Adjust the SLA for the provisioning API (4.3.2(f)d) to be more reasonable given the interface’s relative operational and economic importance; we suggest 98% as a maximum, the standard for gTLD registries which have ICANN-accredited registrars as clients and considerable economic pressure on the registry-registrar interface;
- 2) Phase in the requirements for nameserver geographic distribution and diversity so as to not adversely impact the budget and operational load at PTI.

There are further recommendations contained in the comment’s list of “Material Items” and additional points for review in the list of “Minor Items”.

Links: [RySG Comment \(17 November\)](#) – [ICANN Summary Report of Comments \(13 December\)](#)

REGISTRATION DATA CONSENSUS POLICY FOR GTLDS

The Registries Stakeholder Group (RySG) noted a few areas where slight changes would provide beneficial clarity for those implementing the policy but overall, the RySG is supportive of the policy.

Further, the RySG did not specifically weigh in on each impacted policy in Part II of this comment as several are specific to individual operators, but are generally supportive of the work.

The RySG expressed appreciation for the time and effort put forth by every participant across the community to craft this draft policy and believed that it provides an important baseline for registration data processing that will provide Registry Operators certainty and flexibility.

Links: [RySG Comment \(21 November\)](#) – ICANN Summary Report of Comments (expected 17 January)

INITIAL REPORT ON THE SECOND CSC EFFECTIVENESS REVIEW

The Registries Stakeholder Group (RySG) reviewed the Initial Report and with one major exception and one minor exception, supports its findings and recommendations. The major exception relates to an inconsistency between the Findings and Recommendations related to meeting frequency.

Links: [RySG Comment \(30 November\)](#) – [ICANN Summary Report of Comments \(20 December\)](#)

OTHER COMMENT OPPORTUNITIES

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