Registries Stakeholder Group
Overview of Public Comments
1st quarter 2021

Public Comments

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)

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)

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 (not yet available)

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)

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)

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 (not yet available)

Other Comment Opportunities

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)