

# Registries Stakeholder Group Statement



Issue: **CCT-RT Accepted Recommendations – Plan for Implementation and Next Steps**

Date statement submitted: **21 October 2019**

Reference url: <https://www.icann.org/public-comments/cct-rt-implementation-plan-2019-09-11-en>

## Background<sup>1</sup>

On 1 March 2019 the ICANN Board resolved ([2019.03.01.03](#)) to accept six CCT-RT recommendations: 1, 17, 21, 22, 30 and 31. The [plan for implementation](#) sets out the approach for future implementation of the six CCT-RT recommendations the Board resolved to accept and assembles estimates that are directional for understanding. The [plan](#) provides an overview of implementation activities to be undertaken, where possible, highlights dependencies, and enumerates resources requirements (if any).

The RySG provided substantial comments earlier on in the process on

- CCT-RT Draft Report of Recommendations for New gTLDs (19 May, 2017)  
[https://docs.wixstatic.com/ugd/ec8e4c\\_48249938cc36403dbdfe9582a6657d34.pdf](https://docs.wixstatic.com/ugd/ec8e4c_48249938cc36403dbdfe9582a6657d34.pdf)
- CCT-RT Final Report and Recommendations (11 December, 2018)  
[https://docs.wixstatic.com/ugd/ec8e4c\\_74d02cbc2e04441ba1bd1c29c4d30886.pdf](https://docs.wixstatic.com/ugd/ec8e4c_74d02cbc2e04441ba1bd1c29c4d30886.pdf)

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## Registries Stakeholder Group (RySG) comment:

The Registries Stakeholder Group (RySG) appreciates the opportunity to comment on the “CCT Accepted Recommendations – Plan for Implementation” (“Implementation Plan”) that ICANN Org published on September 11, 2019. The RySG has tracked the efforts of the CCT Review Team (CCT-RT) closely and provided comments on both its draft report, as well as its final report and recommendations.

Links: RySG comment on CCT-RT Draft Report of Recommendations for New gTLDs (19 May, 2017)  
[https://docs.wixstatic.com/ugd/ec8e4c\\_48249938cc36403dbdfe9582a6657d34.pdf](https://docs.wixstatic.com/ugd/ec8e4c_48249938cc36403dbdfe9582a6657d34.pdf);  
RySG comment CCT-RT Final Report and Recommendations (11 December, 2018)  
[https://docs.wixstatic.com/ugd/ec8e4c\\_74d02cbc2e04441ba1bd1c29c4d30886.pdf](https://docs.wixstatic.com/ugd/ec8e4c_74d02cbc2e04441ba1bd1c29c4d30886.pdf).

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<sup>1</sup> *Background*: intended to give a brief context for the comment and to highlight what is most relevant for RO's in the subject document – it is not a summary of the subject document.

## **General Comments**

In our prior comments, the RySG expressed concerns with the overbroad nature of many of the CCT-RT's recommendations, both in terms of how they relate to ICANN's role/remit and the feasibility (including cost) of implementing them. We urged the Board to balance the perceived benefit of certain recommendations such as data gathering and studies against the anticipated costs of fulfilling those recommendations, and we repeat that same urging to ICANN Org when it comes to the implementation plan for the Board-adopted recommendations. To that end, we are somewhat concerned with the statement in the Implementation Plan that ICANN does not intend to provide budget plans until implementation is underway.

## **Comments on Individual Recommendations**

### *Recommendation 1*

The RySG is pleased to see that opportunities for community consultation is built into implementation plan. Regarding the implementation plan itself, we note that it will be very important to properly integrate this project with ICANN's budget and prioritize it appropriately within context of other efforts. Additionally, to reiterate a point raised in our earlier comments, the RySG believes that whatever mechanism that ultimately gets launched should include the ability to evaluate necessity/usefulness of proposed data gathering efforts.

### *Recommendation 17*

The RySG has had concerns about this recommendation as reflected in our previous comments, and therefore supports ICANN not taking further implantation action.

### *Recommendation 21*

The RySG would like to point out that per the CCT-RT Final Report, this recommendation only pertains to sensitive and regulated gTLD strings (see pp. 111 and 112 of the Final Report). This fact is very much lost in the draft Implementation Plan and we urge ICANN to take steps to make the limited scope of this recommendation and subsequent implementation clear.

We note that the Implementation Plan includes a phase where ICANN Org will consult with relevant community members about whether or not to publish the gTLDs that are targets of abuse. In addition to this, the RySG encourages ICANN to also discuss with stakeholders the suggestion of publishing the resolution stats of complaints, particularly how such information would be communicated in reports. The "resolution status" can be a complex and nuanced – not to mention evolving – matter depending on the type and validity of the complaint submitted, and so careful thought should be given to how to convey this information publicly.

### *Recommendation 22*

Again, we note that this recommendation only pertains to sensitive and regulated gTLD strings, per p. 113 of the Final Report. As with Recommendation 21, the Implementation Plan must make that very clear. The distinction is particularly important for this

recommendation because, when considered out of context, the phrase “offering of services” could be taken to mean the offering of services within the domain names of the TLD as a whole. This would be wildly inappropriate as it would require all ROs to police the content and actions of registrants within their TLDs.

In addition to that point, we also suggest that because the universe of stakeholders here is somewhat narrow, the milestones listed in the Implementation Plan can likely be met much more quickly than estimated in the draft document.

*Recommendation 30*

For this recommendation, the Implementation Plan should also include a review of previous outreach and communications efforts to assess their overall effectiveness and which tactics worked and did not. This exercise will likely be very informative in the development of future outreach plans. The Plan should also acknowledge the possibility that increased applications from the Global South may not end up being an objective for future gTLD application rounds, and include a contingency for such a result.

*Recommendation 31*

The RySG recognizes that this recommendation is contingent on the outcome of the SubPro PDP and as such we have no specific comments at this time.

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