

October 27, 2016

ITEMS International  
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France

Via email to: [TMACKENZIE@ITEMS.FR](mailto:TMACKENZIE@ITEMS.FR)

Re: Review of ICANN At-Large Community (ALAC); 2016-2017

Dear Tom:

The Registries Stakeholder Group (RySG) represents the interests of generic Top-Level Domain name (gTLD) registry operators that are currently under contract with ICANN to provide registry services in support of one or more gTLDs. Likewise, the Registrar Stakeholder Group (RrSG) represents the interests of entities under contract with ICANN to provide gTLD registration services to domain name registrants. Although many of our individual members have completed ITEMS' online survey on the effectiveness of the ALAC and its leadership, we write this letter to provide more specific input and suggestions on ways the ALAC may be improved. We would greatly appreciate you incorporating this feedback and our recommendations into ITEMS' review and subsequent report to ICANN.

First, with respect to ALAC's structure, we believe that their organizational structure is overly complicated and makes it difficult for this group to be truly representative of the views of typical Internet users. Despite the multiplicity of Regional At-Large Organizations (RALOs) that make up the At-Large structure, leaders elected for the At-Large Advisory Committee are almost the same group of individuals year after year. The diverse and seemingly disjointed nature of the RALOs appears to make it difficult for new members to become active and visible in the ALAC, and consequently, the same officers are re-elected cycle after cycle.

Further, RALO processes appear to dis-incentivize direct participation by individuals and uphold this seemingly narrow, unrepresentative leadership structure. In all but two cases, RALOs do not allow direct participation by individuals in ICANN work; this means that, in most cases, it is easier for an individual Internet user to participate in ICANN through the Generic Names Supporting Organization (GNSO) Policy Development Process than through the ALAC. The result is that the ALAC's views reflected within the ICANN community are the views of a handful of individuals and not, truly, of the Internet users at large. We think a mechanism should be created where Internet users are encouraged to participate directly in ICANN's policy development and public comment processes.

Second, rather than attempting to be a unitary “voice” of the Internet user, the ALAC should create meaningful education programs and consumer awareness campaigns to inform users about domain names as the chief navigational tool for the Internet. ALAC should encourage users to directly participate in other ICANN processes and embark on user-focused research projects that will help inform other ICANN-decision making processes.

Third, ICANN funds travel, food, and accommodations for dozens of ALAC members each and every ICANN meeting. Based on ICANN’s released figures (which we note appear to be an underestimation due to the funding for some ALAC members appearing to come from other budgets), at least \$3.47 million has been allocated to travel support to ICANN meetings for the ALAC between ICANN 33 and ICANN 56. This figure does not take into account other costs in supporting the ALAC structures and operations outside of the ICANN meetings. Although the RySG and RrSG do believe ALAC member attendance at ICANN meetings is important, in view of this very substantial financial support we consider that any reasonable review of the ALAC must include a cost-benefit analysis of its operations and effectiveness. Consideration also should be given to whether some of this funding could be put to more effective use on research of issues clearly within ICANN’s remit.

Finally, we suggest that ALAC members work more closely with other Stakeholder Groups within the ICANN community, particularly with registries and registrars, who they often accuse of not adhering to their contractual commitments. Rather than offer constructive suggestions regarding consumer protections and interactions, the ALAC too often employs a challenging “us versus them” mentality when it comes to debate which makes them less effective at devising solutions to address identified problems.

We thank ITEMS for its work to review the ALAC organization and membership and look forward to seeing the results of the survey and any recommendations made.

Should you have any questions or wish to meet with me or any members of the RySG or the RrSG, please do not hesitate to contact either of us.

Sincerely,

Paul Diaz  
Chair  
Registries Stakeholder Group

Graeme Bunton  
Chair  
Registrar Stakeholder Group