



Registries Stakeholder Group

Overview of Comments

2020

Overview

Comment periods closing in 2020 January - December: **34***
RySG comments submitted in 2020 January - December: **20**

(* this includes 2 proposed RA renewals, on which the RySG does not comment)

Public Comments

- Third Accountability and Transparency Review Team (ATRT3) Draft Report
- Draft FY21-25 Operating & Financial Plan and Draft FY21 Operating Plan & Budget
- Evolving ICANN's Multistakeholder Model Work Plan
- Second Security, Stability, and Resiliency (SSR2) Review Team Draft Report
- Draft Proposal for NextGen@ICANN Program Improvements
- Initial Report of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Team – PHASE 2
- Phase 1 Initial Report of the Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process
- Addendum to the Initial Report of the EPDP On the Temporary Specification for gTLD Registration Data Team - Phase 2
- Guidelines for Developing Reference Label Generation Rules (LGRs) for the Second Level Version 2
- Draft PTI FY21-24 Strategic Plan
- ccNSO PDP3: Initial Proposals for Process to Retire ccTLDs
- Enhancing the Effectiveness of ICANN's Multistakeholder Model – Next Steps
- Third Accountability and Transparency Review Team (ATRT3) Final Report
- GNSO New gTLD Subsequent Procedures Draft Final Report
- GNSO New gTLD Subsequent Procedures Draft Final Report
- Reference Label Generation Rulesets (LGRs) for the Second Level
- Recommendations for Early Warning for Root Zone Scaling
- DRAFT PTI and IANA FY22 Operating Plan and Budgets
- IANA Naming Function Review (IFR) Initial Report
- Recommendations for ICANN's Root Name Service Strategy and Implementation

Other Comment Opportunities

- Operational Design Phase Concept Paper

Public Comments

Third Accountability and Transparency Review Team (ATRT3) Draft Report

- The RySG provided feedback on the different Recommendations and Suggestions in the ATRT3 Draft Report. The RySG made suggestions to simplify the report, better track work across reviews, and make recommendations more specific and easier to prioritize, for example, by indicating the path between new ATRT3 and related recommendations from ATRT1/ATRT2, providing context on how survey input led to certain recommendations, and including measurable metrics. The RySG called for a standard format for review reports.
- Links: [RySG Comment \(31 Jan\)](#) - [ICANN Staff Report on Comments \(14 Feb\)](#)

Draft FY21-25 Operating & Financial Plan and Draft FY21 Operating Plan & Budget

- The RySG provided overarching comments on the budget document and process, listed different issues that would benefit from further clarification and detail, and focused on individual projects and budget items of concern to the RySG.
- Links: [RySG Comment \(25 Feb\)](#) – [ICANN Staff Report on Comments \(27 March\)](#)

Evolving ICANN’s Multistakeholder Model Work Plan

- The RySG expressed some disappointment with the final product of the Evolving the Multistakeholder Model project that is light on substance and offers little guidance beyond suggesting which community group should take lead on developing solutions. The RySG asked that community efforts already addressing issues described in the Work Plan be allowed to run their proper course before the ICANN community takes on additional work, most notably the GNSO’s PDP 3.0 and Third Accountability and Transparency Review (ATRT3).
- Links: [RySG Comment \(25 Feb\)](#) – [ICANN Staff Report on Comments \(27 March\)](#)

Second Security, Stability, and Resiliency (SSR2) Review Team Draft Report

- The RySG did not support the conclusions on next steps, in particular, recommendations for unilateral contract amendments, or pre-determined outcomes of studies or policy work, as they are outside the scope of the SSR2’s work. The RySG urged the Review Team to refrain from creating its own definitions, in particular definitions of “security threat” and “DNS abuse” in Appendix A of the report. The RySG asked the Review Team to clarify the rationale behind the decision to duplicate the recommendations from a previous Review Team and noted that recommendations would benefit from an explicit statement of the problem they intend to address. The RySG advised to bundle recommendations that are related or form a package and improve prioritization. The RySG provided feedback on the individual SSR2 recommendations.
- Links: [RySG Comment \(20 March\)](#) – [ICANN Staff Report on Comments \(22 April\)](#)

Draft Proposal for NextGen@ICANN Program Improvements

- The RySG provided feedback the proposed improvements to the NextGen@ICANN Program. The RySG acknowledged the program's potential to contribute to improving global awareness and understanding of ICANN's role and to increasing support for the ICANN multistakeholder model, and prompts to look for synergies and ways to better coordinate with ICANN initiatives focused on increasing participation, such as the Fellowship Program.
- Links: [RySG Comment \(31 March\)](#) – [ICANN Staff Report on Comments \(14 April\)](#)

Initial Report of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Team – PHASE 2

- The Initial Report outlines the core issues discussed in relation to the proposed System for Standardized Access/Disclosure to non-public gTLD registration data ("SSAD") and accompanying preliminary recommendations. The RySG provided feedback on the 19 Recommendations in the Initial Report.
- Links: [RySG Comment \(14 April\)](#) - [ICANN Staff Report on Comments \(12 May\)](#)

Phase 1 Initial Report of the Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process

- Per the PDP Working Group's Charter, its Phase 1 work focuses on reviewing all the RPMs and associated structures and procedures applicable to gTLDs launched under the 2012 New gTLD Program, specifically, the Uniform Rapid Suspension System (URS), the Trademark Clearinghouse (TMCH), the Sunrise Periods and Trademark Claims Service provided by the TMCH, and the Trademark Post-Delegation Dispute Resolution Procedure (TM-PDDRP). The RySG comment provided feedback on the recommendations, proposals and questions in the Initial report.
- Links: [RySG Comment \(4 May\)](#) – [ICANN Staff Report on Comments \(18 May\)](#)

Addendum to the Initial Report of the EPDP On the Temporary Specification for gTLD Registration Data Team - Phase 2

- The addendum to the initial Report contains the EPDP Team's preliminary recommendations and/or conclusions on priority 2 items: Display of information of affiliated vs. accredited privacy / proxy providers; Legal vs. natural persons; City field redaction; Data retention; Potential Purpose for ICANN's Office of the Chief Technology Officer; Feasibility of unique contacts to have a uniform anonymized email address; Accuracy and WHOIS Accuracy Reporting System; Purpose 2.
- Links: [RySG Comment \(5 May\)](#) – [ICANN Staff Report on Comments \(21 May\)](#)

Guidelines for Developing Reference Label Generation Rules (LGRs) for the Second Level Version 2

- The Guidelines describe the process to be followed in developing a set of reference label generation rulesets (LGRs) to be made available for selected languages and scripts on the

second level. The the RySG welcomed these good practices and looks forward to working with ICANN and the community to develop a process for adopting the anticipated reference LGRs within the multi- stakeholder, consensus process.

- Links: [RySG Comment \(12 May\)](#) – [ICANN Staff Report on Comments \(26 May\)](#)

Draft PTI FY21-24 Strategic Plan

- The Strategic Plan - PTI's first Strategic Plan - defines PTI's FY21-24 strategy in delivering the IANA functions and represents a subset of the ICANN organization's strategy. The RySG comment suggested including more details on the information and analysis that were used as foundation to develop the plan, to better articulate how the plan will be translated into and Operating Plan, and to align PIT's and ICANN's planning cycles.
- Links: [RySG Comment \(1 June\)](#) – [ICANN Staff Report on Comments \(16 June\)](#)

ccNSO PDP3: Initial Proposals for Process to Retire ccTLDs

- The RySG supported the proposed approaches and definitions, but suggested that in the policy is made clear that it is not applicable retrospectively and does not apply to non-ccNSO members but can be a good model for non-members.
- Links: [RySG Comment \(8 July\)](#) – [ICANN Staff Report on Comments \(31 July\)](#)

Enhancing the Effectiveness of ICANN's Multistakeholder Model – Next Steps

- The RySG provided feedback on the proposed Work Plan, the precision of scoping the work, and issues related to consensus, representation and inclusivity, asked that all ongoing work, including GNSO PDPs and IRTs, should be included when prioritizing community work, and to better focus on how to close work efforts or putting them on hold. The RySG encouraged ICANN to clarify how progress/success of the project will be evaluated.
- Links: [RySG Comment \(31 July\)](#) - [ICANN Staff Report on Comments \(17 Aug/updated 3Sept\)](#)

Third Accountability and Transparency Review Team (ATRT3) Final Report

- Referring to its substantive [comments](#) on the ATRT3 Draft Report, the RySG provided comments on the ATRT3 Final Report that is presented for consideration by the ICANN Board.
- Links: [RySG Comment \(31 July\)](#) – [ICANN Staff Report on Comments \(31 Aug\)](#)

GNSO New gTLD Subsequent Procedures Draft Final Report

- The RySG provided feedback on the SubPro Draft Final Report, indicated via the online form support for, or objection against the different SubPro outputs, or suggested additional elements for consideration.
- Links: [RySG Comment \(30 Sept\)](#) – [ICANN Staff Report on Comments \(21 Oct\)](#)

GNSO New gTLD Subsequent Procedures Draft Final Report

- The RySG provided feedback on the 41 Topics in the Draft Final Report of the New gTLD Subsequent Procedures (SubPro). While supportive of most outputs, the RySG provided additional comments on certain topics, such as applicant support, application fees and metrics and monitoring, and expressed concerns about the text on string similarity evaluations, and, more concrete, single/plural variations of the same string and the concept of ‘intended use’.
- Links: [RySG Comment \(30 Sept\)](#) – [ICANN Staff Report on Comments \(21 Oct\)](#)

Reference Label Generation Rulesets (LGRs) for the Second Level

- The RySG voiced concern about the proposed Reference Label Generation Rulesets (LGRs) and stressed that IDN policies should be simple and scalable, focus on the most egregious risks, and be developed in accordance with contractual and consensus policies.
- Links: [RySG Comment \(14 Oct\)](#) - [ICANN Staff Report on Comments \(5 Nov\)](#)

Recommendations for Early Warning for Root Zone Scaling

- The RySG did not object to the recommend approach, but noted that it may invite subjective determinations based on intangible factors, and reminded that absent extraordinary emergency circumstances ICANN community input should be asked before action is taken.
- Links: [RySG Comment \(23 Nov\)](#) – [ICANN Staff Report on Comments \(4 Dec\)](#)

DRAFT PTI and IANA FY22 Operating Plan and Budgets

- The RySG welcomed the fiscal prudence for the FY22 budget, invited further explanation or details on the underspend in FY2020, the choices and compromises being made, IANA’s investment needs, and suggested including a statement on risks or issues arising from the COVID-19 pandemic and their prospective impact on the budget.
- Links: [RySG Comment \(30 Nov\)](#) – ICANN Staff Report on Comments (not yet available)

IANA Naming Function Review (IFR) Initial Report

- The RySG supported the recommendations and expects that they will increase transparency and improve efficiencies going forward
- Links: [RySG Comment \(2 Dec\)](#) – ICANN Staff Report on Comments (not yet available)

Recommendations for ICANN’s Root Name Service Strategy and Implementation

- The RySG comment expressed support for the recommendations.
- Links: [RySG Comment \(8 Dec\)](#) – ICANN Staff Report on Comments (not yet available)

Other Comment Opportunities

Operational Design Phase Concept Paper

- The RySG provided feedback on the Operational Design Phase Concept Paper and noted potential benefit, risk and the need for additional guardrails to ensure an ODP delivers on its promise while avoiding the potential for re-litigating policy issues, circumvention of the PDP process and the introduction of further complexity and delays in already complex procedures.
- Links: [RySG Feedback \(20 Nov\)](#)