June 17, 2014

Dr. Steve Crocker, Chairman of the Board
Mr. Fadi Chehadé, President & CEO
Internet Corporation of Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, California 90094
USA

Re: ccNSO Comments on ICANN Public Consultation Process

Dear Steve and Fadi,

On 6 May 2014 ICANN announced a *twenty-one day* "opportunity for public dialogue and community input" on ICANN accountability. While the ccNSO Council has provided comments on this matter, I am writing to express serious concern about the manner in which ICANN appears to be driving this process: by setting a twenty-one day deadline, ICANN has made it virtually impossible for the ccTLD *community* to articulate a *consensus view* on an extremely important issue.

As part of the 6 May announcement, ICANN proposed creation of a working group including the composition of that group, catalogued – and characterized - ICANN's existing accountability mechanisms, and defined the "mandate" of the proposed working group. As the first step in a multistakeholder process, ICANN should be coming to the table with an *open mind*, seeking thoughtful input on all of those items. Is a working group the right approach? Who should be on the working group? Can an "AoC" approach scale, and is it enough to enhance "existing mechanisms" or should new mechanisms be considered? Who should decide what subject matter expertise is needed, and how should required experts be selected?
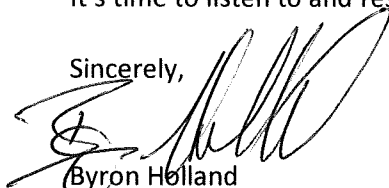
A twenty-one day comment period is hard to reconcile with meaningful community participation in an important bottom-up process. It is not respectful of the rules and processes that ICANN supporting organizations rely on to develop and express thoughtful consensus views on important issues. And it is hard to believe that ICANN has an open mind or is seriously interested in "dialogue" – let alone a true multistakeholder process when the ccNSO Council has *already been asked* to identify ccNSO representatives for the proposed working group.

The NTIA announcement calls on ICANN to convene a multistakeholder process – not to drive the community relentlessly to a predetermined outcome. As the strong and uniformly negative response to ICANN's transition proposal and scoping document for the IANA transition demonstrates, ICANN does not appear to be listening to the community's call a genuine multistakeholder process.

We therefore strongly urge ICANN (again) to improve scoping, planning and scheduling of this and other processes, including the related public consultations. We note that important processes, such as the Strategic Planning Process, consultation by the Strategic Panels, IANA Stewardship Transition Process and this process are staggered. We also note that without due advance notice public consultations are announced, sometimes changed and/or their duration is very limited. For example the comment period for this process was extended on 30 May, 3 days after the originally envisioned closure. As a result the ability of the ccNSO Council, ccNSO membership and the ccTLD community at large to provide timely, considered and coordinated feed-back and input to this and the other aforementioned, related processes is frustrated. It is the belief of the ccNSO Council that this ability is at the heart of the multi-stakeholder model, and as it is frustrated, the model itself is undermined.

It's time to listen to and respect the stakeholder community.

Sincerely,

Byron Holland
ccNSO Chair