

Comments on ICANN's draft 2010 – 2013 Strategic Plan

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.au Domain Administration Ltd (auDA) is the not-for-profit organisation endorsed by the Australian Government to administer the .au domain space under an industry self-regulatory regime. auDA is a long-standing, active participant in ICANN's country code Names Supporting Organization (ccNSO).

auDA welcomes the opportunity to comment upon ICANN's draft Strategic Plan for 2010 – 2013.

General Points

- auDA agrees with the four key work areas identified by ICANN in its draft strategic plan.
- However, the current iteration of the plan lacks detail and performance metrics. This prevents stakeholders from providing meaningful commentary and from understanding exactly how ICANN will be accountable to its community over the next four years.
- While ICANN's high-level Strategic Plan should not be a document that goes into full operational detail, the current document does not provide enough information to link broad, amorphous objectives such as "one unified, global Internet" and the specific strategic projects that will be undertaking to achieve these goals.
- auDA acknowledges that additional staff detail will be added to the "final" plan and welcomes the opportunity to join other stakeholders in commenting on this detail in the near future.

Priority 1: Preserve DNS stability and security

auDA welcomes ICANN's appropriate recognition of security, stability and resiliency as a key priority for 2010-2013. auDA particularly welcomes ICANN's willingness to support the work of ccTLD operators and calls on ICANN to adhere to this commitment, building upon its broad strategic target by developing a detailed suite of activities and projects for the next four years.

auDA notes that, while security and stability is clearly of utmost importance to ICANN and the community, only approximately 10% of ICANN's budget is explicitly devoted to this priority. auDA invites ICANN to consider whether this reflects an appropriate alignment of strategic priorities and allocation of funds.

Priority 2: Promote competition, trust, choice and innovation

ICANN and its constituencies face an unprecedented period of change to the DNS. The impending introduction of IDNs, new gTLDs, DNSSEC and the transition from IPv4 to IPv6 raise a number of risks, challenges, and policy and technical issues.

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As ICANN moves from planning the introduction of IDNs, gTLDs, DNSSEC and IPv6 to implementation and management, auDA believes it is important for the organisation to do everything it can to ensure the ongoing success of all of these initiatives and the stable and secure operation of the Internet.

Specifically, to ensure a “level playing field” and to meet its stated objective of “everyone connected”¹, ICANN should:

- Continue and expand outreach activities to ensure maximum levels of awareness, leveraging existing stakeholder relationships (particularly ccTLD managers);
- exercise considerable flexibility with the imposition of financial obligations upon new (particularly not-for-profit) IDN and new gTLD registries; and
- provide resources and opportunities for those that undertake the challenging tasks of registering an IDN or new gTLD, implementing DNSSEC or moving to IPv6 to exchange experiences, challenges and best practices.

Priority 3: Excel in IANA and other core operations

Excellence in core operations is one area where ICANN’s Strategic Plan and the priorities of ccTLD managers are in close alignment. There is little doubt that the operation and management of the IANA function is of critical importance to ccTLDs and is part of the everyday, fundamental expectations ccTLDs have of ICANN.

However, ICANN should be cautious in its use vague terms such as “excel” and “flawless IANA operations” – they mean little unless they are qualified and supported by enforceable performance indicators. ICANN should monitor the needs and expectations of ccTLD managers with regards to IANA and other core functions and consult closely with ccTLDs to meet these needs.

Priority 4: Contribute to shaping a healthy internet eco-system

Improved stakeholder engagement

In its draft Strategic Plan, ICANN has included the need to strengthen the multi-stakeholder model under the broad heading of “Contributing to shaping a healthy Internet eco-system”. Specifically, ICANN aims for all stakeholders to “have a voice at the table”.

¹ ICANN Draft Strategic Plan 2010-2013, pp.3.

However, the current draft does not provide a clear explanation of exactly how ICANN aims to achieve this, nor does it define its “multi-stakeholder model”, identifying the full range of stakeholder groups and how they inter-relate.

ICANN’s commitments to projects including community reviews, impact reporting, and participation in Internet Governance discussions are appropriate, but must be expanded upon in subsequent iterations of the Strategic Plan. Specifically, what community reviews is ICANN planning? What impacts will they have on a community that is already heavily engaged in numerous reviews? What metrics will ICANN use and how will they be enforced?

Improved accountability and transparency

ICANN’s accountability to its stakeholders has always been – and remains - a key priority for ccTLD managers. The goal of improved transparency and accountability is critical - it was a key pillar of the move away from ICANN’s MoU/JPA arrangement with the US Department of Commerce and is addressed at length in ICANN’s By-Laws and the Affirmation of Commitments that superseded previous governance arrangements.

However, despite all of these responsibilities, the ICANN Board suffers under very few solid, enforceable, measurable commitments to its constituents and the broader Internet community. auDA acknowledges the efforts ICANN has made in this area, but ICANN must single-mindedly continue the promotion and delivery of true accountability, in order to maintain the trust and support of the community. Enshrining some “hard” enforcement mechanisms such as mandatory, external, independent audits of performance against Key Performance Indicators and the introduction of By-Law changes relating to Board accountability should be part of this effort.

Given the breadth of ICANN’s commitments and responsibilities relating to accountability, it would be far too easy for the organisation to fall into the trap of an endless, meaningless review cycle that achieves little and confuses, distracts and exhausts stakeholders. It is important for the organisation to maintain a consistent, clear, approach to how it will deliver true accountability, instead of fracturing, dividing, or stopping and starting improvement efforts. This necessarily includes delivering some certainty on the future of the President’s Strategy Committee, given the considerable time and effort the PSC has already committed to Improving Institutional Confidence.

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