Country Code Names Supporting Organization comments on:

ICANN consultation on the IANA customer service complaint resolution process

February 2013

The ccNSO Council welcomes the opportunity to comment on ICANN's consultation on the IANA customer service complaint resolution process. Given the limitations imposed by the timelines for this consultation, these comments have been considered by the ccNSO Council, though do not necessarily represent the consensus view of all ccNSO members, some of whom may decide to submit their own comments.

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Chair of the ccNSO

The ccNSO Council notes that this consultation is part of a series of efforts from ICANN to establish performance standards for the delivery of the IANA functions, as required by the contract between ICANN and the NTIA.

ccTLDs represent a significant and active proportion of IANA's stakeholder community, specifically in relation to IANA's role in the maintenance of the DNS root zone. The stable, reliable, accurate and effective execution of the IANA functions is of utmost importance to ccTLD managers and, to use the terminology of the current consultation, ccTLDs will often be the "customers" for who improved complaint resolution processes are being developed.

Therefore, the ccNSO Council welcomes both the concept of formalising IANA performance metrics and the open, collaborative and consultative processes through which they are being developed.

In the most general sense, the ccNSO Council recognises the utility in adopting the existing "IANA-related Issue Escalation Procedure" as a means of fulfilling current contractual requirements relating to customer complaint resolution.

However, there is a significant difference between expediently adapting an existing procedure to meet obligations and ensuring that the best possible outcome is derived.

The current procedure was developed in consultation with the community and provides a series of clear steps through which issues can be escalated. However, it was developed in 2006 and should be carefully scrutinised before formal re-adoption to ensure that, as required by the IANA functions contract, "industry best practice" is followed.

The ccNSO Council welcomes the updates proposed by ICANN with regard to making the process easier to follow, but poses the following questions and comments with the aim of contributing to the best possible outcome for all stakeholders.

Awareness and understanding

- How actively is the "IANA-related Issue Escalation Procedure" promoted to relevant stakeholders?
- Can ICANN make a reasonable estimation of the current level of "customer awareness"?
- Irrespective of the above figures, it is desirable to strive for greater awareness and promotion of an updated Customer Service Complaint Resolution Procedure. This includes:
    - guidance in various languages
    - active promotion at the time a request is received and email ticket issued (not only on the IANA website or when an escalation is requested) and
    - ongoing, proactive support for those lodging a complaint about the process, the progress of their complaint, and subsequent steps in the process.

Stakeholder satisfaction

- Has ICANN undertaken an analysis of how often the current issue escalation procedure has been used?
- Have requestors been afforded the opportunity to provide their feedback during and at the conclusion of each escalation process?
- If so, what percentage of issues were resolved to the requestors' satisfaction?
- These baseline questions provide important guidance regarding both the uptake and effectiveness of the current process. This data could also provide important guidance regarding where improvements could be made, and should be factored into the current consultation process.

Stakeholder responsibilities

- Although the current procedure outlines clear steps of escalation, the emphasis at each stage is placed upon the requestor. For example, the onus is upon the requestor to lodge an escalation request, contact the designated ICANN functional liaison or program manager, ICANN President and CEO, and/or the Ombudsman.
- Care should be taken to ensure that the complaint process avoids becoming adversarial in nature and entirely driven by the determination, or level of dissatisfaction, of the requestor.
- It is particularly important that cultural sensitivities and/or language difficulties be considered and accommodated in the development of a revised complaints process.
- Above all, the process should operate as a genuine, collaborative mechanism for resolving concerns and complaints. It should be perceived and presented by ICANN as a "customer

service" initiative – and not as a complex contractual obligation upon ICANN that stakeholders must navigate alone.

Reporting

- As with all ICANN procedures and processes, it is critical that, to the greatest extent possible, statistics and reports are published to allow the community (and NTIA) to assess and comment upon ICANN's performance.
- Such a process should respect the privacy of requestors, while providing regular information regarding:
    - the number of current complaints received,
    - the number of currently unresolved complaints,
    - the level to which complaints have been escalated, and
    - aggregate complaint figures over time.

Note on transfer / re-delegation requests

- The ccNSO Council recognises that ICANN is currently undertaking a separate consultation[1] on delegation and re-delegation performance standards – and intends to provide a distinct set of comments in response to that consultation.
- Transfer or re-delegation requests are often complex and require far greater timeframes for resolution. Therefore, it may be impractical to apply the rigid, tight timeframes proposed for within this consultation to the remediation of such requests (escalated or otherwise).
- Transfer or re-delegation requests are also usually initiated by parties that do not have an existing relationship with ICANN/IANA (either contractual or informal). That is, parties that are not existing "customers".
- Therefore, the ccNSO Council would like to highlight the importance for ICANN/IANA to be very clear as to how it intends for complaints resolution processes to relate to transfer/re-delegation requests, if at all.

[1] http://www.icann.org/en/news/public-comment/cctld-drd-15jan13-en.htm