Public Comment Data Analysis

January 2010 to December 2017

Policy Development Support Department
9 May 2018

ICANN

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Public Comment Data Analysis

1   Executive Summary

This report represents the fifth in a succession of Public Comment analyses that began formally in May 2013 studying the period 2010-2012. For those readers interested in the history of Public Comment analyses, Appendix A: Background and Overview, explains the origin of these analyses, including links to previous reports, and their relationships to Accountability Transparency Review Team (ATRT) recommendations and implementations.

Although the original purpose of studying Public Comment proceedings was to understand the impacts of specific improvements implemented (e.g., ATRT1, ATRT2) at various points in time, this iteration represents a more generic assessment of overall trends and patterns occurring throughout the seven-year period (2010-2017) and does not focus on specific improvement initiatives previously vetted.

KEY SUMMARY FINDINGS AND CONCLUSIONS

Following are key observations that are more fully elaborated in Section 4: Overall Findings, Conclusions, and Recommendations.

- ⊙ **Total Number of Public Comment Proceedings.** The total number of Public Comment proceedings has declined approximately 10%. It is not clear from the data itself why this decline in activity has occurred nor is there any reason to conclude that this trend will continue into 2018 and beyond.
- ⊙ **Quantity by Department.** There has been a shift in recent years as to which ICANN Organization Departments publish the highest quantity of Public Comment topics. The Policy Development Support Department (Policy) dominated that position from 2010-2013; however, the Global Domains Division (GDD) has become the leading department during the past four years.
- ⊙ **Translations.** The percentage of proceedings translated into languages other than English had fallen from a high of nearly 50% in 2010 to just under 10% in 2013, However, in the years 2015 and 2016, there had been a marked turnaround ascending to ~20%, but 2017 shows a return to 10%.
- ⊙ **Length of Public Comment Proceedings.** The length of time (days) Public Comment proceedings remain open for comment increased from 42-44 days in 2010-2011 to 50-52 days throughout the past six years. During the past three years (2015-2017), 93% of all Public Comment proceedings have been open for at least 40 days – a minimum default period established in January 2015.
- ⊙ **Most Popular Proceeding Topics.** During the years 2010-2017, 70% of the most popular Public Comment topics were related to the New gTLD program.
- ⊙ **Least Popular Proceeding Topics.** The percentage of proceedings experiencing zero comments from the ICANN community has decreased markedly since 2010-2014. In 2015 and 2017, every proceeding received comments and, in 2016, only 2% had no comments submitted.
- ⊙ **Number of Submissions.** In terms of participation levels, during the eight-year period from 2010-2017, the median number of comments per proceeding has been relatively stable between 5-7.

YEAR SUMMARY: 2017

The following table provides a quick summary of the key data fields captured for the most recent calendar year (2017). In later report sections, this data will be compared to and contrasted with previous years in various tables, charts, and graphs.

Owner	Proceedings	Average Length	Total Comments	Translations
Policy	10	50	129	2
Strategic	6	54	81	1
GDD	17	53	117	
Legal	1	41	5	
Finance	3	50	35	
Technical	1	56	13	
Engagement	2	50	14	1
HR	1	67	14	
Grand Total	41	52	408	4

A NOTE ABOUT DATA COLLECTION

The data collection process involves harvesting information from each of the Public Comment pages archived on icann.org and building an Excel workbook for subsequent analysis. Once the data is available in spreadsheet form, various statistical calculations and other summarizations are prepared along with graphs/charts highlighting trends and patterns. Sections 2 and 3 of this report present various findings that may be useful as input to those who will continue working toward improving the Public Comment function within ICANN Organization. Section 4 summarizes findings that can be gleaned from the various data analyses.

2   Findings Related to Public Comment Proceedings

There were 458 Public Comment proceedings (Jan 2010-Dec 2017) included as part of this data analysis. This section summarizes those findings related to the proceedings themselves; whereas, Section 3 will report statistics related to the comments submitted.

2.1   Proceedings Published

Chart 2.1 below shows the number of proceedings by year (using Close Date) during the eight-year horizon. Although there is a downward trajectory (~ -9.9% CAGR[1]) in the number of proceedings per year, there is no evidence to suggest that it is symptomatic of anything other than the normal ebb and flow of work confronting ICANN. On a quarterly basis, the number of proceedings has declined from a high of 19 in 2010 to just under 11 in 2017.

Chart 2.1
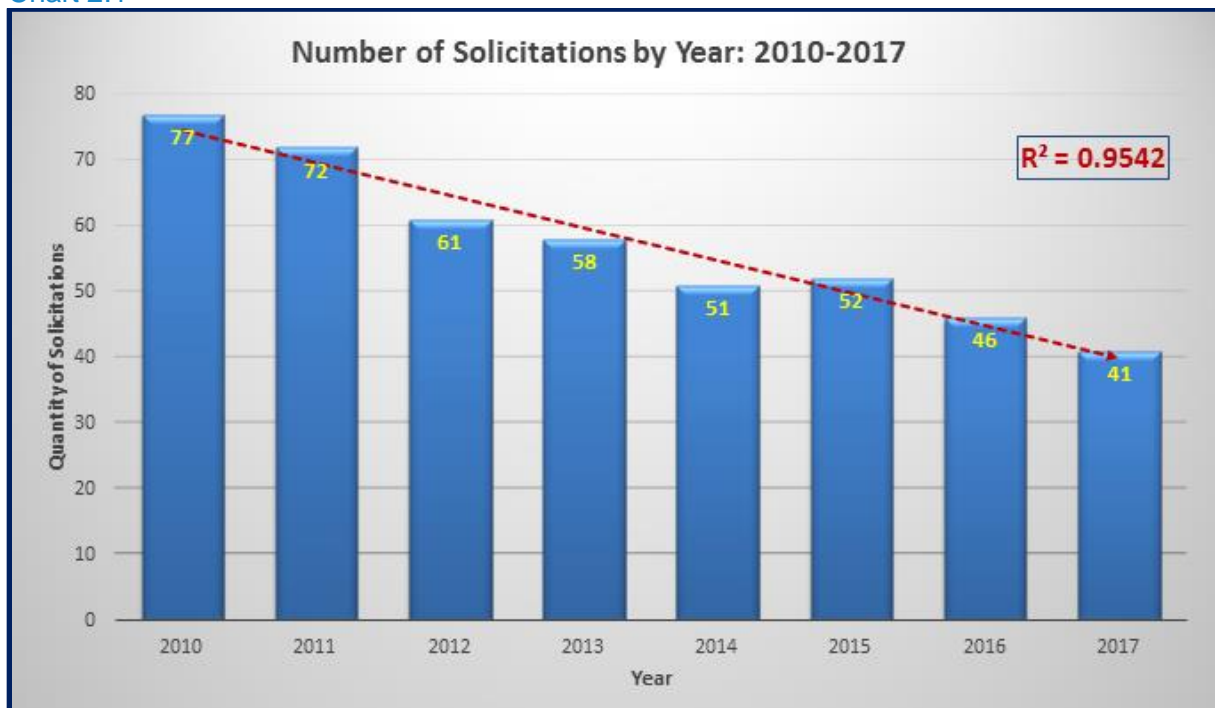
One way to help understand the decline in overall volumes is to examine the number of proceedings by ICANN Organization Department. The next Charts 2.2 shows that the two largest overall contributing departments to ICANN Public Comment proceedings are Policy and GDD which, together, make up 69% of the total volume of proceedings from 2010-2017.

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[1] CAGR = Compound Annual Growth Rate which, in this instance, is negative.

Chart 2.2
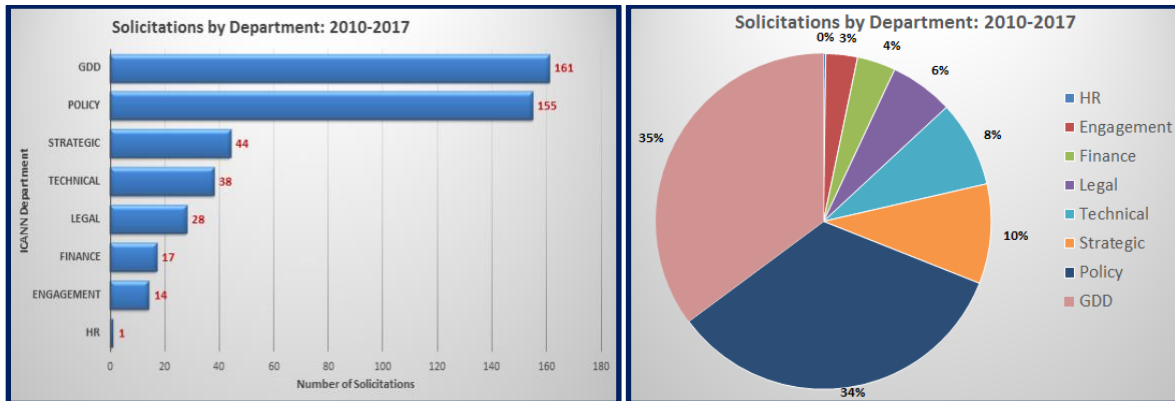
In Chart 2.3, looking more closely at Policy and GDD, it can be seen that GDD experienced a peak in 2010 followed by a drop to 15-17/year in 2011-2013. GDD's volumes then increased to 22-23 in years 2014-2016, with a decrease in 2017. Policy's peak occurred in 2011 and has witnessed steadily decreasing volumes in nearly all succeeding years. Policy's volume in 2017 (10) is 75% lower than the number of proceedings closed in 2011 (39). All other departments' volumes have relatively stable except for a noticeable drop in proceedings posted by the Strategic team in 2016.

Chart 2.3
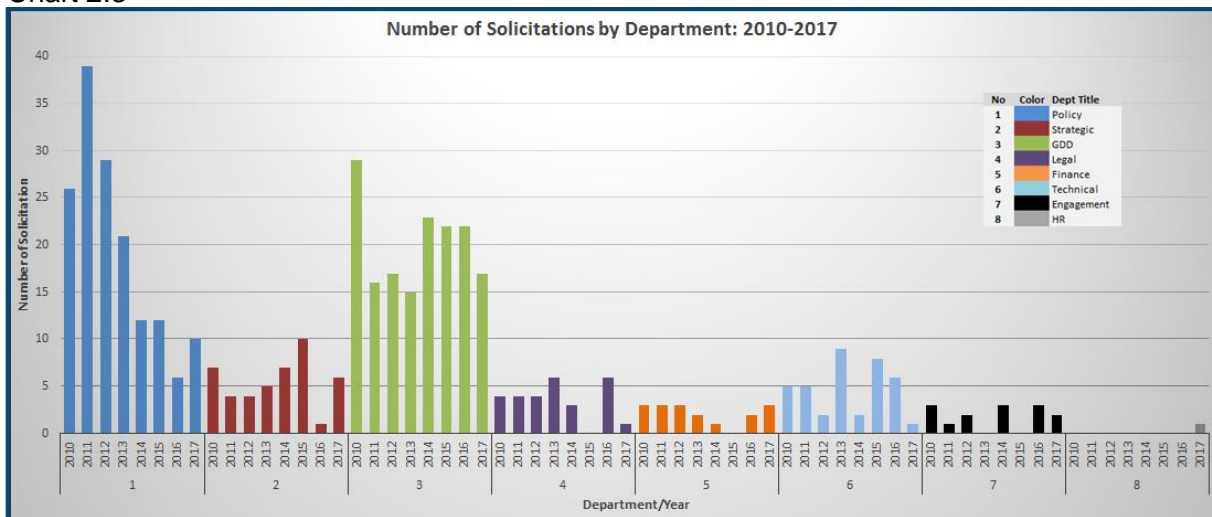
Although significant variations occur within departments, the overall number of topics closed each month has been relatively stable over the study period and, barring any fundamental shifts in the underlying dynamics, would be predicted to continue in the approximate range of 12-15 per quarter (or 4-5 per month) on average.

2.2   Proceedings Translated

One of the data elements captured for each proceeding was whether or not translation services were utilized (see Chart 2.4). For this purpose, a proceeding was scored "Yes" for translations if there was evidence that any portion of the materials presented was made available in a language other than English[2]. There was no minimum requirement for number of languages selected or extent/type of material translated. Even if just one reference

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[2] This data references only Public Comment proceedings not announcements, which are often translated.

document was available in another language (e.g., French, Spanish), it was counted as having utilized translation services.
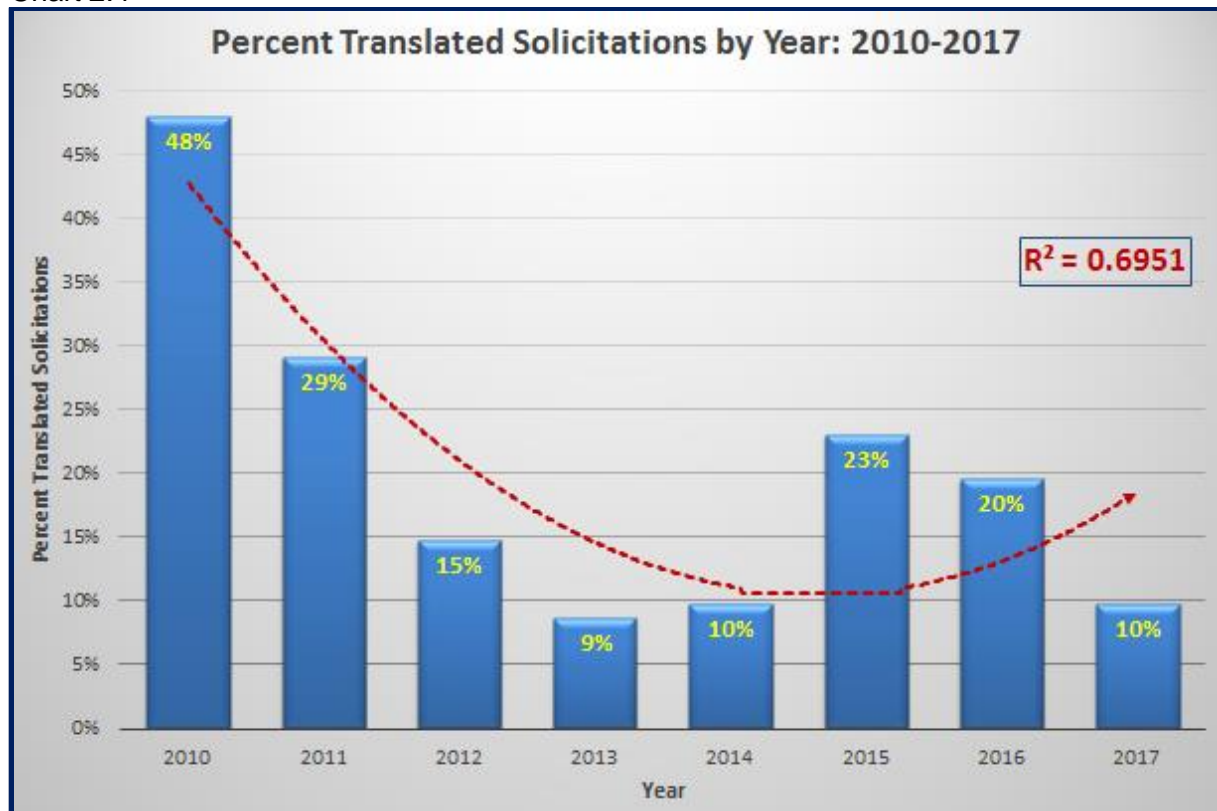
Chart 2.4

Chart 2.4 above shows that, from 2010-2013, there was a steady decline in the use of translations for Public Comment proceedings; however, that trend appears to be reversing as indicated by the relatively noticeable increase during 2014-2016 with an R2 of .90. However, the R2 dropped to .70 as a result of only 4 of 41 proceedings containing translations. As will be explored further in Section 4-Findings and Conclusions, initiatives were undertaken in early 2015 by the Policy Department, working with the Language Services team, to increase the number of translated proceedings.

2.3   Proceedings Length

Based upon the published Open and Close Dates (extended dates were always used where applicable), it was possible to determine the average (mean) length of time that Public Comment proceedings remained open for community participation.

The following Chart 2.5 illustrates that the average length for Public Comment proceedings was 43 calendar days in 2010-2011, but has averaged 51 days from 2012-2017. The overall comment period length has step-increased by 8 days on average. This result can be traced to a combination of: (1) ATRT1 improvements (2012-2014) and (2) changes to ICANN Organization guidelines (ATRT2) in direct response to ICANN community requests for increased time to provide feedback.

Chart 2.5

Mean Comment Period Length (Days) by Year: 2010-2017

Average = 43 Days

Average = 51 Days
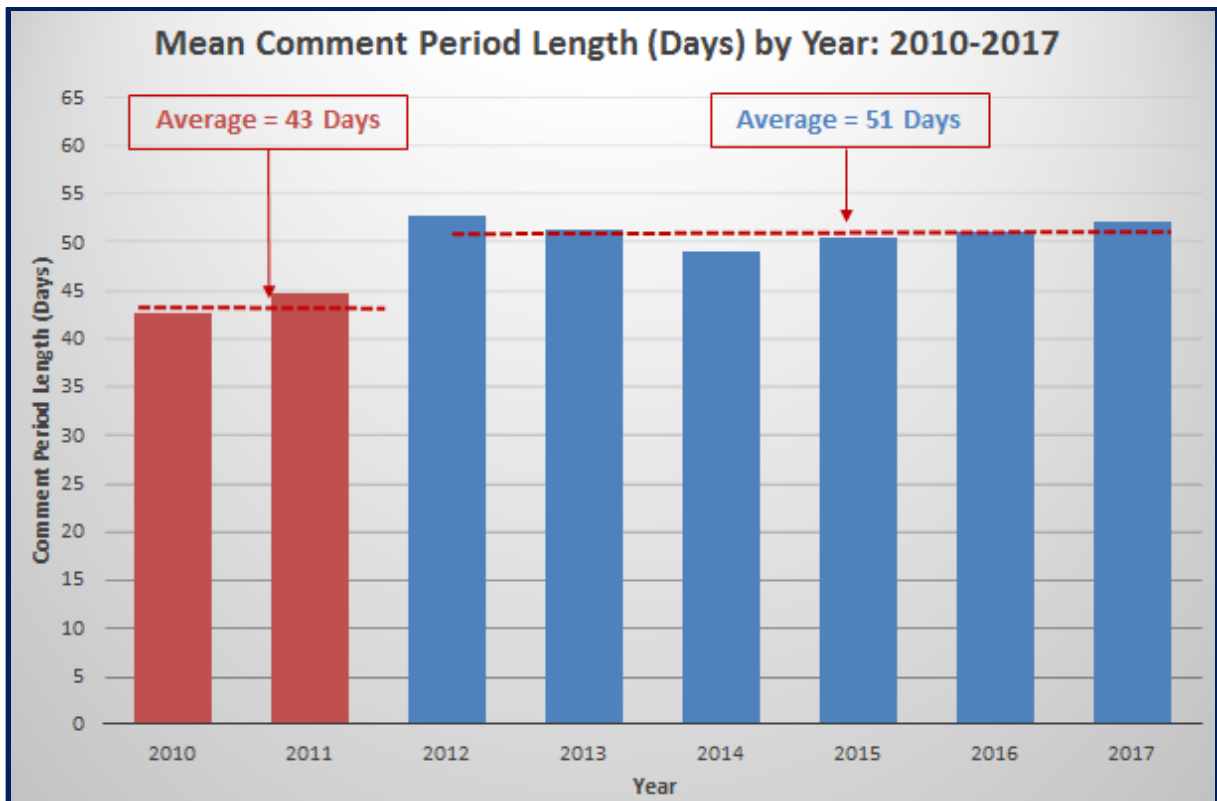
In concert with the suspension of Reply Cycles effective January 2015, the target minimum default period for Public Comment proceedings was established at 40 days; however, the mean length has remained in the range of 50-52 days.

The next chart (2.6) is a frequency histogram showing the complete history (2010-2017) of comment period lengths where the vertical axis represents percentage and the horizontal axis shows the number of days in groups of 10. The tallest bar, then, indicates that 36.9% of all proceedings (169 of 458) were open between 40-49 days.

Chart 2.6

Frequency Histogram: ALL Comment Period Lengths
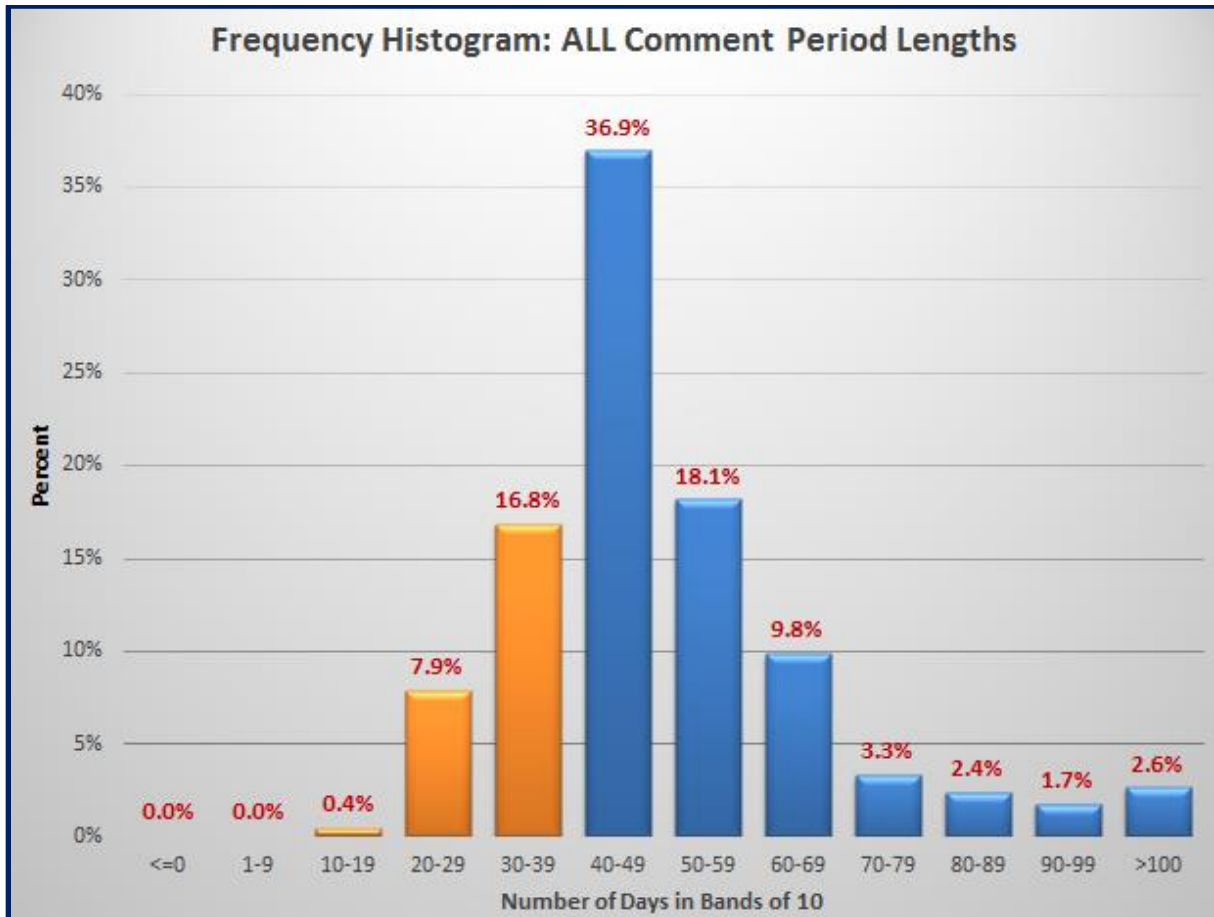
Over the course of the eight-year horizon, the above chart shows that .4% (2) of all proceedings were open for 10-19 days, 7.9% (36) for 20-29 days, and another 16.8% (77) for 30-39 days. Adding the three orange-shaded bars together, 25.1% of all topics were open for less than 40 days, which, as of January 2015, became the targeted minimum ICANN Organization standard.

To examine the most recent experience of ICANN Organization Departments adhering to the minimum guidelines for comment period length (change effective January 2015), Chart 2.7 (below) displays the last three years (2015-2017) of Public Comment proceedings (Total=139) in the form of a frequency histogram using the same axis structure as the previous diagram.

Chart 2.7

Frequency Histogram: 2015-2017 Comment Period Lengths
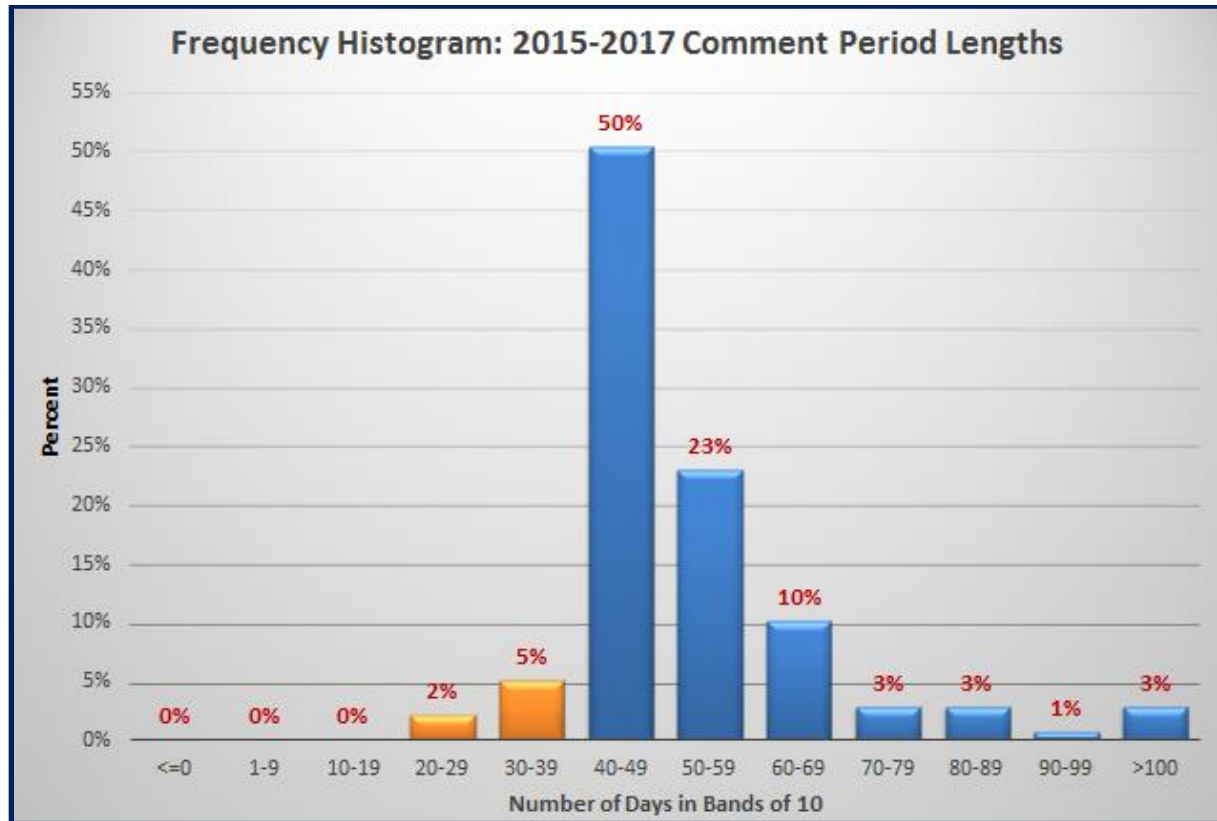
The above histogram confirms that 93% of topics in those three years were open for 40 days or longer (blue-shaded bars), thus satisfying the minimum target requirement. On the other hand, 2% of those proceedings (3) were open for 20-29 days while 5% (7) were open for 30-39 days – both below the standard period length.

Table 2.1 below is a listing of the 10 Public Comment topics that were open for less than 40 days in 2015-2017 sorted chronologically by Year/Quarter. Each row also displays the Open and Close dates as well as the total number of days during which ICANN community comments were accepted as having met the published timeframe.

Public Comment Title	Year	Qtr	Mo	Open	Close	Days
2nd Draft Proposal of the Cross Community Working Group to Develop an IANA Stewardship Transition Proposal on Naming Related Functions	2015	2	5	22-Apr-15	20-May-15	29
CCWG-Accountability - Draft Proposal on Work Stream 1 Recommendations	2015	4	12	30-Nov-15	21-Dec-15	22
Draft New ICANN Bylaws	2016	2	5	21-Apr-16	21-May-16	31
Draft Root Zone Evolution Review Committee (RZERC) Charter	2016	3	7	10-Jun-16	10-Jul-16	31
Draft PTI Articles of Incorporation	2016	3	7	1-Jul-16	31-Jul-16	31
PTI Governance Documents	2016	3	8	8-Jul-16	7-Aug-16	31
Draft PTI Bylaws	2016	3	8	12-Jul-16	11-Aug-16	31

IANA Naming Function Agreement	2016	3	9	10-Aug-16	9-Sep-16	31
Middle East and Adjoining Countries 2016-2019 Strategy	2016	4	11	28-Oct-16	17-Nov-16	21
Address Supporting Organization (ASO) Review Final Report	2017	3	9	8-Aug-17	6-Sep-17	30

3 Findings Related to Comments

This section summarizes findings that relate to ICANN community comments[3] rather than the formal proceedings themselves.

3.1 Most Popular Proceeding Topics (Total Posts Received)

The top eleven (due to a tie for 10th) most popular[4] Public Comment topics during the years 2010-2017 are shown in Table 3.1 below, sorted in descending order by total number of comments:

Public Comment Title	Close-Date	Comments
Phased Allocation Program in .JOBS	15-Jul-10	316
New gTLD Program – Draft Expressions of Interest/Pre-Registrations Model	27-Jan-10	277
"Closed Generic" gTLD Applications	7-Mar-13	252
Proposal for Renewal of the .NET Registry Agreement	10-May-11	186
Proposed Final New gTLD Applicant Guidebook	15-Jan-11	177
New gTLD Program - Draft Applicant Guidebook, Version 4 and Explanatory Memoranda	21-Jul-10	164
New gTLD Board Committee Consideration of GAC Safeguard Advice	14-May-13	129
New gTLD Applicant Guidebook – April 2011 Discussion Draft	15-May-11	107
Cross Community Working Group on Enhancing ICANN Accountability 2nd Draft Report (Work Stream 1)	12-Sep-15	101
CCWG-Accountability - Draft Proposal on Work Stream 1 Recommendations	21-Dec-15	99
Public Comment on Proposed Amendment to .COM Registry Agreement	12-Aug-16	99

It appears that 70% of the most popular Public Comment topics were related to the New gTLD program in one way or another.

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[3] As noted in Section 1-Background & Overview, a recommendation of ATRT1 was implemented during the period from Q2/2012 through Q4/2014, which bifurcated each Public Comment proceeding into a Comment period and Reply cycle. Based upon the results of a thorough ICANN Organization analysis, that process step was eliminated effective January 2015. For this report, the term "Comments" returns to its pre-ATRT meaning; however, for the periods when "Replies" were submitted, those corrected values have been included so as not to misrepresent the total community response levels at the time.

[4] Two proceedings dealing with the .XXX domain (May & September 2010) were eliminated from this study as significant outliers having received over 13,000 and 700 submissions respectively. In addition, a proceeding dealing with "GNSO Privacy & Proxy Services Accreditation Issues" (July 2015) received over 11,000 comments and was similarly removed.

3.2 Least Popular Proceeding Topics (Total Comments = 0)

At the opposite end of the spectrum (see Table 3.2 to the right), there were 33 Public Comment topics (see Table 3.2, column 3) for which there were no comments submitted (8% of the study sample).

This information is also depicted graphically below in Chart 3.1.

Year	Total Proceedings	Zero Comments	Percent
2010	77	7	9%
2011	72	8	11%
2012	61	3	5%
2013	58	6	10%
2014	51	8	16%
2015	52	0	0%
2016	46	1	2%
2017	41	0	0%
Totals...	417	33	8%

Chart 3.1
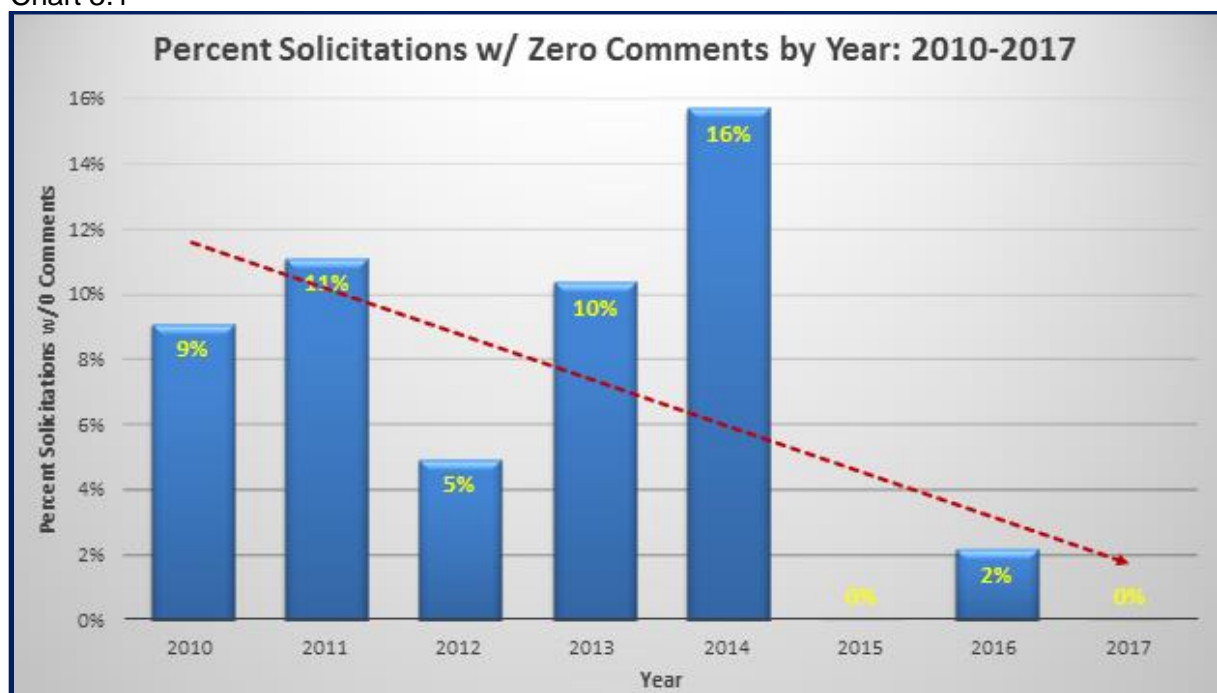
The percentage of proceedings experiencing zero comments from the ICANN community has decreased markedly since 2010-2014. In 2015 and 2017, every proceeding received comments and, in 2016, only 2% had no comments submitted.

Noting that the intended purpose of Public Comment is to solicit feedback, guidance, and input from the community, it may be productive to study these 33 cases (see Appendix B) in some depth to determine if anything can be learned as to why no comments were received. For example, a cursory review shows that several of these zero-feedback topics were reports about changes or amendments to existing procedures, e.g., GNSO Operating Procedures, Stakeholder Group or Constituency Charters, or other organizational bylaws. Perhaps there is a more appropriate vehicle for publishing such information than continued use of Public Comment.

3.3 Public Comment Participation Levels

In order to compute a statistically representative number of responses that reflects the Public Comment experience from 2010-2017, it is important to recognize that several topics generated abnormally high comment levels (see Top Ten List in Table 3.1 above). If one were to calculate the simple average (mean) of all comments received (5,539) across all proceedings over the eight-year horizon (458), it would equal 12 (5539/458=12.1); however, that figure is misleading because it is heavily influenced by several unusually large volumes.

The most appropriate time to use a mean or average is when a set of values approaches a "normal" distribution or "bell curve" (see illustration to the right).

Chart 3.2 (below) is a frequency histogram which shows, in increments of 20, the percentage of proceedings (blue) and Comments (red) within each band. For example, the 2nd grouping of bars signifies that 78% of the proceedings (358 out of 458) received 1-20 comments, but that grouping accounted for only 37% of the total comments submitted (2284 out of 6216). Similarly, at the upper tail, 2% of the proceedings (9 out of 458) were responsible for 27% of the total comments received from 2010-2017!
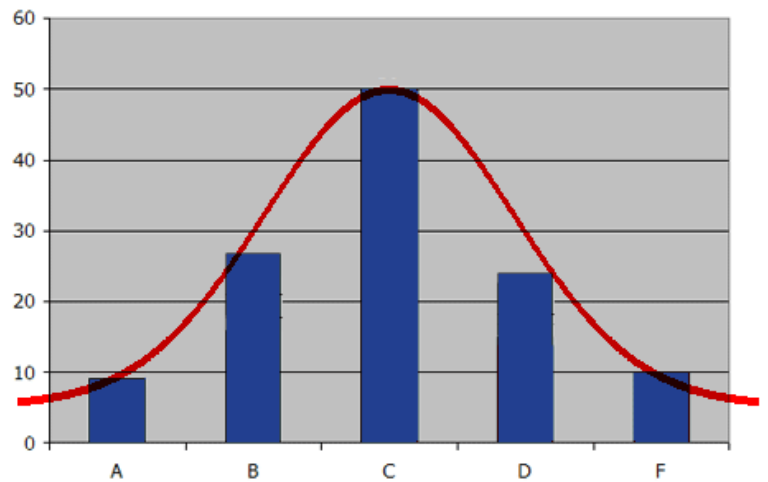
Comparing the heavily skewed and lopsided shape of Chart 3.2 to the "normal" distribution above, it becomes clear that a small number of outlier values at one extreme would significantly overstate any representation as to the typical number of comments experienced overall.

Chart 3.2

**Frequency Histogram: Solicitations vs. Comments**
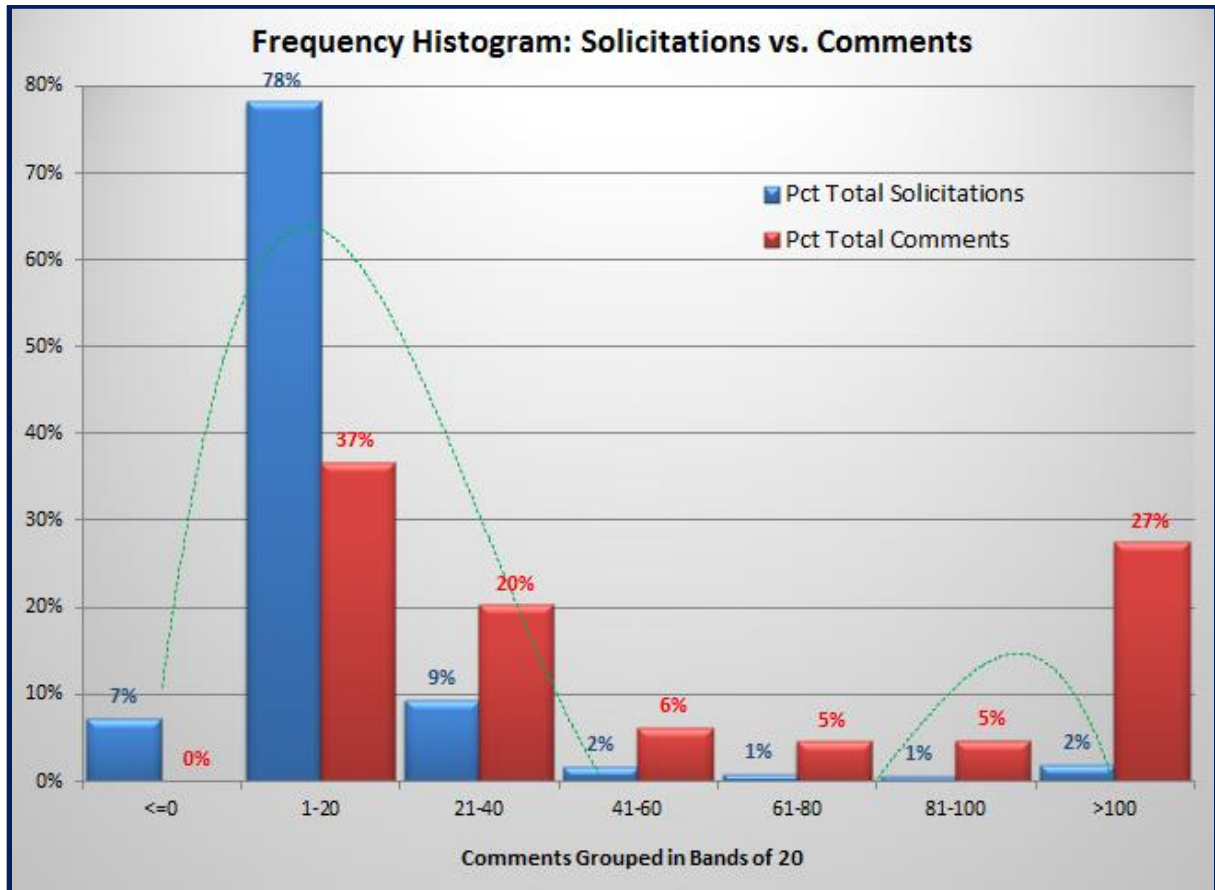
Heavily skewed distribution in which 78% of the proceedings (with 1-20 comments) account for only 37% of the total comments received; whereas, at the upper end, 2% of the proceedings (>100 comments) represent 27% of the total comments. Note that 7% of all proceedings had zero comments submitted.

Recognizing that simple averages (means) are inappropriate for such a skewed distribution, the preferred measure of central tendency to apply is the median, that is, the mid-point where 50% of the results occur above and below the statistic.

Having explained the mathematical distortion that would result in using means (or averages) for comment volumes, Chart 3.3 shows the median number of comments by year over the study period. The graphic illustrates that, during the period from 2010 through 2017, the median number of comments per proceeding has been relatively stable between 5-7 in five of the eight years. In 2011, the value dropped to 4 and, in 2015, it was slightly above 7.
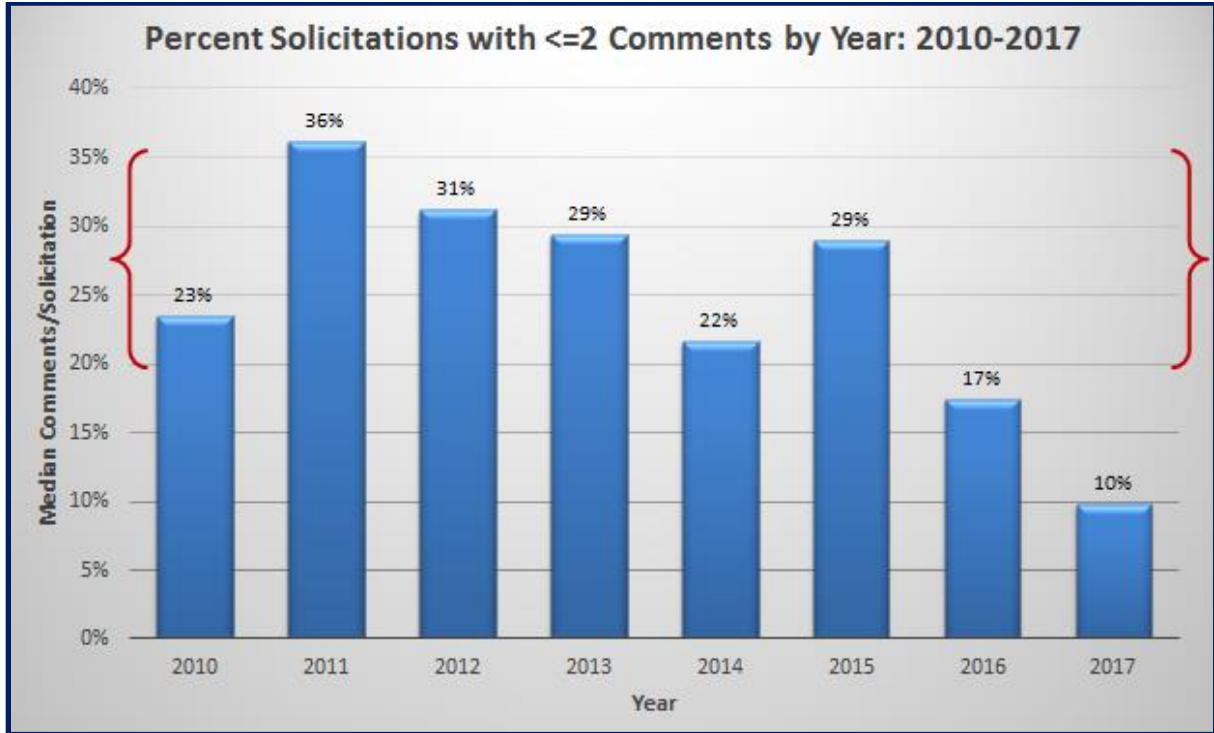
Chart 3.3

Median Comments/Solicitation by Year: 2010-2017
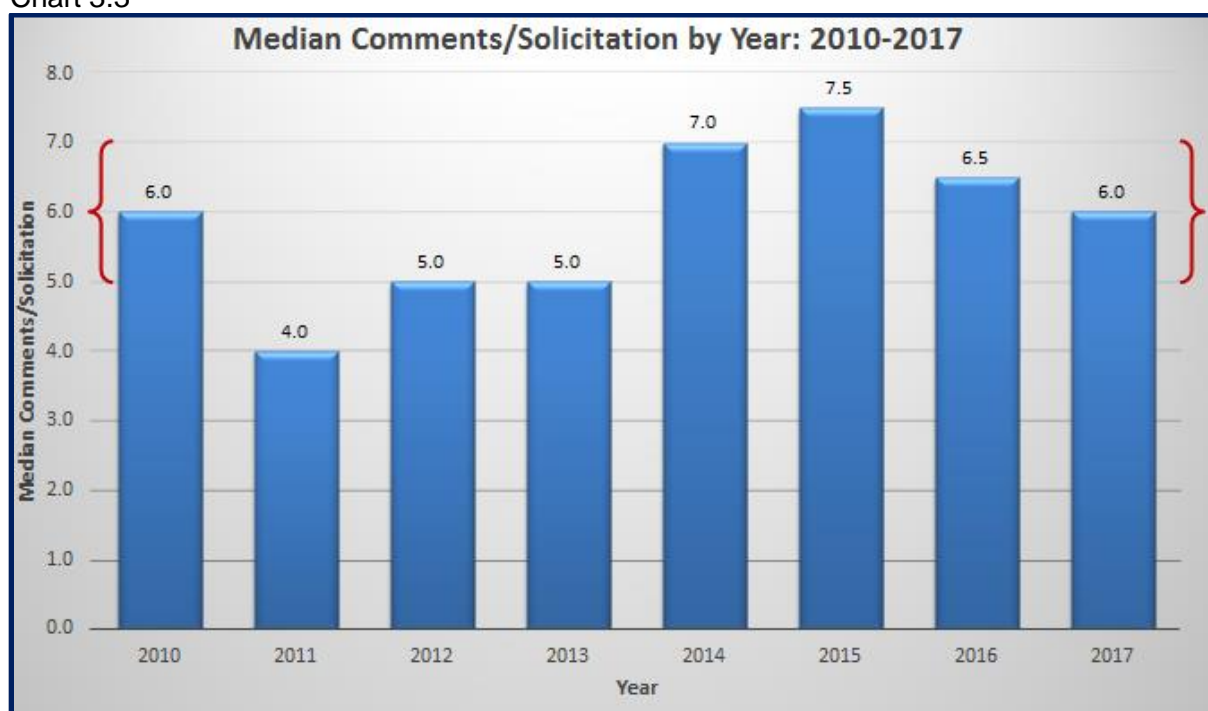
While examining the overall participation experience, the next graphic (Chart 3.4) illustrates that, overall, 26% of all proceedings from 2010-2017 received less than or equal to 2 comments and, although not displayed in this chart, 7% (or 33 proceedings) experienced zero submissions (see Table 3.2 and Chart 3.1 above).

There has been no fundamental change in this data before or after the two ATRT implementations nor did it change after the suspension of Reply Cycles effective January 2015 (see Appendix A for further explanation). It is evident, however, that beginning with 2016, the number of proceedings receiving 0-2 comments has decreased noticeably. It would require a deeper analysis into proceedings themselves – outside the scope of this report - to determine whether their content tends to be characteristic of topics for which community members are more or less likely to provide feedback.

Chart 3.4

Percent Solicitations with <=2 Comments by Year: 2010-2017

Year	Median Comments/Solicitation
2010	23%
2011	36%
2012	31%
2013	29%
2014	22%
2015	29%
2016	17%
2017	10%

Over the 8-year horizon, a little more than 1 in 4 (26%) Public Comment proceedings (118 out of 458) accumulated 0, 1, or 2 community comments. In six out of the 8 years (90%), the percentage of proceedings receiving <=2 comments ranged between 20% and 35%.

4 Overall Findings, Conclusions, and Recommendations

The following sections summarize findings that can be deduced from this data analysis as well as statements indicating where further research is needed.

4.1 Participation Levels

The median number of total comments submitted per proceeding has been in the range of 5-7 throughout the eight-year data horizon. As noted in Section 3-C, there were two years, 2011 (4) and 2015 (7.5), when that value dipped slightly below or above that range. There is no supporting quantitative evidence that community participation levels have been materially affected by any of the changes introduced as a result of ATRT1 or ATRT2 enhancements or, for that matter, any other changes introduced to Public Comment processes or protocols.

In evaluating the median number of comments, it is important to recognize that, in many cases, one response may represent the collective feedback of an entire organization (potentially hundreds of members) rather than a single individual. Several community groups have explained to ICANN Organization that they have processes through which they develop and distribute one or more policy position drafts for internal review and consensus (or voting) before they are formally submitted to the Public Comment process.

Noting that the intended purpose of the Public Comment process is to solicit feedback, guidance, and input from the volunteer community, it may be productive to study the 33 cases (see Appendix B) that received zero comments. It may be that, for certain classes of topics (e.g., procedural changes, charter revisions, organization bylaws), there may be more appropriate methods for dissemination of the information than continued use of the Public Comment facility.

4.2 Comment Period Length

The analysis has determined that the overall length of proceedings has increased by approximately 8 days (see Section 2-C, Chart 2.5) attributable, at least in part, to the addition of a Reply Cycle averaging 20 days while having only shortened the original average comment period (43 to 31 days) by 12 (20-12=8). Coincident with the suspension of Reply Cycles in January 2015, the target for each comment period was established at a minimum of 40 days; however, the actual experience in 2015-2017 has been pretty steadily within the range of 50-52 days. There is no evidence, based upon the data analyzed from 2010-2017, that lengthening the entire period by 8 (from 43 to 51) days has resulted in any measurable change to the response or participation rate.

4.3 Language Translations

As reported in Section 2-B (see Chart 2.4), there has been a noticeable increase during 2014-2016 in the percentage of Public Comment proceedings that have been translated into languages other than English. That significant uptick follows a period of steady decline from 2010-2013. However, in 2017 only 10% or 4 proceedings were translated which reverts to a downtrend from the 2014-2016 period.

In 2015, the Policy Department, worked with the Language Services team to materially increase the number of translated proceedings. The success of that effort was attributed, in part, to streamlining internal workflows which facilitates more translated content thus providing relevant, multilingual proceedings for an increasingly global community of participants.

A further analysis should be undertaken to determine the drivers of the recent downtrend in the use of translation services for Public Comment proceedings. Should it be expanded in line with initiatives to increase participation and inclusion from non-English speaking community members or should it focus on more demand driven criteria given current budget constraints? In addition, it may be productive to consider whether such services should be provided for each of these six areas:

1. Announcement page
2. Public Comment Open page
3. Documents attached to a proceeding (e.g., PDFs)
4. Comments submitted
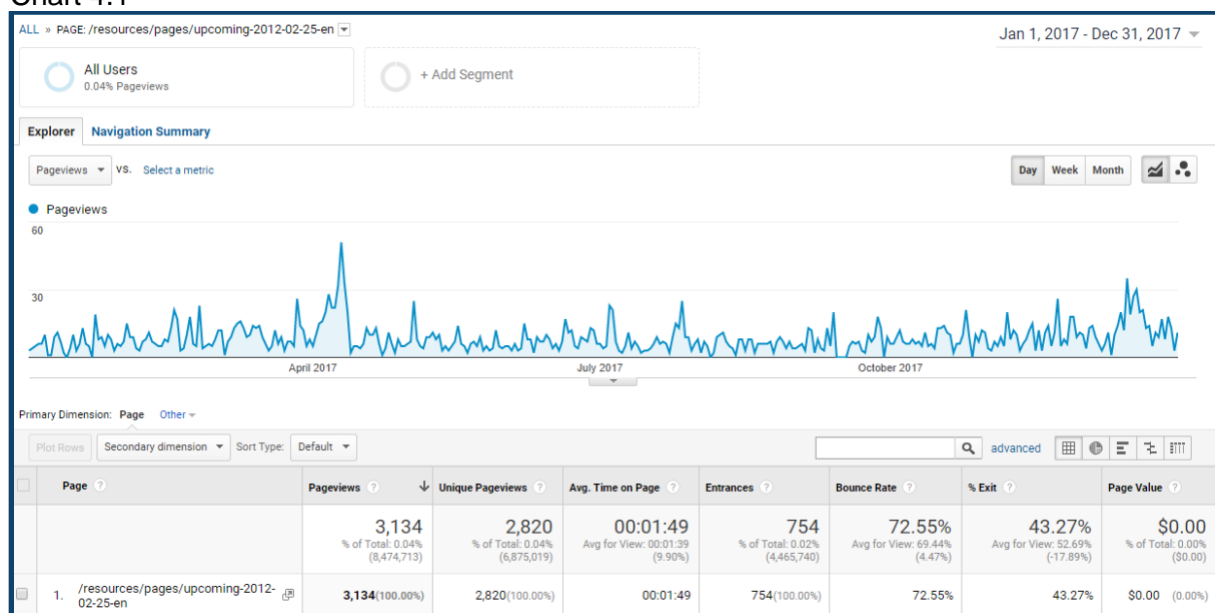5. Summary Reports
6. Issues Tracking Checklists

If a decision is taken to change the way that translations are implemented, it may be useful to similarly alter the methodology applied for tracking and reporting purposes including adjusting the historical data (back to 2010) so that trends can be meaningfully compared.

4.4   Ongoing Topics

FORECASTING:
No data has been available for analysis that would help assess the extent to which forecasting and publishing "Upcoming Public Comment Proceedings" has been beneficial to the community. To evaluate the value and benefit of this particular enhancement would require additional research, possibly incorporating a survey instrument or focus group. While not a perfect indicator, the following chart depicts website traffic to that page:

Chart 4.1

SUMMARY REPORTS:
In 2015, a Service Level Objective (SLO) was set for when the summary report of Public Comments should be posted. This standardized the expectations for summary reports, which lacked a clear process before 2015. In general, the duration of the report posting correlates to the number of and complexity of the comments submitted. The target publication date for the summary report is two weeks after the conclusion of the public comment proceeding. When analyzing the duration, it should also be noted that some proceedings depend on a review and response to the comments, for example a policy development process working group as opposed to a proceeding initiated by the ICANN Organization. The Policy Development Support Department reviews requests for extensions and grants them based on the circumstances of each individual proceeding and summary report. The chart below shows the average duration of report posting by year, and it also calls at the greatest and smallest posting durations. In 2017, the duration of report posting on average increased by 10 days from 2016, but also note that there were 6 fewer comments than the prior year with also two outliers beyond 100 days. Thus, the increased range from Min to Max.

Chart 4.2
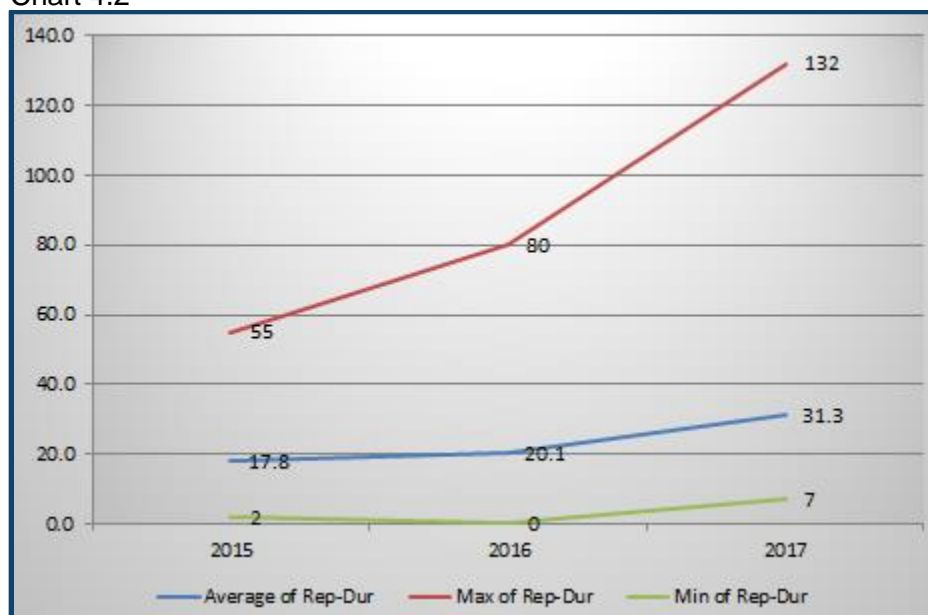
4.5   Public Comment Process Changes Introduced in 2016

In February 2016, the Policy Department launched a Public Comment portal to process all proceeding requests. The portal streamlines the internal ICANN Organization process for submitting requests to open and close Public Comment proceedings as well as to request extensions and post Summary Reports. It also centralizes the location of the various templates and the Guidelines. Two Policy Development Support Department members manage the portal and collaborate with the Web Content Operations team to ensure timely approvals of all requests. The portal has improved the internal workflow and allowed for better communication and troubleshooting. The Policy Development Support Department has not received any negative feedback about the portal or its management of the Public Comment process.

4.6   Planned Improvements

Improvements to Public Comment are planned as part of the Information Transparency Initiative which launched in January 2018. The scope of the effort is still in development; however, the improvements will focus on user experience and process. Working with the Communications and Information Technology and Engineering Departments, the Policy Development Support Department will inform the community about these planned improvements and seek input as appropriate.

5   Appendix A: Background and Overview

The first edition of this report (May 2013) was produced to analyze the effects of changes to ICANN Public Comment proceedings recommended by the first Accountability and Transparency Review Team (ATRT1 Phase). It was refreshed (January 2015) as a result of additional recommendations emanating from the second ATRT deliberations (ATRT2 Phase) as well as improvements identified by the Policy Development Support Department from the original data analysis. The sections below represent a summary of each of these major phases as well as the principal outcomes or findings that resulted.

ATRT1 Phase (Q2/2012-Q4/2014)

As an outcome of the 2011 ATRT1 Recommendations, a series of Public Comment enhancements were designed and implemented to address: prioritization, stratification, comment/reply cycles, timelines, and upcoming topics. Following is a list of the four specific ATRT1 recommendations and the phased implementation that culminated on 1 January 2012:
Rec #15: Incorporate prioritization and stratification based on community input and consultation with the ICANN Organization.
Rec #16: Create distinct Comment and Reply cycles that allow community respondents to address and rebut arguments raised.
Rec #17: Establish fixed duration Timelines to provide adequate opportunity for considered and timely comments and replies.
Rec #21: Introduce forecasts of Upcoming public comments topics to facilitate community planning & participation.

The Policy Development Support Department developed a program to implement the above recommendations in two phases as shown in the table below:

Implementation Phases	Recs	Effective Date
Phase I included ICANN.org website design improvements to streamline presentation and navigation; templates for consistency; and Upcoming topics forecasting.	#21	1 Jul 2011
Phase II included the introduction of Comment-Reply cycles, Stratification (i.e., categories), and minimum fixed duration timelines of 21 days each for initial comments and replies.	#15, #16, & #17	1 Jan 2012

Approximately one year after those enhancements were introduced, the Policy Development Support Department performed an analysis to determine what could be learned based upon actual community usage and participation patterns. That report, entitled "Public Comment Data Analysis (Jan 2010-Dec 2012)," was published in May 2013 and is available at this link: https://community.icann.org/x/CB5-Ag.

Perhaps the most significant finding of the May 2013 report was that the ATRT1 recommendation to introduce a Reply Cycle protocol was not being utilized according to the published instructions. In fact, after cleaning up the raw data to remove submissions that did not meet the original criteria (73%), the average number of legitimate Replies to Public Comment proceedings between Mar 2012-Dec 2012 was less than 1.0; moreover, 70% of all proceedings received no qualified Replies and another 18% received one Reply.

ATRT2 Phase (Q1/2015-Q4/2015)

A decision was taken in May 2014, among other Public Comment enhancements discussed below, to suspend the Reply Cycle protocol. After working through website development revisions and implementation logistics, that change took effect for all proceedings opening on or after 26 January 2015.

In light of those developments as well as recommendations arising from ATRT2, the Policy Development Support Department decided to update the Public Comment Data Analysis to incorporate proceedings from 2013 and two quarters of 2014 (18 months). That report, published in January 2015, represented a data refresh of all Closed Public Comment proceedings from January 2010 through June 2014 (4.5 years total) and is available at this link: https://community.icann.org/x/xpAQAw.

In the above-referenced report edition, there were 286 individual Public Comment proceedings analyzed and its conclusions corroborated those from the May 2013 report as quoted below from Section 4.0-Overall Conclusions:

"As initially reported in May 2013, the extended data set continues to show that the Reply Cycle is not being utilized as originally envisioned. After examining the submissions for each proceeding from January 2013–June 2014 and appending that data to what had been reported from March 2012–December 2012, over 77% of replies were determined to be original comments submitted after the deadline. That figure is up 4% compared to the May 2013 data analysis. The average number of adjusted Replies continued to hover at approximately 1.0 per proceeding and 80% of all proceedings during that period received 0 or 1 Replies after data cleanup[5].
The ICANN Organization determined mid-way through 2014 that the Reply Cycle should be suspended. That decision is supported by this extended data analysis, which shows that the preponderance of Replies are simply late submissions forwarded after the original Comment Period closed."

In addition to the suspension of Reply Cycles, other changes to the Public Comment process were implemented beginning with 2015 including:

Enhancement Title
1)   Suspend "Reply Cycles"
2)   Introduce Minimum 40-Day Comment Period Default Target
3)   Reinforce Clear Deadlines for Summary Reports
4)   Implement Summary Report Community Inquiry Protocol

Process Improvement
1)   Redirect All Public Comment Requests through the Policy Development Support Department
2)   Establish ICANN Organization Advisory Committee

This report will not attempt to address the above improvements because a separate analysis, entitled "Special Report on ATRT2 Enhancements Effectiveness (15 Dec 2015),"was published to determine their overall effectiveness and is available at this link: https://community.icann.org/x/aI9lAw.

Post-ATRT (Q1/2016-Q4/2016)

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[5] The statistics in this paragraph all increased slightly once the data points were extended to include all of 2014.

Now that all of the changes introduced as a result of both ATRT1 and ATRT2 have been reported and analyzed, the Policy Development Support Department has decided to continue Public Comment reporting on; however, it is no longer relevant to highlight and compare the various ATRT phases and, considering the significantly larger data pool available, the charts/graphs in the current report are summarized annually instead of quarterly.

6 Appendix B: Public Comment Proceedings Receiving Zero Comments (2010-2017)

Public Comments Title	Close-Date	Comments
One & Two-Character .CAT Domains	17-Jan-10	0
RSSAC Review – Draft Working Group Report	5-Jun-10	0
GNSO Council Operations Work Team and Constituency and Stakeholder Group Operations Work Team Recommendations	18-Jul-10	0
Transparency and Accountability Wiki Project -- ICANN Board Resolutions - Draft - 2009	26-Jul-10	0
Public Participation Committee Webinar Information	3-Nov-10	0
Proposed Changes to the ICANN Bylaws Article XI: Advisory Committees Relating to the Charter and Membership of the Security and Stability Advisory Committee (SSAC)	2-Dec-10	0
Proposed Bylaws Amendment to Create a Non-Voting Chair-Elect to the Nominating Committee	10-Dec-10	0
Interim Paper Inclusion of IDN ccTLDs in the ccNSO	21-Jan-11	0
Permanent Charter of GNSO's Commercial Stakeholder Group Completed – Public Comment Invited	23-Jan-11	0
Proposed ICANN Meeting Dates 2014 - 2016	8-Mar-11	0
ccNSO DRDWG Final Report	15-Mar-11	0
Proposed Changes to Section 5.0 of the GNSO Council Operating Procedures	26-Mar-11	0
Proposed Revisions to Chapters 3 and 4 of the GNSO Council Operating Procedures Relating to Proxy Voting	9-Aug-11	0
IDN ccPDP WG 2 – Draft Final Report	15-Dec-11	0
Inter-Registrar Transfer Policy Part B – Recommendation #8 and #9 Part 2 – Staff Proposals	31-Dec-11	0
Global Policy Proposal Recovered IPv4 Address Space	4-Apr-12	0
WHOIS Technical Requirements Survey - Draft	20-Jun-12	0
ICANN's FY 13 Security, Stability and Resiliency Framework	2-Jul-12	0
Amendments to Article XI, Section 2.3 of the ICANN Bylaws - DNS Root Server System Advisory Committee (RSSAC)	2-Feb-13	0
Consultation on Internet Number Resources Performance Standards	11-Dec-12	0
Preliminary Issue Report on Uniformity of Reporting	22-Mar-13	0
Proposed Modification of GNSO PDP Manual to Address the Suspension of a PDP	6-Apr-13	0
Locking of a Domain Name Subject to UDRP Proceedings Policy Development Process (PDP) Recommendations for Board Consideration	23-Aug-13	0

Public Comments Title	Close-Date	Comments
Consultation on gTLD Delegation and Redelegation User Instructions and Source of Policy and Procedures	1-Oct-13	0
Proposed Modifications to GNSO Operating Procedures to Address Resubmission of Motions and Working Group Self Assessment	3-Mar-14	0
ICANN Cross Community Working Group on Internet Governance's Submission to NETMundial	29-Apr-14	0
Registrars Stakeholder Group (RrSG) Charter Revisions (May 2014)	20-Jun-14	0
Study to Evaluate Solutions for the Submission and Display of Internationalized Contact Data	3-Jul-14	0
.NGO and .ONG Registry Services Evaluation Process Request - Introduction of Technical Bundling	8-Jul-14	0
Registry Services Technical Evaluation Panel (RSTEP) Report on Public Interest Registry's Request to Implement Technical Bundling in .NGO and .ONG	5-Aug-14	0
Proposed Changes to GNSO Operating Procedures	8-Oct-14	0
.NGO/.ONG Registry Agreement Amendment - Mandatory Technical Bundling of Second-Level Domains	26-Nov-14	0
Proposal for Georgian Script Root Zone Label Generation Rules (LGR)	28-Oct-16	0

Total = 33; sort order is chronological