

**Initial Report on the
Proposed Policy for a Review Mechanism for IFO
decisions which apply to ccTLDs (CCRM)**

ccNSO PDP3 Review Mechanism Working Group (CCPDP3WG-RM)

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1 Context and Introduction

1.1 Context

The ccNSO Delegation and Redelegation Working Group (DRDWG) already noted in 2011¹ that the lack of a ccNSO developed policy relating to an independent Review Mechanism needed to be filled to increase the predictability and legitimacy of decisions pertaining to the delegation, transfer, revocation and retirement of ccTLDs,

To date decisions taken as part of the processes for the delegation, transfer, revocation and retirement of ccTLDs are not subject to an independent review or appeal mechanism. However, over time the requirements for such a process have been clearly stated in several critical documents:

RFC 1591 - According to RFC 1591, section 3.4, the Internet DNS Names Review Board (IDNB), a committee established by the IANA, will act as a review panel for cases in which the parties [Issue Manager: The Significantly Interested Parties²] cannot reach agreement among themselves. The IDNB's decisions will be binding. The IDNB was never established by IANA, or any other entity.

Framework of Interpretation - With respect to the IDNB the FOIWG noted: The FOI WG believes it is consistent with RFC 1591 (section 3.4) and the duty to act fairly to recognize the manager has the right to appeal a notice of revocation by the IANA Operator to an independent body.

CWG-Stewardship and CCWG-Accountability - The CWG-Stewardship proposed that: An appeal mechanism be instituted, for example in the form of an Independent Review Panel, for issues relating to the IANA functions. The notion of a review mechanism was further developed by the CCWG -Accountability as part of its workstream 1. It would be for direct customers of the IANA Naming Function with non-remediated issues or matters referred by the ccNSO or GNSO after escalation by the CSC. However, following public comments on the proposals, it was agreed that the appeal mechanism would not cover issues relating to ccTLD delegation and re-delegation, with the understanding that such a mechanism would be developed by the ccTLD community after the transition³.

¹ See DRD WG Final Report, page 19, <http://ccnso.icann.org/workinggroups/drd-wg-final-report-07mar11-en.pdf> and Council Decision 16 March 2011, <http://ccnso.icann.org/workinggroups/minutes-council-16mar11-en.pdf>

² Section 3.4 RFC 1591 is about the definition and role of Significantly Interested parties.

³ The CCWG- Accountability also proposes that the IRP:

Be subject to certain exclusions relating to the results of an SOs policy development process, country code top-level domain delegations/ redelegations, numbering resources, and protocols parameters. See: page 33
<https://www.icann.org/en/system/files/files/ccwg-accountability-supp-proposal-work-stream-1-recs-23feb16en.pdf>

ICANN Bylaws 1 October 2016 – Reconsideration According to latest version of the ICANN Bylaws (Section 4.2) Reconsideration⁴:

Section 4.2. RECONSIDERATION - (a) ICANN shall have in place a process by which any person or entity materially affected by an action or inaction of the ICANN Board or Staff may request ("Requestor") the review or reconsideration of that action or inaction by the Board. For purposes of these Bylaws, "Staff" includes employees and individual long-term paid contractors serving in locations where ICANN does not have the mechanisms to employ such contractors directly.

(d) Notwithstanding any other provision in this Section 4.2, the scope of reconsideration shall exclude the following - (i) Disputes relating to country code top-level domain ("ccTLD") delegations and redelegations.

ICANN Bylaws 1 October 2016 – Independent Review Process for Covered Actions (IRP)

Section 4.3 INDEPENDENT REVIEW PROCESS FOR COVERED ACTIONS

(a) In addition to the reconsideration process described in Section 4.2, ICANN shall have a separate process for independent third-party review of Disputes (defined in Section 4.3(b)(iii)) alleged by a Claimant (as defined in Section 4.3(b)(i)) to be within the scope of the Independent Review Process ("IRP"). The IRP is intended to hear and resolve Disputes for the following purposes ("**Purposes of the IRP**"):

(b) The scope of the IRP is defined with reference to the following terms:

(....)

(ii) "**Covered Actions**" are defined as any actions or failures to act by or within ICANN committed by the Board, individual Directors, Officers, or Staff members that give rise to a Dispute.

(iii) "**Disputes**" are defined as:

(....)

Claims regarding PTI service complaints by direct customers of the IANA naming functions that are not resolved through mediation.

c) Notwithstanding any other provision in this Section 4.3, the IRP's scope shall exclude all of the following:

(.....)

(ii) Claims relating to ccTLD delegations and re-delegations;

⁴ <https://www.icann.org/resources/pages/governance/bylaws-en/#article4>

1.2 Introduction

In December 2015, the ccNSO Council discussed the launch of a formal ccNSO Policy Development Process to address the lack of policy with respect to retirement of ccTLDs and to introduce a Review Mechanism on issues pertaining to the delegation, transfer, revocation and retirement of ccTLDs. This discussion was grounded in the need to ensure the predictability and legitimacy of decisions with respect to the delegation, transfer, revocation and retirement of ccTLDs.

In March 2017, and in accordance with Annex B section 3 and 4 of the ICANN Bylaws, the ccNSO Council decided to initiate the third (3rd) ccNSO Policy Development Process with the initial focus on developing a policy for Retirement of ccTLDs (Part 1), and only after the substantive work on that topic would have been concluded, focus on the development of policy recommendations for a Review Mechanism pertaining to decisions on delegation, transfer, revocation and retirement of ccTLDs (Part 2).

The ccPDP3 Retirement WG (CCPDP3WG-RET) began its work In June 2017 and completed its Initial Report early 2020. The ccPDP3 Review Mechanism WG (CCPDP3WG-RM) began its work in the March 2020.

As it became apparent that the originally envisioned advantages of combining the two efforts into one (1) ccNSO Policy Development Process had become obsolete⁵, the ccNSO Council decided on June 2021⁶ to immediately split these two PDPs. Following this split, the ccNSO adopted the retirement policy in September 2021 and submitted it to the ICANN Board of Directors for its consideration. The Board adopted the proposed policy at the ICANN75⁷ meeting in September 2022.

According to its charter the CCPDP3WG-RM has the following goal:

“The goal of the working group (WG) is to report on and recommend a policy for a review mechanism with respect to decisions pertaining to the delegation, transfer, revocation and retirement of the delegated Top-Level Domains associated with the country codes assigned to countries and territories listed in the ISO 3166-1 and within the framework of the ccNSO Policy Development Process.”

⁵ The two efforts were originally combined to enhance simplicity from a ccNSO members perspective (only one members vote) less resources, reduced duration and ensure consistency across the processes.

⁶ <https://ccnso.icann.org/en/about/council/decisions-resolutions/2021>

⁷ <https://www.icann.org/resources/board-material/resolutions-2022-09-22-en#2.c>

The CCPDP3WG-RM charter also listed the following questions:

- Which decisions and/or actions should be subject to a review mechanism?
- Whose decisions and/or actions should be subject to a review mechanism?
- Should a Review Mechanism be open and applicable to all ccTLDs?
- What will be the result / scope of the review decision?
- What powers will be bestowed upon the review panel?
- Who will have standing at a review?
- What are the grounds (for a review)?

As the activities of the WG are undertaken within the framework of the ccNSO Policy Development Process, the limitations with respect to the scope of a ccPDP, specifically by Article 10 and Annexes B and C of the ICANN Bylaws, limit the scope of the WG's work and proposals.

Further, the ccPDP3 Retirement WG was tasked to report to the ccNSO Council on topics or issues which they identified and considered out of scope for the WG.

Finally, In July 2022, the ccNSO Council requested the Working Group specifically recommend and/or advise on the need for clarification of the scope of ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii)⁸.

1.3 Reading Guide for the Initial Report

The Initial Report of the CCPDP3WG-RM includes the details on the recommended policy (section 2 to 6 and 9 of the Initial Report).

In addition, annexes A and B provide details and requirements for various aspects of the policy. The WG believes these details, although important, are suggestions to facilitate and guide implementation.

⁸ In July 2021 the ccNSO Council informed ICANN that for avoidance of doubt disputes and claims related to the retirement of ccTLDs should be handled in the same manner as those pertaining to the delegation, transfer, and revocation of ccTLDs and excluded from ICANN's Reconsideration and Independent Review Process:

...the ccNSO Council believes that ICANN Bylaws Section 4.2 (d) (i) (Disputes relating to country code top-level domain ("ccTLD") delegations and re-delegations) and ICANN Bylaws Section 4.3 (c) (ii) (Claims relating to ccTLD delegations and re-delegations) should be interpreted as to include all disputes and claims concerning delegation, transfer, revocation and retirement of ccTLDs.

We also want to stress and re-confirm that the ccNSO believes all disputes and claims related to the delegation, transfer and revocation of ccTLDs should be excluded from ICANN's Reconsideration Process and the Independent Review Process for Covered Actions.

The Initial Report also contains sections that - although not considered part of the proposed policy itself - provide context to the recommended policy and could assist in future interpretation of the policy as well as an understanding of the considerations of the Working Group. These sections are:

- Stress tests and the results of stress testing (section 7)
- Verification that the charter questions were answered (Section 8)
- Process to date, describing the steps the WG went through in developing the proposed policy (section 10), and finally
- References (section 11)

Finally, as part of the development of this policy, the RM Working Group has created and used a wealth of background documentation such as identifying all IFO decisions pertaining to the delegation and transfer of ccTLDs. Although not part of the Policy as proposed, this material was very helpful in providing an understanding of the context and impact of the proposed review mechanism. The background material, including the presentations by the Working Group and to the Working Group can be found on the webpage and wiki space of the Review Mechanism Working Group⁹.

2 Policy Objective

The objective of the policy is to offer ccTLD managers, and applicants for new ccTLDs, as direct customers of the IANA Naming Function an independent review mechanism for specifically identified IFO decisions. Such a mechanism would be a logical, independent step following the IFO Customer Service Complaint Resolution Process and the IFO Mediation process.

To guide the development and implementation of such a review mechanism it should meet the following objectives:

- Low cost (Registry/Manager fees will be established at implementation but these need to take into account the size/ability to pay of the Registry by having variable fees).
- Fast – Reviewers to return a decision in less than 90 days from the beginning of their consideration of the case.
- Minimize the total time required to review any specific IFO decision.
- Ensure fundamental Fairness

3 Applicability of the Policy

The Review Mechanism for IFO decisions which apply to ccTLDs (CCRM) is available to ccTLD Managers, or applicants for a new ccTLD, who are directly impacted by an IFO decision (Decision) for the following processes:

- Delegations of a new ccTLD

⁹ <https://ccnso.icann.org/en/workinggroups/pdp-review-mechanism.htm>

- Transfers.
- Revocations (A last resort action by the IFO).
- Refusal to grant an extension to the retirement deadline per the CCNSO Retirement Policy.
- Notice of Retirement for two-letter Latin ccTLD which does not correspond to an ISO 3166-1 Alpha-2 Code Element per the CCNSO Retirement policy.
- Any other policy developed by the ccNSO and adopted by the ICANN Board which allows ccTLDs to appeal a decision by the IFO.

4. Review Mechanism for IFO decisions which apply to ccTLDs (CCRM)

4.1 Possible findings of the CCRM

The CCRM will only report on whether:

- There were significant issues with the IFO properly following its procedures and applying these fairly in arriving at its Decision; or
- There were significant issues in how the IFO complied with RFC 1591, the CCNSO FOI for RFC1591 as adopted by the ICANN Board, and any other policies developed through a ccNSO policy development process and adopted by the ICANN Board in making its Decision.

Definition of Significant Issues – Any clearly demonstrable inconsistency or deviation by the IFO of properly following its procedures and applying these fairly or how the IFO complied with the requirements of RFC 1591, the CCNSO FOI for RFC1591 as adopted by the ICANN Board as well as any other policies developed through a ccNSO policy development process and adopted by the ICANN Board in making its Decision which, in the opinion of the Reviewer(s), could have significantly impacted the IFO Decision.

4.2 CCRM Process Overview

- IFO takes a decision that is subject to review (as covered by the policy).
- The ccTLD Manager, or an applicant for a new ccTLD, applies for a Review.
- The CCRM Manager accepts the application.
- Reviewer(s) complete the review.
- If no significant issues were found by the Reviewer(s) the review process is concluded and the IFO decision is confirmed.

- If significant issues were found by the Reviewer(s) the IFO has three options:
 - The IFO accepts the results and adjusts its decision – this would conclude the review process.
 - The IFO accepts the results but opts to redo the process which resulted in the original decision. Once the IFO completes the redo of the process, the original applicant must decide to:
 - Accept the new results – this will conclude the Review process.
 - Apply for a Review of the new decision by the IFO (in such a case if the Reviewer(s) find significant issues the IFO will only have two options – Accept or Reject the findings).
 - The IFO rejects the results:
 - If the IFO decision requires Board approval - the IFO shall include the findings from the review in its recommendation to the Board for confirmation.
 - If the IFO decision does not require Board approval, the ICANN CEO and the ccNSO Council shall be advised of the situation.

Please see Annex A of this document for more details.

4.3 The CCRM Manager

- The CCRM Manager must be a non-conflicted individual who is a Subject Matter Expert with respect to ccTLDs, the IFO and ICANN and who will be responsible for overseeing and managing the CCRM system.
- The office of the CCRM Manager will be funded and managed by ICANN.

Please see Annex B of this document for more details.

4.4 Applicant and Claimant to the CCRM

- Must be a ccTLD Manager except in the case of the delegation of a new ccTLD where any applicant for that new ccTLD is eligible.
- To launch a CCRM, the Claimant must submit an application (Application) via the CCRM website to the CCRM Manager in English within 30 days of the Decision being made except if the Applicant has requested an IFO internal review or IFO Mediation. If the Applicant has used these other mechanisms, within 30 days of the Decision being made, it will be granted 30 days to apply for a CCRM after these processes are completed.
- For cases where there is a potential for more than one Claimant, should there be more than one application for the same IFO Preliminary Decision the CCRM Manager will accept the first application which meets all the eligibility criteria. Should there be a tie

the CCRM Manager will choose which application will be accepted. In all such cases where the CCRM Manager has approved an Application for a Review, the Reviewer(s) will consider all elements of the IFO Decision for all potential Claimants.

- By submitting an Application, the Claimant will agree to the rules for the Independent CCRM, which will include a clause preventing the Applicant from taking the CCRM Manager, Reviewers, the CCNSO, or ICANN to court with respect to the CCRM process or findings (The Working Group recognizes that this in no way prevents the Claimant from taking the IFO or ICANN to a court with relevant jurisdiction regarding the Decision by the IFO and approval of this Decision by the ICANN Board).

Please see Annex B of this document for more details.

4.5 The Reviewers

- All Reviewers will be certified, managed, and supported by the CCRM Manager.
- Reviewers will be paid for by ICANN/IFO.
- Reviewers must be impartial.
- Certification requirements will include a minimum of 10 years of practical experience with respect to ccTLD administration and IFO processes as well as the ability to function in English.
- Findings from the Reviewer(s) cannot be appealed.

Please see Annex B of this document for more details.

4.6 The IFO

- Will maintain a good working relationship with the CCRM Manager.
- Must amend its procedures to allow concerned parties sufficient time to file for a CCRM or other official IFO review mechanisms prior to the IFO implementing or making a recommendation to the ICANN Board regarding the decision which is being challenged (implementation). As such the IFO will advise all directly involved parties of any decisions which can be reviewed under this Policy. Such decisions will be labelled Preliminary Decisions and will advise the concerned parties of their options for Reviewing such decisions.
- After reaching a decision on a ccTLD request which can be Reviewed, the IFO will advise those parties who could apply for a CCRM of the Decision and of their options for Reviewing the Decision as well as the timeline for doing so.
- If a Decision is being Reviewed under the CCRM, the IFO cannot take any action with respect to its decision prior to the CCRM Manager confirming it can do so.

- Will make all relevant internal materials available to the Reviewer(s) who will be under a formal confidentiality agreement. These will include all internal emails on the matter and all communications from all the relevant parties but does not include formal legal advice to the IFO.
- Will make itself available to the Reviewer(s) to present details of the case or answer questions.
- If the IFO fails to comply with the requirements of the Review policy the CCRM Manager will advise the ICANN CEO and the ccNSO Council of the situation and request that the ICANN CEO promptly correct the situation. In cases where the IFO fails to respond to a request by the CCRM Manager within the time period specified in the policy, the review process will be suspended until such time as the IFO properly responds to the request.

Please see Annex B of this document for more details.

5. Reviewing and updating the policy

Should the ccNSO Council decide that there have been significant changes to ccNSO policies which are covered by this policy or to the ISO 3166 standard, the ccNSO will launch a formal review of the CCRM policy to assess if it needs to be modified to align with any such changes. If the review of the CCRM policy finds that it needs to be modified, the Council shall launch a process to accomplish this.

6. Oversight

This Policy is directed at ICANN and the IFO as the entity that performs the IANA Naming Functions with respect to ccTLDs.

This Policy is not intended and shall not be interpreted to amend the way in which ICANN interacts with the IFO and the delineation of their roles and responsibilities.

This Policy will not change or amend the role that the ICANN Board of Directors has, which is understood to be limited to a review to ensure that the IFO (staff) has followed its procedures properly, with respect to individual cases of ccTLD Delegation, Transfer, Retirement, Revocation, or any other policy developed by the ccNSO and adopted by the ICANN Board which allows ccTLDs to appeal a decision by the IFO.

7. Stress Testing

7.1 Definition of Stress Testing

Stress Testing is defined as:

- Test the process as developed by applying the process to “corner case” situations to understand whether such a case results in an unwanted outcome or side effects.
- If the outcome of that situation results in an unwanted outcome or side effects adjust Policy/Process as needed.

After completion of the draft process the Stress Testing was conducted through answering the following questions:

- What is the outcome of this situation when the process is invoked?
- Is the outcome of that situation/the result unwanted or are side effects unwanted/unacceptable?
- Does the Policy/Process need to be adjusted/refined?

7.2 Identified Situations Where Adjustment/Additional Work May be Needed

None.

Please see Annex C of this document for more details.

8. Verification that the CCWG-RM Charter Questions have been answered.

- Which decisions and/or actions should be subject to a review mechanism?
 - This is answered in **section 3 Applicability of the Policy**.
- Whose decisions and/or actions should be subject to a review mechanism?
 - This is answered in **section 3 Applicability of the Policy**.
- Should a Review Mechanism be open and applicable to all ccTLDs?
 - The proposal is for a review mechanism which is available to all ccTLDs – details can be found in **section 3 Applicability of the Policy**.
- What will be the result / scope of the review decision?
 - This is answered in **section 4.1 Possible findings of the CCRM** and in **section 4.2 CCRM Process Overview**.

- What powers will be bestowed upon the review panel?
 - This is explained in **Annex B Detailed requirements of the parties directly involved in the CCRM** under the section Reviewers.
- Who will have standing at a review?
 - Only the IFO and the ccTLD Manager or applicants for a new ccTLD as explained in **section 3 Applicability of the Policy**.
- What are the grounds (for a review)?
 - This is answered in **section 4.1 Possible findings of the CCRM**.

9. Recommendations regarding ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii).

In July 2022 the ccNSO Council requested that the CCPDP3WG-RM look at the need for further clarification of the ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii), and, if in their view clarification is needed, make a recommendation to that effect.

The CCPDP3WG-RM makes the following recommendations regarding ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii):

- The CCPDP3WG-RM recommends that all disputes and claims related to the delegation, transfer, and revocation of ccTLDs shall remain excluded from ICANN’s Reconsideration Process and the Independent Review Process for Covered Actions.
- The CCPDP3WG-RM also recommends that all claims and disputes related to the retirement of a ccTLD shall be excluded from ICANN’s Reconsideration Process and the Independent Review Process for Covered Actions.
- The CCPDP3WG-RM recommends that the relevant section of the ICANN Bylaws shall be amended accordingly, including but not limited to amending the terms “delegation and re-delegation” to “delegation, transfer and revocation”. Amendment of the Bylaws is considered a matter of implementation.
- The CCPDP3WG-RM advises the ccNSO to consider that any future policy to be developed by the ccNSO and which can affect the stewardship of a ccTLD should include a consideration whether claims and disputes flowing from the application of the policy should be excluded from ICANN’s Reconsideration Process and the Independent Review Process for Covered Actions, and if so, explicitly specify the outcome of this consideration in any such policy.

10. Process to date

The CCPDP3WG-RM began its work on March 25, 2020 and met 58 times to date (as of ICANN 75 - September 20, 2022). This work included the participation of ICANN Legal staff at a number of these meetings.

The CCPDP3WG-RM presented updates to the community on its work at all ICANN meetings since ICANN 71, including seeking feed-back on the proposals from the ccTLD community at the ICANN 71, 74 and 75 sessions. Presentations to the community, including to the intersessional update in May 2021 and at ICANN75 to the GAC, can be found on the wiki-space of the CCPDP3WG-RM.

In developing the proposed policy, the WG began by working through the various review mechanisms available at the time and that could be relevant for the work of the group. These procedures ranged from the internal PTI escalation process to external procedures (Arbitrage). This exploratory phase was concluded in June 2020.

Starting in June 2020 the group reviewed the various decision points relating to the delegation, transfer, revocation, and retirement of ccTLDs. Goal was to identify those decisions that in the view of the WG may be subject to a review. The results of these deliberations can be found on the wiki space of the working group. This work was completed in January 2021.

In the next phase the WG focused on identifying the basic elements and principles for the review mechanism to be developed. This resulted in adoption of the basic principles or requirements that a review mechanism must meet (June 2021) as well as the various building blocks for the elaboration of review mechanism, ranging from rules and procedures for the review mechanism to governance fundamentals.

Note: this item will be updated after the policy is finalized.

11. References

- Domain Name System Structure and Delegation (RFC 1591), March 1994 -- <https://www.ietf.org/rfc/rfc1591.txt>
- ccNSO Delegation and Redelegation Working Group: Final Report on the Retirement of ccTLDs, March 2011 - <http://ccnso.icann.org/workinggroups/drd-wg-retirement-report-07mar11-en.pdf>
- Framework of Interpretation of Current Policies and Guidelines Pertaining to the Delegation and Redelegation of country-code Top Level Domain Names, October 2014 - <http://ccnso.icann.org/workinggroups/foi-final-07oct14-en.pdf>
- ISO 3166-1:2013, *Codes for the representation of names of countries and their subdivisions — Part 1: Country codes* - http://www.iso.org/iso/country_codes
- Response to the IANA Stewardship Transition Coordination Group Request for Proposals on the IANA Stewardship Transition from the Cross Community Working Group on Naming Related Functions, June 2016, Annex O: ccTLD Appeals Mechanism Background

and Supporting Findings, Sections 414-428 -

https://community.icann.org/download/attachments/53779816/FinalTransitionProposal_11June.pdf?version=1&modificationDate=1434047705000&api=v2

- Letter ccNSO Council to ICANN org re interpretation of ICANN Bylaws section 4.2 and 4.3 - <https://www.icann.org/en/system/files/correspondence/reynoso-to-eisner-21jul22-en.pdf>
- CCNSO Retirement policy ccTLDs as approved by the ICANN Board on September 21, 2022 at its meeting at ICANN 75 - (<https://ccnso.icann.org/sites/default/files/field-attached/board-report-proposed-policy-retirement-cctlds-17sep21-en.pdf>)
- Board Resolution adopting the ccNSO Retirement Policy - <https://www.icann.org/resources/board-material/resolutions-2022-09-22-en#2.c>

Annex A: CCRM Process Details

- The IFO makes a Decision regarding a ccTLD which is eligible for a CCRM.
- An eligible party for a CCRM submits an application (Application) for a CCRM to the CCRM Manager.
- The CCRM Manager confirms receipt of the Application and requests that the IFO take no further action regarding this decision until advised otherwise by the CCRM Manager¹⁰.
- The CCRM Manager evaluates the application (see application requirements in the Applicant/Claimant section):
 - If the CCRM Manager accepts the Application, it will:
 - Advise the Applicant (now Claimant) that the Application has been accepted.
 - Advise the IFO that the Application has been accepted and that the IFO may not proceed further with the Decision until informed otherwise by the CCRM Manager.
 - Update the CCRM website accordingly.
 - Will request that the Applicant select which type of Review it will opt for (CCRM Manager, 1 Reviewer, 3 Reviewers – see Reviewer section for details) and advise the IFO of this.
 - The CCRM Manager will work with the Applicant and the IFO to select the Reviewer(s). Once selected the CCRM Manager will launch the review.
 - If the CCRM Manager rejects the Application, it will:
 - Advise the Claimant that its application has been cancelled.
 - Advise the IFO of the rejection and that the IFO may proceed with this Decision.
 - Close the Application and update the CCRM website accordingly.
- Conducting the Review:
 - The CCRM Manager will manage the Review as the Reviewer(s) consider(s) the case:

¹⁰ Regardless of if the decision required Board approval.

- The Reviewer(s) may request a presentation by the IFO or ask formal questions of the IFO.
 - The Reviewer(s) will decide if there were significant issues or not and indicate this in their report (Report)
 - The CCRM Manager will evaluate the Report and work with the Reviewer(s) to ensure it is consistent with the requirements for such reports.
 - The CCRM Manager will publish the Report and advise the Claimant.
- If the Reviewer(s) did not find any significant issues:
 - The CCRM Manager will advise the Claimant, close the Review and advise the IFO that it may proceed with its Decision.
- If the Reviewer(s) did find significant issues:
 - The CCRM Manager will advise the Claimant of the findings and of the possible next steps.
 - The CCRM Manager will contact the IFO asking it to confirm which option it will take vs the Advice – the IFO will have 30 days to advise the CCRM Manager of its decision:
 - If the IFO responds within the 30-day deadline with one of the following options, the process can continue:
 - Accepts the Reviewer(s) decision and reverses its original Decision.
 - Accepts the Reviewer(s) decision but opts to re-do the evaluation of the request which led to the original Decision.
 - Rejects the Reviewer(s)' decision.
- If the IFO accepts the Reviewer(s) Advice and reverses its original decision:
 - The CCRM Manager will advise the Claimant and will close the case and update the CCRM website.
 - Note: This assumes that IFO Decisions are basically binary in most cases. Transfers, Revocations, requests for an extension in a retirement process, and Retirement of a 2-letter Latin non-ISO 3166-1 ccTLD can only be binary. Delegation of a new ccTLD between 2 contending parties is also

binary but is not if there are 3 or more applicants (which should be very exceptional).

- If the IFO rejects the Reviewer(s) decision:
 - If the IFO decision requires Board approval: The CCRM Manager will close the case and work with the IFO to ensure that the Advice is properly included in any IFO recommendation to the ICANN Board on this matter.
 - If the IFO decision does not require Board approval: The CCRM Manager will close the case and advise the ICANN CEO and the ccNSO Council of the situation and request appropriate action.

- If the IFO accepts the Reviewer(s) decision but opts to re-do its process with respect to this Decision:
 - Once the IFO has completed re-doing its process that Decision will be presented to the Claimant.
 - The CCRM Manager will request that the Claimant select one of the two following options and respond within 30 days:
 - Accept the new Decision.
 - Apply for a Review of this new decision at the IFO's expense (no charge to the Claimant).

 - If the Claimant accepts the new decision the CCRM Manager will close the case and update the CCRM website.
 - If the Claimant decides to apply for a new Review the Review process begins anew with the following changes:
 - If the Application for a Review is accepted the IFO will bear all costs.
 - If the Review finds significant issues with the new IFO Decision the IFO can only opt to accept the new Review decision and reverse its Decision or reject the Review's findings – the IFO will have 30 days to advise the CCRM Manager of its decision.

 - If the Review does not find any significant issues the CCRM Manager will advise the Claimant and the IFO and will advise the IFO that it can proceed with its Decision and close the case.
 - If the Review finds there were significant issues and the IFO reverses its Decision the CCRM Manager will advise the Claimant and close the case.

- If the Review finds there were significant issues and the IFO rejects the Advice:
 - If the IFO decision requires Board approval: The CCRM Manager will close the case and work with the IFO to ensure that the Advice is properly included in any IFO recommendation to the ICANN Board on this matter.
 - If the IFO decision does not require Board approval: The CCRM Manager will close the case and advise the ICANN CEO and the ccNSO Council.

Annex B: Detailed requirements of the parties directly involved in the CCRM.

- **The CCRM Manager - details not included in the process overview:**
 - The Manager must be a non-conflicted¹¹ individual who is an SME with a minimum of 20 years of experience with respect to ccTLDs, the IFO and ICANN and who will be responsible for overseeing and managing the Independent Advice system.
 - The office of the Manager will be funded and managed by ICANN.
 - General administrative responsibilities of the Manager:
 - Maintain an ongoing relationship with the ccNSO, IFO and ICANN. This includes monitoring Decisions by the IFO which have the potential to be reviewed.
 - Set up and oversee the operation of the website which will include:
 - General information on the Review process.
 - Q&A section.
 - All relevant forms.
 - List of certified Reviewers.
 - List of ongoing cases.
 - List of Review decisions.
 - List of past cases.
 - Prepare and manage the application of all relevant forms including:
 - Application/contract for a Review.
 - Application to become a certified Reviewer.
 - COI form for specific cases.
 - NDA for certified Reviewers.
 - Review decision form.
 - Fee agreements for Reviewers.
 - Billing forms for Reviewers.

¹¹ A conflict of interest is defined as anyone with a current “relationship” (business, financial or family) with a ccTLD, a known applicant for a new ccTLD, the IFO or who is pursuing legal action against these same parties. This would be assessed via a Conflict-of-Interest Declaration form (implementation).

- Set up a process to certify and manage Reviewers. This includes, but is not limited to:
 - Establishing criteria for the certification of Reviewers with the ccNSO and the IFO.
 - Managing the recruiting process for potential Reviewers.
 - Certification of Reviewers (validation as an SME, COI, NDA, contract).
 - Creation and management of a list of certified Reviewers.
- Manage financial matters including:
 - Review application payments and refunds.
 - Approval of Reviewer billing.
- **Reviewer(s) - details not included in the process overview:**
 - All Reviewers will be certified, managed, and supported by the Manager.
 - Reviewers will be paid for by ICANN/IFO.
 - Certification requirements will include:
 - Functional ability to work in English.
 - CV highlighting that the individual is a Subject Matter Expert (SME) with respect to CCNSO policies, RFC1591 and its FOI as well as IFO procedures. The minimum qualification will be 10 years of practical experience in all these areas (proposal TBD at implementation in cooperation between the Manager, the ccNSO and the IFO). Legal experience is also desirable.
 - Interview with the Manager to confirm SME status and ability to work in English.
 - Duly executed NDA regarding any non-public information obtained while acting as a Reviewer on any Independent Advice case.
 - Duly executed Reviewer contract with ICANN.
 - Duly executed COI form which will include certification of no COI with ICANN or the IFO. If selected for a specific case Reviewers will have to provide a formal confirmation that they are impartial with respect to the Claimant:
 - Conflict of interest is defined as a party having a “relationship” (business, financial or family) with

another party or who is involved in any formal legal action vs another party.

- Being a Manager or employee of a ccTLD registry will not be considered a COI vs ICANN or the IFO in this context unless there are significant pending issues between the parties.
- Choice of Reviewers by Claimants - 3 options for a review:
 - Review by the Manager only. This will be a minimal cost option only requiring the Administrative costs.
 - Review by one Reviewer selected jointly by the IFO and the Claimant from the list of pre-Certified Reviewers managed and maintained by the Manager. The selection process will be managed by the Manager and if the parties cannot agree on a single Reviewer within 30 days of the Application being approved, the Manager will select one from the list. The selected Reviewer will be required to formally confirm that it is impartial with respect to the Claimant.
 - Review by 3 Reviewers:
 - The IFO and the Claimant will each choose a Reviewer. The proposed Reviewers do not have to be from the list of pre-certified Reviewers. If the candidates are not from the list of pre-certified Reviewers, they will have to be certified by the Manager prior to undertaking any work on the case. Once certified the IFO and Claimant Reviewers will cooperatively pick a third Reviewer from the list of pre-certified Reviewers through a process managed by the Manager. If the two Reviewers cannot agree on a third within 30 days, the Manager will nominate the third from the list of pre-certified Reviewers:
 - The IFO and the Claimant must select their Reviewers within 30 days of the Application being approved. Failure to do so will cause the Manager to select a Reviewer for the party from the list of pre-certified reviewers.
 - If the chosen Reviewer is not pre-certified it will have to be Certified by the Manager within 30 days of being named before it can join the proceedings. If the chosen Reviewer fails to be certified prior to the deadline the party may

choose another if still within the original 30-day limit to choose a Reviewer.

- All Reviewers will be required to formally confirm that they are impartial with respect to the Claimant.
 - Any decision in a 3 Reviewer system will require the support of at least two of the three.
- Reviewers will only consider supplementary materials from the Claimant or the IFO if approved by the Manager. All such requests to submit additional material must be made using the appropriate form (implementation) and submitted to the Manager within 30 days of the request for Independent Advice being approved by the Manager. The Manager, using his best judgement for the fair administration of justice, will consider the following in determining if any new material should be accepted and made available to the Panel:
 - Is this material directly and critically relevant to the case?
 - Why was this material not included in the original request to the IFO?
 - Can hold individual teleconference hearings with all the involved parties.
 - Can request a presentation by the IFO on the matter under review. The Panel, at its discretion, can also request answers to its questions from the IFO which must respond promptly to these (2 business days (TBD at implementation with the IFO) California time following the day of the request – this should be included in the IFO SLE process statistics).
 - Definition of Significant Issues – Any clearly demonstrable inconsistency or deviation by the IFO of properly following its procedures and applying these fairly or how the IFO complied with the requirements of RFC 1591, the CCNSO FOI for RFC1591 as adopted by the ICANN Board as well as any other policies developed through a ccNSO policy development process and adopted by the ICANN Board in making its Decision which, in the opinion of the Reviewer(s), could have significantly impacted the IFO Decision.
 - The Reviewer(s)' Findings will explain in detail their conclusions.
 - The Manager will review the Findings from the Reviewers to ensure it meets all the requirements prior to publishing it. The Manager may work with the Reviewer(s) to amend the Findings to ensure it meets the requirements:
 - The Findings provides all the relevant administrative and background information.

- The Findings Findings will clearly indicate if there were any significant issues or not.
 - If there were Significant Issues the Findings shall clearly indicate what the issues are as well as why they are issues.
 - Formal sign-off of the Reviewer(s) on the Findings and a statement of majority opinion if necessary.
 - Findings from the Reviewer(s) cannot be appealed.
- **IFO - details not included in the process overview:**
 - Will maintain a good working relationship with the Manager.
 - Must amend its procedures to allow concerned parties sufficient time to file for a CCRM or other official IFO review mechanisms prior to the IFO implementing or making a recommendation to the ICANN Board regarding the decision which is being challenged (implementation). As such the IFO will advise all directly involved parties of any decisions which can be reviewed under this Policy. Such decisions will be labelled Preliminary Decisions and will advise the concerned parties of their options for Reviewing such decisions.
 - After reaching a decision on a ccTLD request which can be Reviewed, the IFO will advise those parties who could apply for a CCRM of the Decision and of their options for Reviewing the Decision as well as the timeline for doing so.
 - If a Decision is being Reviewed under the CCRM, the IFO cannot make a recommendation to the ICANN Board on the matter being reviewed prior to the Manager confirming it can do so.
 - Will make all relevant internal materials available to the Reviewer(s) who will be under a formal confidentiality agreement. These will include all internal emails on the matter and all communications from all the relevant parties but does not include formal legal advice to the IFO.
 - Will make itself available to the Reviewer(s) to present details of the case or answer questions.
 - If the IFO fails to comply with the requirements of the Review policy the Manager will advise the ICANN CEO and the ccNSO Council of the situation and request that the ICANN CEO promptly correct the situation. In cases where the IFO fails to respond to a request by the Manager within the time period specified in the policy the review process will be suspended¹² until such time as the IFO properly responds to the request.

¹² Suspension of the review process does not modify any other obligations of the IFO with respect to the CCRM policy. As such the IFO cannot proceed with any actions regarding the IFO

- **Applicant and Claimant - details not included in the process overview:**
 - Must be a ccTLD Manager except in the case of the delegation of a new ccTLD where any applicant for that new ccTLD is eligible.
 - To launch a CCRM, the Claimant must submit an application (Application) via the CCRM website to the Manager in English¹³ within 30 days¹⁴ of the Decision being made except if the Applicant has requested an IFO internal review or IFO Mediation. If the Applicant has used these other mechanisms, within 30 days of the Decision being made, it will be granted 30 days to apply for a CCRM after these processes are completed.
 - The evaluation criteria for a CCRM Application are:
 - Be on the properly completed form/contract (TBD)
 - Be received prior to the 30-day deadline¹⁵.
 - Clearly indicate which IFO Preliminary Decision is being Reviewed.
 - Not be for an IFO decision for which the Manager has applied for an IFO Internal Review or for IFO Mediation.
 - Not be for an IFO decision which is the subject of an active IFO Internal Review or IFO Mediation.
 - Not be for an IFO Preliminary Decision which has been accepted for a CCRM, is currently being Reviewed or has already been Reviewed.
 - Have paid the required fees (fees and details to be finalized at implementation).
 - Be a party listed in the IFO Decision that is a ccTLD manager listed in the IANA database or in cases related to the delegation of a new ccTLD any parties who applied to be the Manager for that ccTLD.
 - Clearly indicate the individual the Applicant has delegated to be responsible for the Application including all relevant contact information.
 - Clearly state why the Claimant believes that:

decision being reviewed.

¹³ All requests, templates, and documentation required for a CCRM must be in English. Where accuracy is essential, English documentation and/or English translations of key documents (such as governmental decrees relating to the request) must be notarised or certified as official translations,

¹⁴ 30 days to be calculated as follows – The IFO publishing its Initial Decision will be deemed Day 0. Day 1 will begin 1 minute after 23:59 UTC of Day 0. The opportunity to submit an application for an Independent Advice Review will expire on Day 30 at one minute past 23:59 UTC.

¹⁵ With the stated exceptions regarding the IFO Internal Review and IFO Mediation.

- That the IFO did not properly follow its procedures or applied these fairly in arriving at its preliminary decision; or
 - The IFO decision being reviewed is inconsistent with RFC 1591, the CCNSO FOI for RFC1591 as approved by the ICANN Board, as well as any other policies which apply to CCNSO members and is approved by the ICANN Board.
- For cases where there is a potential for more than one Claimant¹⁶. Should there be more than one application for the same IFO Preliminary Decision the Manager will accept the first application which meets all the eligibility criteria. Should there be a tie the Manager will choose which application will be accepted. In all such cases where the Manager has approved an Application for a Review, the Reviewer(s) will consider all elements of the IFO Decision for all potential Claimants.
 - By submitting an Application, the Claimant will agree to the rules for the Independent Advice Review, which will include a clause preventing the Applicant from taking the Manager, Reviewers, the CCNSO, or ICANN to court with respect to the Independent Advice Review (The Working Group recognizes that this in no way prevents the Claimant from taking the IFO or ICANN to a court with relevant jurisdiction regarding the Decision by the IFO and approval of this Decision by the ICANN Board).
 - The Manager may interact with the Claimant's contact person to obtain clarifications on the application (and may allow the Applicant to resubmit).
 - If the Manager rejects the application for an Independent Advice Review the Claimant's payment will be refunded minus administrative costs (implementation). There is no mechanism to appeal the Manager's decision to reject an application however the Manager will be required to publish the reasons for rejecting the application.

¹⁶ e.g. a Decision regarding the delegation of a new ccTLD which had three applicants – if the ccTLD is allocated to one of the three, the two others could appeal – obviously a corner case

Annex C: Result of Stress tests per identified situations

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Scenarios for stress testing the proposed CCPDP-RM mechanism:

- Retirement
 - Can a request for a change of Manager during a Retirement process, which is refused by the IFO, be reviewed by the CCRM?
 - Yes, although it is very rare for the IFO to refuse a decision the Retirement policy clearly states that a transfer can happen during a retirement process and the CCRM policy clearly states that it applies to all Transfer requests.
 - Can a ccTLD Manager request a CCRM of an IFO decision to retire its ccTLD?
 - Yes, in some specific cases. The Retirement policy only allows for the review of an IFO decision to retire a ccTLD if the ccTLD is a 2 letter Latin ccTLDs not corresponding to an ISO 3166-1 Alpha-2 Code Element¹⁷.
 - Can a ccTLD Manager request a CCRM if the IFO refuses to grant an extension as part of a Retirement process?
 - Yes, as stated in the Retirement policy.
- IFO does not respond
 - What happens if the IFO does not respond, within the delay specified by the policy to a request by the CCRM Administrator?
 - From the CCRM draft policy: *“If the IFO fails to comply with the requirements of the Review policy the Administrator will advise the ICANN CEO and the ccNSO Council of the situation and request that the ICANN CEO promptly correct the situation. In cases where the IFO fails to respond to a request by the Administrator within the time period specified in the policy the review process will be suspended until such time as the IFO properly responds to the request.”*
 - What happens if the IFO does not respect other requirements of the policy?
 - See the previous answer.
- Language

¹⁷ What was often referred to an “exceptionally reserved” code element.

- Can a ccTLD Manager apply for a CCRM in a language that is not English?
 - No. From the draft CCRM policy: “To launch a CCRM, the Claimant must submit an application (Application) via the CCRM website to the Administrator in English”.
- Terminology issues?
 - What happens if the issue between the Manager and the IFO is because of vagueness or ambiguity of terminology or differences in interpretation of policy or rules?
 - This is one of the key reasons for the creation of the CCRM policy. The CCRM ensures that an independent and knowledgeable reviewer will provide advice on the IFO decision. Specifically, the draft CCRM policy states:

“The Independent Advice Review (CCRM) will only provide advice on whether or not:

 - *There were significant issues with the IFO properly following its procedures and applying these fairly in arriving at its Decision; or*
 - *There were significant issues in how the IFO complied with RFC 1591, the CCNSO FOI for RFC1591 as adopted by the ICANN Board, and any other policies developed through a ccNSO policy development process and adopted by the ICANN Board in making its Decision.”*
 - Could a change of terminology in ISO 3166 impact a Manager’s eligibility for a CCRM or impact a CCRM review?
 - It is difficult to imagine such a situation however, to ensure the CCRM policy is future-proof the policy includes the following language: *“Should the ccNSO Council decide that there have been significant changes to ccNSO policies which are covered by this policy or to the ISO 3166 standard, the ccNSO will launch a formal review of the CCRM policy to assess if it needs to be modified to align with any such changes. If the review of the CCRM policy finds that it needs to be modified, the Council shall launch a process to accomplish this.”*
- Name server issues
 - Can a ccTLD Manager use the CCRM to review IFO refusals to change that ccTLD’s authoritative nameservers¹⁸ in the Root Zone?

¹⁸ An authoritative name server is a name server that gives answers in response to questions asked about names in a zone. An authoritative-only name server returns answers only to queries about domain names that have been specifically configured by the administrator. Name servers can also be configured to give authoritative answers to queries in some zones, while acting as a caching name server for all other zones.

- No, this is out of scope for this policy as the policy is meant to deal with the change of Manager issues. Nameserver issues can be dealt with via the BAMC and other applicable policies or procedures.
- Other issues
 - How can the CCRM handle competing applications for the same IFO decision?
 - . We note that this situation is highly unlikely. This being said, the draft CCRM policy addresses this issue as follows:

For a CCRM application to be accepted the draft policy states that:

“Not be for an IFO Preliminary Decision which has been accepted for a Review, is currently being Reviewed or has already been reviewed.”

And

“For cases where there is a potential for more than one Claimant. Should there be more than one application for the same IFO Preliminary Decision the Administrator will accept the first application which meets all the eligibility criteria. Should there be a tie the Administrator will choose which application will be accepted. In all such cases, where the Administrator has approved an Application for a Review, the Reviewer(s) will consider all elements of the IFO Decision for all potential Claimants.”

- Can an application for a CCRM be made at the same time, or during, an internal IFO review for the same IFO decision?
 - No, the draft CCRM policy states that a CCRM application must:

“Not be for an IFO decision for which the Manager has applied for an IFO Internal Review or for IFO Mediation.

And

Not be for an IFO decision which is the subject of an active IFO Internal Review or IFO Mediation.

- ”

- Can there be a CCRM if the IFO has lost all contact with the Manager for that ccTLD?
 - No, the draft CCRM policy is clear that only the Manager of a ccTLD which is affected by an IFO decision can apply for a CCRM.
- Can someone other than the Manager (back-end registry provider, DNS operator...) apply for a CCRM?
 - See previous response.

- Can CCRM findings for a given review apply to other cases including past IFO decisions?
 - No. CCRM findings only apply to the case that was considered.
- In the context of a ccTLD retirement how is unreasonably withheld defined?
 - This term does not appear in the draft CCRM policy however, it is included in the ccNSO Retirement policy:

“ Section 4.4.... Granting an extension to the Default Retirement Date is at the discretion of the IFO and shall not be unreasonably withheld. The Reasonable Requirements Document that the IFO will have included with the Notice of Removal will describe the factors it will consider when evaluating a request for an extension to the Default Retirement Period..... If the request for an extension is rejected and the ccTLD Manager believes that the rejection is unreasonable or is inconsistent with the Reasonable Requirements Document, it may appeal the decision by the IFO (see Section 5.2 of this Policy).”

The term “unreasonably withheld” is a well-understood legal concept. This means there is a presumption that the extension will be granted unless the IFO presents convincing reasons why it should not be. Additionally, this will be considered in the implementation of both the Retirement and CCRM policies.

Item #	Situation	Result	Relevant section Policy and / or other document if any	Adjustment if any
I				None
ii				None
iii				None
iv				None
v				Need to include specific mechanism targeting Retirement
Vi				None
vii				None
viii				None

Item #	Situation	Result	Relevant section Policy and / or other document if any	Adjustment if any
ix				None
x				None
xi				None
xii				None
xiii				None
xiv				None
xv				None
xvi				See footnote 2 Section 1.2

Annex D: Overview of the terminology (Uncertain we need this section for this policy)

Annex E: Community Comments on Interim Paper (to be added once the public consultation is completed)

TITLE: ccNSO PDP3 Initial Proposals for Process to Retire ccTLDs		
Section I: General Overview and Next Steps		
<i>Purpose:</i>		
<i>Current Status:</i>		
<i>Next Steps:</i> After closure of the Public Comment period, the Working Group will review the comments received and take into account in developing a final set of Policy recommendations.		
Section II: Contributors		
<u>Organizations and Groups:</u>		
Name	Submitted by	Initials
<u>Individuals:</u>		
Name	Affiliation (if provided)	Initials
Summary of Comments, References to Interim Paper, WG Response		
<i>General Disclaimer:</i> This section intends to summarize broadly and comprehensively the comments submitted to this public comment proceeding but does not address every specific position stated by each contributor. The preparer recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).		

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