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Registrar Stakeholder Group

Registrar Stakeholder Group Comments on the Operational Design Phase Concept Paper

The Registrar Stakeholder Group (RrSG) thanks ICANN for the opportunity to provide further comments on the draft Operational Design Phase concept paper.

We'd like to first recognize the potential for significant improvements and enhancements to the process that currently exists with respect to how ICANN internalizes and reviews the impact of policy recommendations on ICANN's operations, and how these are ultimately reported to the ICANN Board for consideration. We believe that looking at how policy recommendations will correlate with the operational capabilities of ICANN is of great importance and should be factored into ICANN's thinking in terms of implementation sooner rather than later in the policy development process.

With respect to the latest revisions made by ICANN to the concept paper, we think ICANN has done a good job in addressing community concerns. The RrSG would like to offer additional thoughts for ICANN to consider as it further revises the concept paper and/or as the ODP evolves.

Firstly, while recognizing the difficulties involved, the RrSG remains concerned that the ODP offers an opportunity for matters addressed in a PDP to be relitigated or otherwise opened for alternative or misleading interpretations. While it may never be possible to fully alleviate such concerns, ICANN's engagement with the community during an ODP could and should be documented and be as transparent as possible to avoid unintentionally finding itself touching upon substance that was either already addressed in the PDP and/or otherwise best left to the GNSO for handling.

Second, ICANN should make clear in the concept paper whether the ODP is geared specifically at ICANN (and not contracted parties) in terms of operational impact. This is generally understood to the be case, but an explicit recognition of this would be useful. If the RrSG is wrong in its assumption, then ICANN should clarify its intent and focus of assessing operational impact.

Thirdly, the RrSG recommends that ICANN reflect on the matter of "timing" in the concept paper. To be more specific, the concept paper should articulate how long the process would take and recognize that the intention of the ODP is not to add unnecessary time or otherwise delay the process of considering and implementing policy recommendations.

Lastly, the RrSG would like to caution against a single GNSO liaison to the ODP, as such a role could be a burden on a single individual in terms of time and expertise. An alternative could be a small and nimble group within the GNSO that pulls from PDP experts and the GNSO liaison to the PDP in question. The intent of this approach is to ensure that the requisite expertise is available and shared among a small group of people in a manner that is efficient and fair.

Thank you very much for your consideration of the above views and recommendations. The RrSG welcomes and looks forward to further discussion on the ODP.

Regards,

Ashley Heineman
RrSG Chair
(on behalf of the RrSG)