Maureen Hilyard
ALAC Chair

Dear Maureen:

I am writing to share with you the views of the ccNSO Council on the ICANN71 session *At-Large Policy Session 2: ccTLD Governance Models - Testimonies from At-Large End Users*.

The ccNSO Council appreciates all opportunities to regularly engage with ALAC and the At-Large community, to explain how ccTLDs are managed and operate, and clarify and discuss possible ccTLD matters to the extent of our mandate. ALAC should read the following considerations in that context.

After the closure of each ICANN public meeting, the ccNSO Meeting Program Committee (MPC) reviews and evaluates relevant sessions for the ccTLD community. Concerning the At-Large session, the substantive feedback was:

- Why did ALAC want to talk about ccTLDs in general and about aspects of the governance of specific ccTLDs (as was initially proposed) in particular? This is, first and foremost, a local matter of the significantly interested parties in the ccTLD related country or territory.

- We were puzzled by some testimonials. Some presenters, not associated with a ccTLD, explained how a specific ccTLD works in their view and, unfortunately, they were not factually correct. This had to be corrected during the session. In the future, should ALAC wish to learn more about the ccTLD environment and/or any specific ccTLD, we strongly recommend they hear it directly from the ccTLD operators.

- Our understanding was that the session's goal was to share the end-user experience with their ccTLD, i.e. specifically, the role of end-users in the governance of their ccTLD and not about DNS abuse. For this reason, and to provide a sound basis for comparison, Katrina Sataki provided an overview of the various factors to compare models and experience. We noticed that specific end-user testimonials spoke about their perception of possible issues of ccTLDs based in another geographic area of what was on the agenda. Some ccTLDs were accused of allowing severe criminal activity to occur. On top of that, a ccTLD was wrongfully accused.

The ccNSO Council shares the substantive concerns of the MPC regarding the ICANN71 session *At-Large Policy Session 2: ccTLD Governance Models - Testimonies from At-Large End Users*, as expressed by the ccNSO MPC during its ICANN71 wrap-up meeting.

Recently, the Council also received a letter from the falsely accused ccTLD Manager, and therefore, we listened to the recording of the session. This confirmed that:

a) ccTLDs were mixed-up (the wrong ccTLD was identified), and

b) the accusation should not have been directed at a ccTLD Manager but to a registrant, who allows 3rd level registrations.

From the recording, we also understand that the issue raised was already addressed by the relevant ccTLD Manager a couple of years ago. Although the presenter apologized during the session in the chat, we believe that a public correction is needed to ensure that both ccTLD managers are cleared of any false accusations.

Looking forward, I want to share on behalf of the ccNSO Council some additional observations on the process of how this session was organized.

Firstly, we learned just before its scheduled date that ALAC had the intention to organise a session on *Public Interest: Is the commercialization of ccTLDs a threat?* Consequently, we reached out to you to share our concern on the lack of communication and that the initially proposed session would potentially be very contentious for no good reason. We appreciate that with only two weeks before the session, the topic was changed to *At-Large Policy Session 2: ccTLD Governance Models - Testimonies from At-Large End Users*.

Secondly, as preparation of the revised session had to be rushed, we expressed our concern about the lack of time to prepare the session appropriately. Presenters learned only a few days before the session what they were supposed to talk about, and the role of the testimonials remained unclear. ICANN virtual meetings have taught us that preparation time is more important than ever to ensure smooth sessions that meet their objective. In addition, presenters should be known and briefed accurately. This is, in our view and experience, a critical factor for an interesting and engaging session.

Although the ccNSO Council is always looking for opportunities to collaborate, our primary responsibilities are towards the members of the ccNSO and broader ccTLD community. Therefore, to avoid any future misunderstandings and frustrations on both sides, if the ccNSO is asked to participate in sessions on ccTLDs at ICANN72 or any subsequent meeting, we will only participate under the following conditions:

1. Preparations should start at least six weeks in advance.
2. Content perspective should be careful and respectful to foster the understanding of ccTLDs and how they operate.
3. All relevant parties should be involved in the organizing process.
4. Sessions should focus on the agreed goal of the session and follow the agreed agenda and format.

To reiterate, the ccNSO Council greeted the *At-Large Policy Session 2: ccTLD Governance Models - Testimonies from At-Large End Users* as an opportunity to engage with ALAC and will welcome any future friendly interaction to clarify and discuss possible issues and questions any constituency/stakeholder may have about ccTLDs.

Best regards,

Alejandra Reynoso
ccNSO Chair