

from the adopted [ATRT3 recommendation](#) for a “Holistic Review,” described on pages 5-6:

ATRT3 chose not to address for some or all of the reasons listed above a number of items listed below. ATRT3 hopes that these can be considered in a future **Holistic Review**, ATRT Review or other relevant process:

The Expedited Policy Development Process (EPDP) in response to the Temporary Specification enacted by the ICANN Board in response to (GDPR). ATRT3 is concerned about the accountability and transparency of the GNSO policy development process when considering the EPDP as it relates to data protection.

The accountability and transparency issues related to Domain Name System abuse.

- **Accountability and transparency concerns around ICANN org not providing a clear rationale relative to its enforcement of DNS abuse provisions in their agreements with contracted parties.**
- **Accountability concerns relating to ICANN’s negotiated agreements with contracted parties, specifically regarding DNS abuse, and their alignment with respect to ICANN’s mission, commitments, and core values.**

The ATRT3 recommendations included these Objectives for the **Holistic Review**, on page 22:

- Review continuous improvement efforts of SO/AC/NC based on good practices.
- Review the effectiveness of the various inter-SO/AC/NC collaboration mechanisms.
- Review the accountability of SO/ACs or constituent parts to their members and constituencies (this will include an in-depth analysis of the survey results).
- **Review SO/AC/NC as a whole to determine if they continue to have a purpose in the ICANN structure as they are currently constituted or if any changes in structures and operations are desirable to improve the overall effectiveness of ICANN as well as ensure optimal representation of community views** (but taking into consideration any impacts on the Board or the Empowered Community).