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AT-LARGE ADVISORY COMMITTEE

At-Large Statement on Phase II of Public Comments Process Enhancements

Introduction

By the Staff of ICANN

Carlton Samuels, At-Large Advisory Committee (ALAC) member from LACRALO, originally composed this statement.

A first version of the ALAC Statement on Phase II of Public Comments Process Enhancements was posted on the [At-Large workspace](#) on 21 September 2011. On the same day, a call for comments was sent to the ALAC-Announce mailing list.

As no comments were received, the present document will be used for the ALAC ratification process.

On 21 September 2011, Olivier Crepin-Leblond, Chairman of the ALAC, requested the At-Large Staff to begin a five day ALAC vote starting 26 September 2011 and closing 30 September 2011.

[End of Introduction]

The original version of this document is the English text available at <http://www.atlarge.icann.org/correspondence>. Where a difference of interpretation exists or is perceived to exist between a non-English edition of this document and the original text, the original shall prevail.

ALAC Statement on Proposed Phase II Process Enhancements

ATRT Recommendations

For the At-Large to exercise its responsibilities as effective guardians of the public interest in ICANN's multi-stakeholder policy development process, a pervasive and multi-faceted knowledge dissemination operation is fundamental to its success. Adequate knowledge of the policy development and implementation process must be backstopped by timely information disseminated in multiple forms and via as many channels as are suited for unfettered access and assimilation by the lowliest of us. In support of this principle, the ALAC is on record and was first out the box in advocating multilingual access to all forms of information as well as the information processes pertinent to every ICANN policy development channel. On principle, the ALAC deems a Public Comment policy and structured process to implement as a major portion of the information and knowledge dissemination framework so important to effective representation.

The At-Large presumes equity in influencing ICANN policy development as a non-negotiable objective and a cornerstone of the multi-stakeholder model of names and numbers governance. We note here that the ALAC has always expressed its disquiet on the existing situation when advice is delivered to the Board; a lack of a prescribed process to acknowledge receipt and, official feedback on its utilization or intent to use. The ALAC is unanimous that a change here is both desirable and necessary. On principle then, the ALAC is unperturbed in its commitment to the implementation of initiatives for continuous improvement in information flows, its quality, accessibility and effective consumption.

The ALAC cannot account divergent views from those distilled in the truisms declared above. So on principle, we support every mechanism, initiative and action intended to produce fuller and better information sufficient to realize easy and immediate access to relevant information to energize effective contributions by the At-Large to the ICANN policy development process and implementation operations, all in the public interest. In this context, the ALAC comments affirming its support for the twenty-seven recommendations for improvement made by the Accountability and Review Team (ATRT) are of record. Recommendations #15 – thru #21, inter alia and in particular, addresses the principles for information dissemination and sharing to which we are subscribed.

The ALAC fully supports the ATRT's Recommendations #15 through #17 which speaks to the Phase II issues of the stratification and prioritization of topics. In the main, we are unanimous that these matters are linked and co-related, especially in furtherance of the objectives for which information must be generated and shared. We are unanimous that the Public Comments/Reply to Public Comments cycle is desirable and as structured, represents significant improvement on the existing practice. And while we generally favour the Implementation Plans as proposed by Staff for these recommendations, we however would wish, in context, to note some concerns:

Staff Recommendation for Implementation of Prioritization System

We are sympathetic to Staff's concern on the risks for inducing 'tunnel thinking' that a staff-led prioritization of policy issues might initiate. However, we believe sufficient safeguards in developing and disseminating the background information to each policy issue can be exercised to minimize this risk. We urge that this issue be revisited and strongly recommend further consultations with the community in this area.

Staff Recommendation for Implementation of Public Comments/Reply to Public Comments cycle

We are unanimous that a structured comment cycle is both necessary and desirable. However some subject matters require more time to air and digest than others. And given the publication logistics challenges faced from time to time and the steep learning curve that some matters present for the diverse global At-Large community, we believe that the adoption of a fixed duration for this cycle is inimical to the global public interest. On these bases, the ALAC cautions establishment of a rigid timeline for the Comment/Reply To Comment cycle without an opportunity to vary, depending on circumstances. The ALAC therefore recommends that a provision for adopting a variable duration for comments/Reply To Comments be considered and implemented.

The ALAC is willing and available to work with Staff in smoothing all of the connected implementation plans and look forward to continued engagement as they move forward.