The At-Large Advisory Committee is concerned by the Board's response to the rising levels of attention given conflict of interest matters both inside and outside the ICANN community. We are troubled by the possible impacts on ICANN's credibility as a steward of the multi-stakeholder model of Internet governance and the sustainability of that model in the global environment, especially in light of clear and present threats.

In our view, ICANN must seize this moment to right itself by adopting and applying the language of the Affirmation of Commitments with respect to conflicts of interest. Indeed, in its explanatory text for rejecting all of the proposals - including one from ICANN - for managing IANA affairs, the United States Department of Commerce describes a "need for structural separation of policy-making from implementation, a robust companywide conflict of interest policy, provisions reflecting heightened respect for local country laws and a series of consultation and reporting requirements to increase transparency and accountability to the international community." Their message is unmistakable and we believe this warning should be heeded by ICANN.

While recently attracting widespread attention, this issue of Conflict of Interest is not new to the At-Large Community, where it has been extensively discussed. As a reminder, the ALAC's previous advice regarding this matter is detailed in Statement AL/ALAC/ST/0911/3, found at:
https://community.icann.org/download/attachments/27852981/Revisions+to+Conflicts+of+Interest+Policy+and+Bylaws+to+Allow+Board+to+Consider+Compensation+for+Director+Services.pdf?version=3&modificationDate=1317694494000

While many in our community appreciate the urgency and importance of the issue as expressed in ICANN CEO Rod Beckstrom's recent speech in San José, there is concern that an extreme application of his proposed remedies would cause serious damage to ICANN's carefully designed multi-stakeholder model. We believe that all stakeholders indeed have a place in ICANN decision making, but that the current implementation has led to serious imbalances which lead to a situation which, today, falls well below the standards which the Internet user community expects from ICANN.

The ALAC therefore files this present Statement as an "advance notice" that a fuller, more extensive Statement will be filed prior to the end of the comment period incorporating the "reply" period, with the advance proviso that the current documents under scrutiny constitute a mild improvement on prior conflict of interest documents, but are far from satisfactory in view of other industry common practice.