The ALAC and At-Large Community of ICANN, has long been a champion for the needs analysis and effective use of interpretation and translation services by ICANN and should be considered (we believe) as a 'extensive or 'power user' / client of these services as an integral part of our routine ICANN internal and At-Large outreach activities. We further note that recommendation #9 as outlined in the Final Report of the ALAC Review Working Group on ALAC Improvements (14 June 2009) is specific **" ...9. ICANN should strengthen its translation and interpretation processes"** (page 6) and that there were further recommendations were made relating to 'translation services' / tools:

(From page 18 of the Report and in support of Recommendation 22 of the independent Consultants 2008 Westlake Report)

> 3.2.2.6. Translation and interpretation The WG strongly supports the need for efficient, effective translation and interpretation processes in ICANN. At least as much as any other group in the ICANN community, efficient, effective translation is critical to the success of the ALAC. The translation system needs to be far more reliable than it is at present. Establishing clear accountabilities (including some form of Service Level Agreement) with staff and contractors is crucial if higher standards are to be developed and maintained. The WG recommends that the Board ask staff to review the efficiency and effectiveness of current translation practices with a view to implementing better translation processes and increasing funding to provide a wider range of translation services. This is an area where ICANN should strive for continuous improvement.

ALAC appreciates the considerable work that has clearly gone into the preparation and presentation of the DRAFT – ICANN Language Services Policy and Procedures under current public review, as a next step in the evolution of these essential services to a Global Multi-stakeholder Organizations from the then pivotal work of 2008 which resulted in the 'Translation Program' ; as well as the opportunity to make some substantive comments upon this Draft of an ICANN's Language Services Policy and Procedures.

Firstly the ALAC and At-Large agree with ICANN's provision of a cost-effective provision (though we do hold great interest in being involved in the establishment of the ROI measures for this) of high quality multilingual services with the objectives to:

- Make information about ICANN and its work accessible to those who speak languages other than English in ways that enhance participation in and the effectiveness of the multistakeholder model; and
- Make ICANN more effective as a global organization.

We also appreciate the full gamete of ICANN's language services being identified as now including:

- Translation

- Simultaneous interpretation
- Teleconference interpretation
- Transcription (of recoded sessions)
- Scribing (Real Time Transcription - RTT)

All of which our community makes extensive and continuing use of (although at this stage RTT use is limited to ICANN public meetings we do see a developing opportunity for its use regionally and in our outreach and education programs)

ALAC and At-Large support the stated goal of the 'Language Service Policy (LSP) to provide us with "...high quality, consistent, timely and cost-effective services, reflecting current usage of technical terms by native speakers." ; as well as the longer term vision to offer by end 2015:

- Translation and interpretation, either automatically or on request;
- In the six official United Nations languages. Criteria for granting exceptions (either to provide additional of fewer translations) will be explicitly spelled out;
- For all core documentation, main public meeting sessions, and select Supporting Organization and Advisory Committee conference calls; and
- In five abridged versions of the English website, focusing on the core elements.

Noting that our community will no doubt be one that from time to time and specific to stated purpose requests ADDITIONAL languages beyond the 6 official UN ones (e.g. need for Portuguese text in documents used in parts of our LACRALO area etc.,)

And we most certainly endorse ICANN creating a "...a comprehensive quality control process and adoption, where appropriate, of best practices..."

The ALAC appreciates the importance of an effective and efficient Language Service Policy for an international organization using a multistakeholder model, as ICANN does. Moreover, we further appreciate that sectors within the ICANN community will use and benefit from this provision of services more or less depending upon geography and need. An example of how important it is to a significant number of Internet end users and domain name registrants is exemplified in the work done by our Latin American and Caribbean Islands Regional At-Large Organization (LACRALO), with the specific review and comments on the draft Language Services Policy which ALAC has received and is delegated to append as written.

We appreciate the initiatives and services rendered by ICANN in this respect so as to promote broader and inclusive community participation at ICANN's policy development. For our regular outreach work at the regional level (with more than 23 languages on the EU level only) it is desirable to have more **key** documents translated in other languages

than the six official UN ones; however translating key documents into more than 6 UN languages would help to spread the message for local ALS organizations and foster a much better understanding of processes and policies for ICANN leaders and allow to participate more actively. As far as interpretation (meetings, teleconferences and transcripts) is concerned, translation is an important means to an end but not a goal – besides the internationalization and diversity – itself.

Recently ALAC and At-Large activities have specifically benefited from the improvements in the provision of Language Services (LS) as outlined in the LSP that have resulted in a considerable improvement (and associated gain in our productivity and better policy development work practices) in both quality and efficiency but we could add CONSISTENCY to the list of recent improvements and benefits.

Specific to Translation:

We also recognize the **current limitations** of electronic tools and technologies available for our use, but do wish to insist that ICANN must keep a close watching brief (and perhaps even develop tools or be a 'beta tester') for improvements in this arena; and we do endorse the proposal to develop and conduct "...a multilingualism awareness program for current and new staff. Board members, staff and community members will sometimes be asked to help monitor the quality of translations. A translation management system allows language service providers to access previous translations, improving quality and streamlining the process...." We also appreciate the recognition that we have an extensive wealth of 'community skills and talent' that can contribute in appropriate and predictable ways to the improvements to and development of a holistic LSP to serve ICANN's community and Mission. Further the split into 'Proactive Translation' and 'On Demand' materials is welcomed and will give both guidance and clarity to our community in what it can 'expect' from ICANN's Language Services and will be an aid to our own planning processes as the basis for a decision to translate is now well defined.

 Specific to Interpretation:

ALAC and the At-Large community particularly appreciate and endorse the LSP recognition of the need to local language provision i.e. that there might be offered interpretation at these meetings in languages relevant to the host country and region. As well as the note that streaming of live sessions and interpretation issues is being addressed. We also appreciate the formal listing of the excellent support we enjoy already with the Language Services team assisting us with Interpretation at our teleconferences, as a section of the Draft ICANN LSP.

ICANN will typically provide interpretation for conference calls where a significant number of participants are French or Spanish speakers, such as ALAC and RALO meetings. **The number of participants required for this service should be determined by ALAC in coordination with Staff on a meeting-by-meeting basis as necessary.**

We are delighted and heartened to see that the LSP will also focus on the very important matter of Video Subtitling and would expect our community to make considerable use of this feature of future video material produced, as well as the detailed attention given to the LSP's 'Quality Control' and 'Validation Review Cycle' planning and offer our members services and support in any way that can assist with this part of the proposed ICANN Language Services programs and the proposed Language Services Policy Review in FY2014.

LACRALO

LACRALO's Paper on the Draft Language Services Policies and Procedures Document published on May 18th, 2012

June 4th, 2012

Introduction

On May 18th, 2012, ICANN's Language Services Department published the Draft Language Services Policies and Procedures paper.

The paper was developed in six phases:

1. A draft report was presented for initial consultation and feedback from the Translations Committee and ICANN senior executives on January 30 2008, and a public comment period was held in March 2008.

2. A full time translation coordinator was hired on December 15 2008.

3. Guidelines for language services providers and standard approaches to technical terms and acronyms were developed in March 2009.

4. An initial language services budget was created in FY2011; the first comprehensive language services budget was implemented in FY2012.

5. A second public comment period will be held in May 2012.

6. The Board Committee on Public Participation will submit the policy to the ICANN Board with its recommendation in September 2012.

As implicit in its title, the document is intended to establish policies and procedures related to all language services - translation, simultaneous interpretation, teleconference interpretation, transcription (after-the-fact audio files) and scribing (Real Time Transcription, RTT).

It is in the same direction and continuing with our commitment to participate and assist the development of ICANN policies, that in 4 th June 2012, Sergio Salinas Porto, ALAC Member by LACRALO submitted for public comments within the region, a document to be adopted as the LACRALO statement and will sent it to ALAC for discussion under the principle of bottom-up. Once the public comment period was finished, we are sending this document where LACRALO makes its contribution in this draft document which contribute with the valuable and essential multilingualism and multi-stakeholder model.

LACRALO's Paper on the Draft Language Services Policies and Procedures Document published on May 18th 2012

The At-Large LACRALO community commends all and every effort made by ICANN to provide language services intended to facilitate access to ICANN and participation in its work for those who do not speak or are not fluent in English.

These services are essential to achieve excellence within ICANN's multistakeholder model.

We agree with the draft document on the fact that meetings, documents and information must be available in multiple languages, since this enables many Internet end users to learn about issues addressed by multiple constituencies, as well as to express their views and make their voices heard beyond common forums where Internet end users express their views collectively.

 We understand that language services are not only in the interest of the target population, but also increase ICANN's effectiveness and significant impact as a global organization immersed in society.

We are aware that this also creates genuine and equitable involvement opportunities, especially for Internet end users from developing Spanish or French speaking countries who had no access to higher education and to a language other than their mother tongue.

This should be taken into account when speaking about language services, an international organization and a multistakeholder model.

We agree that English is ICANN's working language.

The policy should entail the provision of translation and interpretation services in the six UN languages - currently, Arabic, Chinese (Simplified), English, French, Russian and Spanish - as needed.

Necessary resources must be allocated to this end.

We understand that it is important for us to be able to communicate in meetings and teleconferences, as it is also important to have translation services into the UN languages available as part of ICANN's common practices. This enables the multiplication of documents that will be subject to debate, as well as documents that have already been approved. In turn, this renders an outreach tool readily available to the entire ICANN community.

We agree with the draft document that "If the UN amends its official languages, ICANN will consider whether to adopt the change." We see this as a very good sign of wider diversity within ICANN.

Language Policy Vision

In line with the Language Services Department, we understand that "…The goal of the Language Services Policy is to ensure that ICANN operates as a highly effective global organization, providing high-quality, consistent, timely, and cost-effective services, reflecting current usage of technical terms by native speakers." Also, we understand the Language Services Department's long-term vision that, by the end of calendar year 2015, ICANN will offer translation and interpretation automatically or on demand.

• in the six official United Nations Languages. Criteria for granting exceptions (either to provide

additional or fewer translations) will be explicitly spelled out.

• for all core documentation and documents to be addressed by constituencies with members speaking a language other than English, main public meeting sessions, and Supporting Organization and Advisory Committee conference calls.

•in five abridged versions of the English website, with a focus on its main components and sections that are subject to public debate.

We commend the initiative of having a complete and updated Internationalized Domain Name, translation and online definition glossary. It pleases us to see the English glossary is in alphabetical order, which is still not the case in the remaining languages foreseen on the web site (http://www.icann.org/general/glossary.htm).

As regards translation, and in line with our previous considerations, core documents, as well as documents subject to public debate or used to provide advice, should be a translation priority, so as to increase expediency and fairness in the engagement and participation of Internet end users.

In the case of teleconference interpretation, the requirement of having a minimum of three (3) speakers in need of interpretation has been met to date.   Spanish and French speaking community members suggested lowering that threshold to two (2) speakers. We ask that this suggestion be taken into account, as it would ensure the engagement of different regions in several teleconferences with the aim of helping the Internet community.

In those cases where simultaneous teleconference interpreting were not possible, we would welcome the call transcripts in French and Spanish.

As regards electronic translation tools applied to e-mails, we believe these tools are not advanced enough to produce consistently accurate, high-quality translations. LACRALO is a significant example, where electronic translation tools have hindered, rather than enabled, the comprehension of messages in both languages. Therefore, we expressly recommend that the use of these tools should be interrupted until there is an alternative that will guarantee a minimum standard of acceptable translations.

We see a significant step forward in that ICANN will consider the translation of a document into any language other than the six UN languages (with a sufficient rationale).

We feel positive and optimistic about the creation of a Multilingualism Awareness Program, and about the invitation to community members to help monitor the quality of translations.

We also feel positive about a web-based platform to manage the validation review cycle, which will bring about noticeable performance and development improvements in this area.

The above suggestions and views are submitted for their debate and adoption.