

## Global Domains Division - Consensus Policy Implementation Framework (Draft)

I. **Goals and Objectives:** This Consensus Policy Implementation Framework (CPIF) is designed to support predictability, accountability, transparency, and efficiency in the Consensus Policy implementation process.

### II. Working Principles:

- A. Implementation of policies shall be completed in a transparent process throughout the implementation lifecycle. Communications—between the Policy and GDD teams, to the Implementation Review Team and the GNSO Council, and to the broader community—are a central component of the implementation lifecycle from beginning to end.
- B. ICANN Staff strive to follow the letter and the intent underlying GNSO Consensus Policy recommendations when designing implementations and transforming Consensus Policy recommendations into Consensus Policies. Staff will be accountable to the GNSO Council (or its agent, such as an implementation review team) for ensuring that the implementation of policies is consistent with the policy recommendations and the reasoning underlying the policy recommendations. Where there is uncertainty surrounding the intent underlying a policy recommendation, staff will consult with the IRT to clarify that intent.
- C. ICANN staff will evaluate all Consensus Policy recommendations at the outset of implementation, using the Consensus Policy Implementation Framework. This evaluation process will include a checklist created by ICANN staff to ensure that all steps are followed during each implementation phase before contracted parties must physically implement a Consensus Policy.
- D. The implementation process must ensure that the integrity of Consensus Policy recommendation(s) is maintained as these are transformed into implementable processes, systems, and standards.
- E. The implementation process must enable staff to plan and manage the capacity and resources required to package, build, test, and deploy a release into production and establish the service(s) and support structure.
- F. ICANN staff will define a formal transition process (GNSO Policy Team to GDD, GDD implementation, and GDD to Compliance checklists) for use by project sponsors as each new CPIF project is executed.
- G. Policy implementation activities should follow a life cycle according to standardized implementation phases or windows. To support contracted parties' implementation efforts, the policy implementation activities should be coordinated as much as possible according to deployment cycles and implementation deadlines, taking into account factors such as other related activities or events with conflicting or simultaneous timelines.
- H. Any change or release that is required due to immediate security and stability issues will be deployed in an expedited manner, per Consensus Policies and temporary policies specifications within the Registry Agreement and Registrar Accreditation Agreement. In such cases, ICANN staff will collaborate with the community and consider throttling back on other implementations in the pipeline to ease the burdens of emergency changes.
- I. ICANN staff will continually review the CPIF and its documentation to encapsulate additional best-practices or to adjust the steps as a result of lessons learned with previous Consensus Policy projects.

### III. Roles and Responsibilities

- A. GNSO Council: The GNSO Council is responsible for developing and recommending to the ICANN Board substantive policies relating to generic top-level domains. Once policies are adopted by the Board, the GNSO serves as a resource for staff who have questions about the background

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**Comment [1]:** ICANN staff supports additional consideration and input from the P/I working group on this topic.

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or intent of the policy recommendations during its implementation. The GNSO may continue to provide input on the implementation of a policy, for example, if the GNSO believes that the implementation is inconsistent with the policy.

- B. GNSO Policy Staff: The Policy staff support the GNSO in its policy development activities. As such, the Policy Staff are responsible for handing off GNSO policies for implementation to the GDD staff once the policies are approved by the Board. Policy staff can also serve as a resource for GDD staff should questions arise surrounding the intent or history of a policy recommendation.
- C. Global Domains Division (GDD) Staff: The GDD staff are responsible for the entire implementation lifecycle, from creating an implementation plan, engaging the Implementation Review Team (if there is one), consulting with relevant ICANN staff and any outside parties that are required, and conducting outreach surrounding the implementation, including communicating with the public and relevant stakeholders regarding the progress of implementation.
- D. Implementation Review Team (IRT): The Implementation Review Team, if convened by the GNSO Council, will serve as a resource to implementation staff on policy and technical questions that arise. An IRT will typically consist of, but will not be limited to, volunteers who were also involved in the development of the policy recommendations. As such, the IRT is expected to serve as a resource to staff on the background and rationale of the policy recommendations and return to the GNSO Council for additional guidance as required. Where relevant, the IRT should also include technical or subject-matter experts and contracted parties who can assist staff in the planning for the technical implementation of a policy change.
- E. ICANN Supporting Organizations and Advisory Committees: SO/ACs may serve as a resource to ICANN staff during implementation as specific projects require.
- F. General Counsel's Office: Legal staff will review all amended policy language to ensure the changes are legally sound and that amendments will not create issues under any other policies or contracts.
- G. Contractual Compliance: Contractual Compliance staff is involved in the implementation lifecycle to ensure that changes are implemented in a manner that creates clear and enforceable obligations on contracted parties (and also in a way that is efficiently tracked and enforceable for compliance).
- H. Enterprise Risk Management: Enterprise risk management staff will review the policy advice, the implementation plan, and amended policy language and/or new services to evaluate associated risks.
- I. Third-Party Service Providers: Contractors who will carry out, offer, and/or support a service at ICANN's direction. These contractors may be expected to provide recommendations on the feasibility of certain approaches or assist with proposed solutions to issues raised during implementation.

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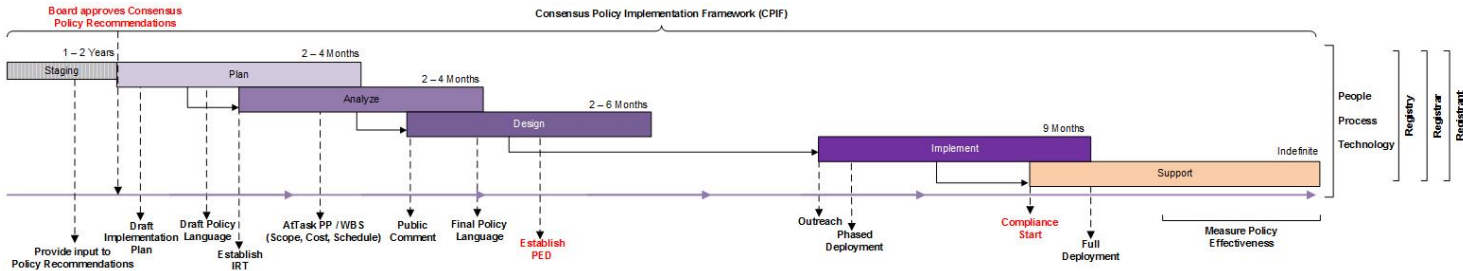
**Comment [2]:** Staff notes a comment from Chuck Gomes regarding the importance of including contracted parties during the implementation of Consensus Policy Recommendations. Staff welcome the P/I WG's feedback on ways to increase contracted parties' participation on implementation review teams.

As an example, there is little RrSG participation in the current Thick Whois IRT. How could staff improve participation by contracted parties during implementation to ensure that their interests are adequately represented?

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#### IV. Consensus Policy Implementation Framework (CPIF) (time ranges are estimated)



- **Staging:** is the process of early engagement in policy development activities. Consideration and feedback to policy work products and consensus policy recommendations as it relates to implementation will occur through the various phases of the GNSO Policy Development Process.
- **Plan:** is the process of thinking about and organizing the activities required to achieve a desired goal. A project plan with complete work breakdown structure is the primary output; including a draft requirements document.
- **Analyze:** is the process of breaking a complex topic or substance into smaller parts to gain a better understanding of it. In addition to a complete requirements document, the final consensus policy language are the formal outputs to this phase.
- **Design:** is the creation of a solution or convention, if needed, for the construction of a system or service. A formal implementation plan is the primary output of this phase that includes requirements thoroughly vetted and tested.
- **Implement:** is the realization of an executed plan, application or service. Given the critical systems status, rigid change and release management protocols should be used to maximize success and minimize impact. Phased deployments and rollback procedures should be required.
- **Support:** is the stage where the system or service operates in a steady-state mode. It is continually assessed to ensure it does not deviate from design. Compliance of the newly adopted consensus policy is also introduced in this stage.

V. CPIF Primary Milestone Checklist

Phase	Step	Responsible	Requirements
STAGING	Provide input on staff Preliminary Issue Reports	GDD staff	Designated GDD staff member will monitor Policy staff's creation of Issue Reports and provide input on behalf of the team(s) as appropriate.
STAGING	Follow policy development projects with an eye toward implementation	GDD staff	Designated GDD staff member will monitor PDP activities with an eye toward implementation issues. The staff member(s) will participate in PDP discussions as required to share an implementation perspective.
STAGING	Provide input on GNSO PDP Initial Report	GDD staff	Designated GDD staff member will coordinate the teams' input on the GNSO PDP initial report.
STAGING	Provide input on GNSO PDP Final Report	GDD staff	Designated GDD staff member will coordinate the teams' input on the GNSO PDP Final Report.
STAGING	Provide input on GNSO recommendations to ICANN Board Report and/or Staff Recommendations Report to ICANN Board	GDD staff	Designated GDD staff member will coordinate the teams' input on WG materials to prepare the ICANN Board with their consideration of the Consensus Policy recommendations and other SO/AC advice where necessary.
PLAN	Conduct GNSO Policy Team to GDD Implementation team turnover	GNSO Policy staff, GDD staff	Once the Board passes a resolution, the Registry/Registrar Services teams will designate a staff member to lead implementation. This GDD staff member will coordinate with GNSO Policy staff to complete the policy to implementation handoff. At handoff, GDD assumes responsibility for reporting and communicating on project status.
PLAN	Recruit Implementation Review Team (if applicable)	GNSO Policy staff, GDD staff	GNSO Policy staff, in consultation with GDD staff, will issue a call for IRT volunteers and create a listserv for the IRT.
PLAN	Create draft implementation plan	GDD staff	GDD staff will define the project deliverables and will create a draft implementation plan—including milestones, target dates, and descriptions of issues to be addressed--to present to the IRT, starting with a project plan template and making modifications as needed to accommodate the project.

PLAN	Create draft Consensus Policy language (if applicable) and service requirements (if applicable)	GDD staff, GCO	When a PDP requires changes to an existing consensus policy or the creation of a new consensus policy, GDD staff will create a draft consensus policy language proposal to kick off implementation discussions.  When policy recommendations requires the creation of a new service or changes to an existing service, GDD staff will also create draft requirements for systems and third party engagement for new/changed services.
ANALYZE	Engage Implementation Review Team	GDD staff, GNSO Policy staff, <a href="#">in consultation with IRT</a>	GDD staff will convene one or two ad-hoc sessions to establish agreement on the rules of engagement and deliverables of the IRT, and create the IRT's meeting schedule.  Draft consensus policy language should be distributed to the IRT and call(s) should be held to clarify or improve the language consistent with the intent of the policy recommendations.  <i>Note: The role and working of IRT is also actively under consideration by the P &amp; I WG and any recommendations coming out of that effort that are approved by the GNSO Council will be factored in here.</i>
ANALYZE	Engage additional third parties as may be needed for implementation (service providers, technical experts, etc)	GDD staff, <a href="#">in consultation with IRT</a>	If the implementation will require changes to existing services or the building of a new service, the implementation lead should consult service providers and tech experts as early as possible to ensure that these viewpoints are included from the outset of the implementation. This process could include issuing a RFI or RFP.
DESIGN	Solicit public comment on proposed policy language and implementation plan (if applicable)	GDD staff, <a href="#">in consultation with IRT</a>	GDD staff will decide whether the proposed implementation should be posted for public comment (there is a strong presumption that items will be posted for public comment). If so, the proposed consensus policy language and/or details of the new service as well as the implementation plan will be posted for public comment.
DESIGN	Draft final policy language (if applicable)	GDD staff, <a href="#">in consultation with IRT</a>	GDD staff will adjust policy language based on public comments, in consultation with the IRT (if applicable).
DESIGN	Finalize new proposed service (if applicable)	GDD staff, <a href="#">in consultation with IRT</a>	GDD staff will finalize new proposed service based on public comments, in consultation with the IRT (if applicable) after consulting with relevant service providers.

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DESIGN	Consult with IRT and relevant staff regarding draft final policy language and/or new proposed service	GDD staff, <a href="#">in consultation with IRT</a>	The GDD staff will consult with relevant staff (as needed) and the IRT ( <a href="#">or GNSO in cases where there is not an IRT</a> ) on final policy language and/or service.
DESIGN	Solicit additional public comments, if required	GDD staff	If the final policy language and/or proposed service is materially changed following the initial public comment period, the GDD staff will seek public comments on the updated language/service before it is implemented.
DESIGN	Finalize policy language and/or new service	GDD staff, <a href="#">in consultation with IRT</a>	Once all relevant staff, service providers and the IRT have reviewed the final policy language/service, the final product should be announced to the public and to relevant stakeholders.
DESIGN	Establish Policy Effective Date	GDD staff, <a href="#">in consultation with IRT</a>	Define a reasonable date in which contracted parties can implement changes to become compliant with the intent of the Consensus Policy.
IMPL	Announce Policy Effective Date	GDD staff	<p>A proposed policy effective should already have been scheduled/published, but this marks the formal milestone.</p> <p>Formal legal notice, as required under the Registry and Registrar Accreditation Agreements, should be provided to contracted parties.</p> <p>Notice should be emailed to the contracted parties and posted on the ICANN website in the “consensus policies” section.</p>
IMPL	Develop education and outreach materials	GDD staff	GDD staff will coordinate with Communications create any materials needed for socializing the policy changes across the contracted parties and general internet community. Items include webinars, FAQs, online documentation, service/compliance requests, etc.
IMPL	Conduct outreach	GDD staff	GDD staff will schedule a series of webinars to educate affected stakeholders on the pending policy changes (if needed).
IMPL	Send reminder notices	GDD staff	Reminder notices about the upcoming Policy Effective Date should be sent to contracted parties 30 days before the effective date and on the effective date.
IMPL	Deploy Consensus Policy change	GDD staff	This represents a milestone rather than a task. The draft implementation plan, any requirements docs, and/or AtTask project plans should contain a detailed schedule of sub-tasks and details associated with its execution.

SUPPORT	Initiate Compliance monitoring & enforcement based on PED	Compliance	This marks the formal opening of the Policy Effective Date. Contractual Compliance should be fully prepared to respond to any enforcement activities and able to take a proactive approach to monitoring for compliance.
SUPPORT	Continuous improvement & measure of policy effectiveness	All	Measurement of the Consensus Policy effectiveness is important to understand if the policy changes met the objectives defined by the GNSO. A series of metrics should be defined and created to measure the policy as required across the contracted parties or ICANN services.
SUPPORT	Policy status report	Compliance, GNSO Policy Staff	Compliance and GNSO Policy Staff should provide a report to the GNSO Council when there is sufficient data and there has been adequate time to highlight the impact of the policy recommendations, which could serve as the basis for further review and/or revisions to the policy recommendations if deemed appropriate.

VI. Appendix A – GNSO Policy Development Process

<http://gns0.icann.org/en/basics/consensus-policy/pdp>

**GNSO Policy Development Process**  
 \*Summarized

\*Some steps omitted, for brevity.

