

ATRT Implementation Project, Recommendation 15

Project Information:

15. The Board should, as soon as possible but no later than June 2011, direct the adoption of and specify a timeline for the implementation of public notice and comment processes that are distinct with respect to purpose (e.g. Notice of Inquiry, Notice of Policy Making) and prioritized. Prioritization and stratification should be established based on coordinated community input and consultation with staff.

ATRT proposed project deadline: ASAP but no later than June 2011

Project's Lead Department: Stakeholder/Policy

Project Manager: Filiz Yilmaz

Project Team Members: Representatives from Stakeholder/Policy, Communications, Legal, and Project Office

Project Manager/Team Advice:

Staff recommends that the Board adopt this recommendation with modification of the due date. The need for this modification is explained below.

Many improvements can be made to ensure that the Public Comment Notices are clear, understandable and provide sufficient information in plain language so that interested parties can decide quickly and easily which topic they want to follow and comment upon.

Stratification: Staff performed an initial assessment of public comment forums over the last two years and notes that the topics are extremely varied and do not fit neatly into common categories, such as a Notice of Inquiry or Notice of Policy Making. Further consultation with the ICANN community will be required in order to develop a more standardized categorization linked to ICANN policy and procedures. Staff recommends that additional research be conducted, a stratification list be developed internally and via a Focus Group some community members are asked for feedback on this list. At the end of this process, staff can propose a public comment forum stratification list that can be posted for public comment for wider community input. This stratification work may be assisted by the categorization work identified in response to ATRT Recommendation 6 (on distinguishing between policy and staff functions).

Prioritization: Solicitations for public comments at ICANN typically cover a broad array of topics of interest to diverse stakeholders, but most are very important to some sub-set of the ICANN community. Staff should not be placed in a position of deciding on the importance or priority of one public comment request over another, as this is neither appropriate nor useful to a broad and diverse community.

Staff recommends that necessary improvements in the re-design of Public Comment Pages are made so that the reader makes the prioritization decision themselves without explicit mention of it as a data token.

The current page is hard to read, displaying all open, closed and archived public comments in one page. They lack of standardization in both content and presentation, navigation is not clear and the page designs are cluttered, resulting in lack of focus (e.g., Open vs. Closed) and too much content replication (e.g., background/history).

Staff recommends that the ICANN Public Comment web page be re-designed for clarity of the display by means of standardization of both content and presentation (supported by new Staff templates), clear navigation, clean page designs, each page singularly focused (e.g., Open, Recently Closed, Upcoming) and minimizing the content duplication.

It should be noted that the implementation of a Language Service Policy may affect the implementation timeline for this recommendation.

Preliminary Plan for Implementation:

Staff proposes a two-phase deployment for a successful implementation of this recommendation. Phase 1 focuses on more immediate changes that can be made, while Phase 2 contains improvements that will take more time to implement due to the complexity of the tasks involved.

Phase 1:

Task 1: The Sr Dir Participation and Engagement will work with other staff to implement a new coordination and clearance process if the required resources (1 additional FTE) are provided. The level and depth of this coordination and clearance effort will depend heavily on the resourcing and support received. An “ICANN Internal Public Comment Process” document, will be created to provide clear guidance on how public comment forums should be started, carried out, and concluded by both ICANN Staff and by the other stakeholders (ICANN Board, SOs, ACs).

Task 2: A new template will be created for opening a public comment forum to collect and post the necessary information. By using this template, all essential information will be collected to ensure a clear and concise notice is posted on the ICANN Public Comment web page.

Task 3: A new summary template will be created to ensure that the “summary and analysis” that is posted at the conclusion of all public comment processes by the responsible ICANN Staff meets the communities’ needs.

Task 4: ICANN Staff guidelines and best practices for the processing of comments will be developed.

Task 5: Initial Re-design the ICANN Public Comment web pages is nearly complete. Basic improvements include:

- Direct attention first to the current Open issues: Public Comment landing page opens with the list of “Open Public Comments” at a given time.

- Links point to other Public Comment categories such as Upcoming Public Comments (ATRT recommendation 21), Recently Closed Public Comments and Archived Public Comments.
- Little or no page scrolling is required
- Each Public comment forum box follows a standardized key data elements with minimized content duplication and display key info links that are easy to find and are placed in standard location
- Each Announcement page for each public comment follows standard sections for consistency and thoroughness

Task 6: Staff conducts further research and develops an appropriate stratification list, collects feedback internally on the list.

Task 7: Staff works to form a Focus Group for an initial consultation on the stratification list.

Phase2:

Task 8: Feedback from the Focus Group is incorporated.

Task 9: Stratification list goes out for a Public Comment period for wider community input, together with the other elements of the implementations required by ATRT recommendations 16-17.

Task 10: Re-design ICANN’s Public Comment web page based on inputs received.

Proposed Timeline:

Phase 1: (Most tasks in Phase 1 can be performed simultaneously.)

End of June 2011 - Tasks 2 - 5 (mainly templates and the guidelines for Staff and the re-designed Public Comment Webpages) will be completed.

End of August 2011 – Task 6 -7

Execution and completion of Task 1 depends on the resourcing.

Phase 2: (Tasks in Phase 2 are more time consuming and they have external dependencies requiring consultation and coordination.)

End of December 2011 - Task 8-10 are estimated to be completed.

Proposed Resources:

Staffing: 6 FTEs will need to devote at least 20% to 40% of their time to this implementation plan within the proposed timeline above.

If the improved ICANN Internal Public Comment Process is put in place, additional resources will be needed for oversight and maintenance. It is estimated that one new FTE support for the Sr Dir Participation will be required for the continuing management and coordination of the Public Comment Process.

For the project management support from a Policy Consultant the cost is estimated to be \$20,000.

Key Consultations:

Internal Executive Team and Staff, Board and Public Participation Committee, SOs and ACs, ICANN Community via Focus Group and Public Comment