



# PUBLIC COMMENTS DATA ANALYSIS REFRESH

Period: January 2010-June 2014

## 4) Overall Conclusions

The following sections summarize findings that can be deduced from this data analysis as well as statements indicating where further research is needed.

### A. Original ATRT1 Recommendations

#### Recommendation #15: Stratification and Prioritization

No data was collected that would enable assessing the effectiveness of having introduced a categorization<sup>7</sup> scheme for each Public Comments topic. Similarly, prioritization was handled by providing community members supplementary fields such as context, next steps, et al. Additional research would be needed to determine the benefit of these measures, possibly employing a survey instrument or focus group.

#### Recommendation #16: Comment-Reply Cycles

As initially reported in May 2013, the extended data set continues to show that the Reply Cycle is not being utilized as originally envisioned. After examining the submissions for each solicitation from January 2013–June 2014 and appending that data to what had been reported from March 2012–December 2012, fully 75% of replies were determined to be original comments submitted after the deadline. That figure is up 4% compared to the May 2013 data analysis. The average number of adjusted Replies continued to hover at approximately **1.0** per solicitation and **80%** of all solicitations during that period received 0 or 1 Replies after data cleanup.

Staff determined mid-way through 2014 that the Reply Cycle should be suspended. That decision is supported by this extended data analysis, which shows that the preponderance of Replies are simply late submissions forwarded after the original Comment Period closed. See Section C (below) for further information concerning Public Comments revisions taking effect in January 2015.

#### Recommendation #17: Timelines

No data was collected to determine whether or not fixed minimum timeframes for Comment and Reply periods have impacted any dependent variables relating to Public Comments efficiency, effectiveness, or participation<sup>8</sup>.

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<sup>7</sup> It should be noted that, after some redevelopment work on Public Comments, the categorizations approved as part of ATRT1 are no longer being displayed on the ICANN website.

<sup>8</sup> Independent of this data analysis, Staff is aware that some community members have requested that the length of time for Comments (Avg=32 days) and Replies (Avg=21 days) be extended beyond the current levels.



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The analysis has determined that the overall length of solicitations has increased by 15 days (see Section 3-C, Chart 3) attributable to the addition of a Reply Cycle averaging 23 days while having only shortened the original average comment period (40 days) by 8 (23-8=15). There is no evidence, based upon the data analyzed from 2010-2012, that lengthening the entire period by just over two weeks has resulted in any measurable change to the response or participation rate.

## Recommendation #21: Upcoming Topics

No data was available for analysis that would help assess the extent to which forecasting and publishing [Upcoming Topics](#) has been beneficial to community members.

To evaluate the value and benefit of this particular enhancement would require additional research, possibly incorporating a survey instrument or focus group.

## **B. Other Findings and Conclusions**

### Participation Levels

As initially reported in May 2013, the median number of total comments posted was **6** before the ATRT1 enhancements were implemented in 1Q 2012 and **5** thereafter (see Chapter 3-C, Chart 5). There is no supporting quantitative evidence that community participation levels have been materially affected by any of the changes introduced as a result of ATRT1 enhancements.

## **C. Enhancements Related to ATRT2 Recommendations**

A second ATRT team ("ATRT2") was commissioned in Feb 2013 and released its final report to the ICANN Board on 31 December 2013 which constituted a review of ATRT1's recommendations as well as new elements not considered by the original team. Two recommendations (#7.1, #7.2) dealt specifically with Public Comments and were addressed in a plan submitted to ATRT2 by David Olive, Sr. Vice President-Policy Development, on 25 February 2014. Subsequently, that plan took the form of the following four short-term recommendations summarized below, which were approved for implementation after review with SO/AC leaders in May 2014:



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No.	Brief Description	Rationale/Explanation
1	Suspended "Reply Cycles"	A data analysis covering 4.5 years of Public Comments has not supported the effectiveness of Reply Cycles which were added in January 2012 as a result of recommendations from ATRT1. The original Data Analysis Report published in May 2013 and confirmed by the most recent data refresh <sup>9</sup> , shows that the number of Replies to Public Comments solicitations since implementation has averaged approximately <b>1.0</b> ; moreover, 64% of all solicitations received no qualified Replies and 16% received only one Reply. Staff's conclusion was to suspend Reply Cycles effective with this change and follow up in approximately six months to evaluate the effectiveness of this process revision.
2	Introduce minimum 40-day comment period default target	Given the elimination of the 21-day Reply Cycle (see #1 above) and responding to the frequently expressed community concern that there is often an insufficient amount of time to produce substantive responses to Public Comments, the new "default" target comments period is lengthened to 40 days. Setting shorter periods is possible with the approval of two ICANN Staff Global leaders. Comment periods <u>longer</u> than 40 days are, of course, acceptable.
3	Reinforce clear deadlines for Staff Summary Reports	The deadline for Staff Summary Reports has been 2 weeks since January 2012; however, a new policy requires management escalation if a report is not published within the allotted timeframe and no advanced communication is received requesting a delay due to extenuating circumstances. The ICANN web page for each Public Comment solicitation will prominently depict the status of each proceeding from comment opening to the posting of the Staff Summary Report.
4	Implement Staff Summary Report community inquiry protocol	The ATRT2 specifically recommended that, "The Board should establish a process ... where [participants] can request changes to the synthesis reports in cases where they believe the staff incorrectly summarized their comment(s)." Working with our IT and development colleagues, Staff has introduced a simplified protocol through which a community member may submit an inquiry, through the Public Comments website, for subsequent review, analysis, and disposition by Staff.

<sup>9</sup> Still under management review; expected to be published in January 2015.