OCTOBER 2015 JONES DAY/ICANN LEGAL EDITS AND COMMENTS TO THE SECOND DRAFT PROPOSAL AoC BYLAWS LANGUAGE (REDLINE PREPARED BY ADLER & COLVIN)

~~SECOND DRAFT PROPOSAL~~

~~**Mission, Commitments, and Core Values**~~

ARTICLE I: MISSION AND CORE VALUES

Section 1. MISSION

1. The ~~Mission~~mission of The Internet Corporation for Assigned Names and Numbers ("ICANN") is to coordinate, at the overall level, the global Internet's systems of unique identifiers, and in particular to ensure the stable and secure operation of the Internet's unique identifier systems~~.~~ (“Mission”). In particular, ICANN:

    a. Coordinates the allocation and assignment of the three sets of unique identifiers for the Internet, which are

        (i) Domain names (forming a system referred to as "DNS");

Internet protocol ("IP") addresses and autonomous system ("AS") numbers;

        (ii)and

        ~~(ii)~~(iii) Protocol port and parameter numbers.

    b. Coordinates the operation and evolution of the DNS root name server system.

    c. Coordinates policy development reasonably and appropriately related to these technical functions.

2. In ~~this role~~furtherance of its Mission, with respect to domain names, ICANN’s ~~Mission~~role is to coordinate the development and implementation of policies:

a. For which uniform or coordinated resolution is reasonably necessary to facilitate the openness, ~~interoperability~~interoperatiblity, resilience, security and/or stability of the DNS; and

b. That are developed through a bottom-up, consensus-based multistakeholder process and designed to ensure the stable and secure operation of the Internet's unique ~~names systems.~~ name system.

3. In ~~this~~ furtherance of its Mission, ICANN's role~~,~~ with respect to IP addresses and AS ~~numbers, ICANN's Mission~~Numbers is described in the ~~ASO MoU between ICANN and RIRs.~~ Address Supporting Organization Memorandum of Understanding approved on 26 August 1999, as amended.

4. In ~~this~~ furtherance of its Mission, ICANN's role~~,~~ with respect to protocol port and parameter numbers~~, ICANN's Mission~~ is ~~to~~ [*to be provided by the IETF*].

5. In ~~this~~ furtherance of its Mission, ICANN's role~~,~~ with respect to the DNS root server ~~system, ICANN's Mission~~systems is ~~to~~ [*to be provided by the root server operators*].

6. ICANN shall have no power to act other than in accordance with, and as reasonably appropriate to achieve ~~its Mission. Without in any way limiting the foregoing absolute prohibition, ICANN shall not engage in or use its powers to attempt the regulation of services that use the Internet's unique identifiers, or the content that they carry or provide.~~ , its Mission.[1]

~~Commitments and Core Values~~

[1] Note to ICANN: The second sentence should be made part of the Mission, Commitments or Core Values if it is going to be implemented, it should not be tacked on to the general prohibition. Additionally, the second sentence's inclusion could be read by some to imply that ICANN cannot enforce its existing contractual rights.

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Section 2. COMMITMENTS & CORE VALUES

~~7.~~1. In ~~carrying out~~performing its Mission, ICANN will act in a manner that complies with and reflects ICANN's Commitments and respects ICANN's Core Values, both ~~described below.~~as described below, in each case, except to the extent that ICANN's compliance with any Commitment or Core Value could result in ICANN taking actions outside its Mission.[2]

~~8.~~2. Commitments~~-~~:

~~1.~~ In performing its Mission, ICANN must operate in a manner consistent with ~~its~~these Bylaws for the benefit of the Internet community as a whole, while carrying out its activities in conformity with ~~relevant principles of international law~~ applicable domestic and international ~~conventions, and applicable local law~~ law [and through open and transparent processes that enable competition and open entry in Internet-related markets~~.~~].[3] Specifically, ~~ICANN's action must:~~the following Commitments should guide the decisions and actions of ICANN:[4]

a. ~~2. Preserve~~Preserving and ~~enhance~~enhancing the neutral ~~and judgment free~~ operation of the DNS, and the operational stability, reliability, security, global interoperability, resilience, and openness of the DNS and the Internet;~~-~~[5]

[2] Note to ICANN: The CCWG dropped reference to security and stability. This should either be added as the first Commitment or be added here so as to make it paramount over all other Commitments and Core Values.

[3] Note to ICANN: This bracketed text may be challenging.

[4] Note to ICANN: Revised to be more grammatically correct as the focus should be on how ICANN acts rather than the "action". Also revised to refer to applicable domestic and international law rather than "relevant principles of international law and international conventions and applicable local law" for simplicity and to avoid the inclusion of human rights through referencing international conventions. The lead-in to the list is consistent with the CCWG's recommended lead-in to the Core Values.

[5] Note to ICANN: "Judgment free" is vague and ambiguous (i.e., even a neutral decision requires some judgment). The inclusion of "neutral" should cover this issue.

b. ~~3. Maintain~~Allowing ICANN to maintain the capacity and ability to coordinate the DNS at the overall level and to work for the maintenance of a single, interoperable Internet;

c. ~~4. Respect~~Respecting the creativity, innovation, and flow of information made possible by the Internet by limiting ~~ICANN's~~ICANN's activities to matters that are within ICANN's Mission and require or significantly benefit from global coordination;

d. ~~5. Employ~~Employing open, transparent and bottom-up~~,~~ multistakeholder policy development processes, led by the private sector~~,~~ (including, without limitation, business stakeholders, civil society, the technical community~~,~~ and academia), that (i) seek input from the public, for whose benefit ICANN shall ~~in all events~~ act, (ii) promote well-informed decisions based on expert advice, and (iii) ensure that those entities most affected can assist in the policy development process;[6]

e. ~~6. Make~~Reaching decisions by applying documented policies consistently, neutrally, objectively, and fairly~~, without singling out any particular party for discriminatory treatment;~~ and in accordance with the requirements of Article II, Section 3 of these Bylaws;

f. ~~7. Remain~~Remaining accountable to the Internet ~~Community~~community through mechanisms ~~defined~~contained in ~~the~~these Bylaws that enhance ICANN's effectiveness.

~~9.~~3. Core Values~~:~~

[6] Note to ICANN: "in all events" was deleted because it may not be understood by non-native English speakes, and deletion does not change the meaning.

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~~1.~~ In performing its Mission, the following ~~core values~~Core Values should also guide the decisions and actions of ICANN:[7]

a. ~~3.~~ Delegating coordination functions to or recognizing the policy role of other responsible entities that reflect the interests of affected parties and the roles of both ICANN's internal bodies and external expert bodies;[8]

b. Seeking and supporting broad, informed participation reflecting the functional, geographic, and cultural diversity of the Internet at all levels of the ICANN community's policy development and decision-making processes in an effort to ensure that the bottom-up, multistakeholder policy development process is used as the means to ascertain the global public interest, and that those processes are transparent and accountable ~~and transparent;~~to the global Internet community;[9]

c. ~~4.~~ Depending on market mechanisms to promote and sustain a ~~healthy~~ competitive environment in the ~~DNS market.~~ registration of domain names;[10]

d. ~~5.~~ Introducing and promoting competition in the registration of domain names where practicable and beneficial ~~in~~to the public interest as identified through the bottom-up, multistakeholder ~~policy~~ development process~~.~~;[11]

e. ~~6. Operate~~Operating with efficiency and excellence, in a fiscally responsible and accountable manner and, where practicable, at a

[7] Note to ICANN: Consider whether the Commitments and Core Values should be structured similarly (i.e., general lead in for Commitments followed by specifics; Core Values just has specifics).
[8] Note to ICANN: Consider whether it is appropriate to keep the "to the extent feasible" limitation here.
[9] Note to ICANN: The addition seems duplicative of Commitment (d).
[10] Note to ICANN: The addition of "healthy" is vague and ambiguous. Consider whether the "feasible" limitation should be retained (or a variation, like "practicable and beneficial to the public interest"). Limited to "registration of domain names" to limit potential mission creap, or the ability of third parties to argue that ICANN's mission extends to all aspects of the DNS market.
[11] Note to ICANN: Addition is duplicative of Commitment (d), but is also probably harmless.

speed that is responsive to the needs of the global Internet community~~.~~;[12]

f. ~~7.~~ While remaining rooted in the private sector~~,~~ (including, without limitation, business stakeholders, civil society, the technical community~~,~~ and academia~~,~~), recognizing that governments and public authorities are responsible for public policy and duly ~~taking into account~~considering the public policy advice of governments and public authorities~~.~~; and

g. ~~8.~~ Striving to achieve a reasonable balance between the interests of different stakeholders~~.~~;

4. These Commitments and Core Values are intended to apply in the broadest possible range of circumstances. ~~The Commitments reflect ICANN's fundamental compact with the global Internet community and are intended to apply consistently and comprehensively to ICANN's activities. The specific way in which~~[13]

The specific way in which Commitments and Core Values apply, individually and collectively, to each new situation may depend on many factors that cannot be fully anticipated or enumerated. Situations may arise in which perfect fidelity to all Commitments and Core Values simultaneously is not possible. In any situation where one Commitment or Core Value must be reconciled with another, potentially competing Commitment or Core Value, the balancing must further an important public interest goal that is within ICANN's Mission and that is or has been identified in advice given to ICANN or policies developed, in each case through the bottom-up, multistakeholder process.[14]

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[12] Note to ICANN: The the "fiscally responsible manner" could be problematic depending on the outcome of the budget process.

[13] Note to ICANN: The text: "The Commitments reflect ICANN's fundamental compact with the global Internet community and are intended to apply consisently and comprehensively to ICANN's activities" was deleted because of vagueness. In addition, the implication that ICANN has a written agreement (i.e. compact) with the global Internet community is difficult to comprehend.

[14] Note to ICANN: There needs to be a way for Commitments and Core Values to be reconciled. We recommend keeping a variation of the current test, but have not made the needed edits because the Board appears fine with the CCWG's proposed balance methodology. We also revised the language to provide for enhanced clarity.

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ACCOUNTABILITY AND TRANSPARENCY REVIEW

~~p. 74 et seq.~~

1. Periodic Reviews[15]

ICANN will produce an annual report on ~~the state of~~its accountability and transparency, including any improvements ~~to Accountability~~thereto and ~~Transparency.~~

~~h.~~a. ~~ICANN will be responsible for creating an annual report that details~~ the status of implementation ~~on all~~of the recommendations arising from the reviews ~~defined~~described in this ~~section. This annual review implementation report~~Article IV, Section 5, which will be ~~opened~~posted on the Website for ~~a~~ public review and comment ~~period that~~. Each such annual report and the public comments thereto will be considered by the ~~ICANN~~ Board and serve as input to the continuing process of implementing the recommendations ~~from the Review Teams defined in this section.~~arising from such reviews.

~~i.~~b. Review teams ~~are~~will be established ~~to~~and include both a fixed number of members and an open number of participants. Each ~~SO~~Supporting Organization and ~~AC~~Advisory Committee participating in the ~~Review~~ applicable review may suggest up to 7 prospective members for the ~~Review Team.~~applicable review team. The ~~group of~~ chairs of the ~~participating SOs and ACs~~Supporting Organizations and Advisory Committees will select ~~a group of~~ up to 21 ~~Review Team~~ members~~,~~

[15] Alternative Proposal: Delete Sections 1 and 2 of Article IV in their entirety and replace them with the following:

1. ICANN will produce an annual report on its accountability and transparency, including any improvements thereto and the status of implementation of the recommendations arising from the reviews described in this Article IV, Section 5, which will be posted on the Website for public review and comment. Each such annual report and the public comments thereto will be considered by the Board and serve as input to the continuing process of implementing the recommendations arising from such reviews. [Note: Same as current 1(a).]

2. The reviews described in this Article IV, Section 5 will be conducted in accordance with the most recent Board-approved practices for periodic reviews, which will be developed in coordination with the Supporting Organizations and Advisory Committees.

~~balanced~~ for ~~diversity and skills, to~~the applicable review team, which may include up to a maximum of 3 members from each ~~participating SO and AC .~~Supporting Organization and Advisory Committee. The Supporting Organization and Advisory Committee chairs should work together to achieve a review team that is balanced for diversity and skill. In addition, the ICANN Board may designate one director as a member of the ~~Review Team.~~ review team.[16]

~~j.~~c. If consensus cannot be reached among the members and participants of a review team, consensus will be sought among just the members. In the event ~~a~~ consensus cannot be ~~found~~reached among the members, a majority vote of the members may be taken. ~~In this case~~If a vote is taken, both a majority recommendation and a minority response should be provided in the final report of the ~~Review Team.~~ review team.

~~k.~~d. ~~Review Teams~~Subject to budgetary constraints and the availability of funding, review teams may also ~~solicit and~~ select independent experts to render advice as requested by the ~~Review Team~~review team, and the review team may choose to accept or reject all or part of ~~this~~such advice.[17]

2. Confidential Disclosure to Review Teams

~~l.~~a. To facilitate transparency and openness regarding ICANN's deliberations and operations, ~~the Review Teams, or a subset thereof, shall have~~ a review team may request access to ICANN internal information and documents~~.~~ that are related to and reasonably necessary for the review team's applicable review. If ICANN ~~refuses~~staff declines to reveal documents or information so requested by ~~the Review Team~~a review team, ICANN staff must provide a ~~justification~~written explanation to the ~~Review Team~~review team. If a consensus of the ~~Review Team is~~review team's members are not satisfied with ICANN's ~~justification, it can~~explanation, the review team may appeal to the Ombudsman and/or the ~~ICANN~~ Board for a ~~ruling~~determination on the disclosure request~~.~~, which in the case of the Board shall be final. Any determination of the Ombudsman is not

[16] Note to ICANN: Alternatively, consider whether specifying review teams in this level of detail is appropriate.

[17] Note to ICANN: Budgetary constraints should be considered.

binding on ICANN staff, but may be submitted by the applicable review team when appealing to the Board for a determination.[18]

~~m.~~b. ~~For documents and information that ICANN does disclose to the Review Team, ICANN~~ ICANN may designate certain documents and information that are disclosed to a review team as not for further disclosure by the ~~Review Team~~review team, either in its report or otherwise~~.~~, and may, as a condition to receiving any such documents and information, require review team members to sign a non-disclosure agreement. Such documents and information will only be provided to the review team's members and will not be distributed to participants. Any review team member who is found to have subsequently disclosed such information will be removed from the review team and will not be eligible to be a member or participant of future review teams without the approval of the Board. If ~~the Review Team is~~a consensus of the review team's members are not satisfied with ICANN's designation of non-disclosable documents or information, it can appeal to the Ombudsman and/or the ~~ICANN~~ Board for a ~~ruling~~determination on the non-disclosure designation~~.~~, which in the case of the Board shall be final. Any determination of the Ombudsman is not binding on ICANN staff, but may be submitted by the applicable review team when appealing to the Board for a determination.[19]

c. Confidential Disclosure Framework

(i) A confidential disclosure framework shall be published and periodically reviewed and updated by ICANN. The confidential disclosure framework shall describe the process by which documents and information are classified, including a description of the levels of classification that documents or information may be subject to, and the classes of persons who may access such documents and information.

(ii) The confidential disclosure framework shall describe the process by which a ~~Review Team~~review team may request access to documents and information ~~that are designated as classified or restricted access.~~ pursuant to Article IV, Section 5, clause 2.a.

[18] Note to ICANN: Revised to limit confidential disclosure requests to items related to the review and reasonably necessary for the review.

[19] Note to ICANN: We have added in restrictions on the disclosure of confidential information to prevent leaks and provide consequences for such leaks.

(iii) The confidential disclosure framework shall also describe the provisions of any non-disclosure agreement that members of a ~~Review Team~~review team may be asked to sign~~.~~ pursuant to Article IV, Section 5, clause 2.b.

~~The confidential disclosure framework must provide a mechanism to escalate and/or appeal the refusal to release documents and information to duly recognized Review Teams.~~

d. ~~The draft report of the~~ Review Team ~~should~~ Reports

~~(iv)~~(i) All draft reports of each review team must describe the degree of consensus reached by the ~~Review Team.~~ review team on each recommendation contained in such reports.

~~(v)~~(ii)~~The Review Team~~ Where consensus of the review team members can be reached, review teams should ~~attempt to assign priorities to its~~ prioritize their recommendations~~.~~, and provide a rationale for such prioritization.

~~The draft report~~ Draft reports of ~~the Review~~review teams will be published for public comment. The ~~Review Team will~~review team must consider ~~such~~the public ~~comment~~comments received and shall amend ~~the Review~~its report as it deems appropriate before issuing its final report ~~and forwarding the recommendations~~ to the Board.

(iii) The final ~~output of all Reviews~~report must describe the degree of consensus reached by the review team on each recommendation contained in the report as well as a summary of changes made in response to the public comments.[20]

~~(vi)~~(iv) All final reports issued by review teams will be published for public comment. ~~The~~ Following the conclusion of such public comment period, the Board shall consider the final report and all public comments received in response thereto in deciding how to implement the recommendations of the review team. Following any such approval ~~and~~, the Board shall instruct ICANN staff to begin implementation ~~within six months of receipt~~

[20] Note to ICANN: Revised to provide greater consideration of pubic comment and to require degree of consensus in the final report.

~~of~~ of the recommendations~~.~~ approved by the Board within 180 days of such approval.[21]

10.3. ~~1.~~ Accountability ~~&~~and Transparency Review~~.~~

a. The Board shall cause a periodic review of ICANN's execution of its commitment to maintain and improve robust mechanisms for public input, accountability, and transparency so as to ensure that the outcomes of its decision-making will reflect the public interest and be accountable to ~~all stakeholders.~~the Internet community ("Accountability and Transparency Review").[22]

~~Issues that may merit attention in this Review include:~~

b. ~~(a)~~ The Accountability and Transparency Review may address any number issues, including the following:[23]

(i) assessing and improving ~~ICANN~~ Board governance, which shall include an ongoing evaluation of ~~Board~~the Board's performance, the Board selection process, the extent to which ~~Board~~the Board's composition meets ICANN's present and future needs, and the consideration of an appeal mechanism for Board decisions;

(ii)~~(b)~~ assessing the role and effectiveness of ~~GAC~~Governmental Advisory Committee's interaction with the Board and making recommendations for improvement to ensure effective consideration by ICANN of ~~GAC~~the Governmental Advisory Committee's input on the public policy aspects of the technical coordination of the DNS;

(iii) ~~(c)~~ assessing and improving the processes by which ICANN receives public input (including adequate explanation of decisions taken and the rationale thereof);

(iv) ~~(d)~~ assessing the extent to which ICANN's decisions are embraced, supported and accepted by the public and the Internet community; and

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[21] Note to ICANN: Remove the timing restriction on implementation as that may not be realistic for all recommendations. Also revised to allow Board to consider public comments receive to final report as otherwise the final public comment period is useless.

[22] Note to ICANN: Revised to provide that accountability is to the community.

[23] Note to ICANN: Revised to provide that this is the entire list of issues to review so as to keep some scope as to what is to be reviewed.

(v) ~~(e)~~ assessing the policy development process to facilitate enhanced cross community deliberations, and effective and timely policy development.

~~b.~~c. The Accountability and Transparency Review ~~Team~~team shall also assess the extent to which prior Accountability and Transparency Review recommendations have been implemented~~.~~ by ICANN, and the extent to which implementation of the recommendations has had the intended effect.

~~c.~~d. The Accountability and Transparency Review ~~Team~~team may recommend termination or amendment of other periodic ~~Reviews~~reviews required by this ~~section~~Article IV, Section 5, and may recommend the creation of additional periodic ~~Reviews~~reviews.

~~d.~~e. ~~This~~The Accountability and Transparency Review ~~Team~~team should ~~complete~~issue its ~~review~~final report within one year of convening its first meeting.

~~e.~~f. ~~This periodic~~The Accountability and Transparency Review shall be ~~convened~~conducted no less frequently than every five years, measured from the date the previous review ~~was~~team convened~~.~~ its first meeting.

~~11.~~4. ~~2. Preserving~~ Security, Stability, and Resiliency~~.~~ Review

a. The Board shall cause a periodic ~~Review~~review of ICANN's execution of its commitment to enhance the operational stability, reliability, resiliency, security, and global interoperability of the DNS~~.~~ ("SSR Review").

~~In this Review, particular attention will be paid to:~~

b. ~~(a)~~ The SSR Review may address any number of issues, including the following:

(i) security, stability and resiliency matters, both physical and network, relating to the secure and stable coordination of the Internet DNS;

(ii) ~~(b)~~ ensuring appropriate contingency planning; and

(iii) ~~(c)~~ [maintaining clear processes~~.~~].[24]

~~b.~~c. Each ~~of the Reviews conducted under this section will~~SSR Review will also assess the extent to which ICANN has successfully implemented ~~the~~its current security plan, the effectiveness of the current plan to deal with actual and potential challenges and threats to security and stability, and the extent to which the current security plan is sufficiently robust to meet future challenges and threats to the security, stability and resiliency of the Internet DNS, consistent with ICANN's limited technical Mission.[25]

~~c.~~d. The SSR Review team shall assess the extent to which prior SSR Review recommendations have been implemented~~.~~ by ICANN.

e. ~~This periodic~~The SSR Review team should issue its final report within one year of convening its first meeting.

~~d.~~f. The SSR Review shall be ~~convened~~conducted no less frequently than every five years, measured from the date the previous ~~Review was~~review team convened~~.~~ its first meeting.

~~**3. Promoting Competition, Consumer Trust, and Consumer Choice.**~~

5. ~~ICANN will ensure that as it expands the Top-Level Domain (TLD) space, it will~~gTLD Review

~~e.~~a. The Board shall cause a review of ICANN's execution of its commitment to adequately address issues of competition, consumer protection, security, stability and resiliency, malicious abuse issues, sovereignty concerns, and rights protection~~.~~ as it expands the TLD space, within one year after any batched round of new gTLDs have been in operation ("gTLD Review").

~~The Board shall cause a Review of ICANN's execution of this commitment after any batched round of new gTLDs have been in operation for one year.~~

[24] Note to ICANN: This clause is unclear.

[25] Note to ICANN: Clarification that the review will be of the "current" plan so as to be flexible for future security plans.

f.b. This The gTLD Review will examine the extent to which the applicable expansion of gTLDs has promoted competition, consumer trust, and consumer choice, as well as the effectiveness of:

(i) (a) the gTLD application and evaluation process; and

(ii) (b) the safeguards put in place to mitigate issues involved in the expansion. of generic top level domains.

g.c. The gTLD Review team shall also assess the extent to which prior gTLD Review recommendations have been implemented. by ICANN, and the extent to which implementation of the recommendations has had the intended effect.

d. SubsequentThe gTLD Review team should issue its final report within one year of convening its first meeting.

h.e. The Board will consider the gTLD Review team's recommendations in determining if, when and how subsequent rounds of new gTLDs (if any) should not be opened until the recommendations of the previous Review required by this section have been implemented.[26]

i.f. These periodic Reviews The gTLD Review shall be convenedconducted no less frequently than every five years, measured from the date the previous Review wasreview team convened. its first meeting.

4. Reviewing effectiveness of WHOIS/Directory Services policy and the extent to which its implementation meets the legitimate needs of law enforcement and promotes consumer trust.

6. WHOIS/Directory Services Review[27]

j.a. ICANN commitsis committed to enforcing its existing policy relating to the current WHOIS/ and any future gTLD Directory ServicesService, subject to applicable laws. Such existing policy requires that ICANN implement measures, and working with the Supporting Organizations,

[26] Note to ICANN: Provided for consideration of gTLD Reviews, but as identified by the Board, an absolute block is inappropriate.

[27] Note to ICANN: Description is beyond what is called for in AoC and has inappropriate editorializing for a heading. Conformed to be consistent with above periodic reviews.

Advisory Committees, and other relevant stakeholders to ~~maintain timely, unrestricted and public~~explore structural changes to improve the accuracy of and access to ~~accurate and complete WHOIS information, including registrant, technical, billing, and administrative contact information.~~ gTLD registration data, as well as consider safeguards for protecting data.[28]

~~k.~~b. The Board shall cause a periodic ~~Review~~review to assess the extent to which WHOIS/Directory Services policy is effective and its implementation meets the legitimate needs of law enforcement ~~and~~, promotes consumer trust~~.~~ and safeguards data ("WHOIS/Directory Services Review").

~~This~~The WHOIS/Directory Services Review ~~will consider the OECD guidelines regarding privacy, as defined by the OECD in 1980 and amended in 2013.~~

~~l.~~c. ~~The Review Team~~team shall also assess the extent to which prior WHOIS/Directory Services Review recommendations have been implemented~~.~~ by ICANN, and the extent to which implementation of the recommendations has had the intended effect.

d. ~~This periodic~~The WHOIS/Directory Services Review team should issue its final report within one year of convening its first meeting.[29]

~~m.~~e. The WHOIS/Directory Services Review shall be ~~convened~~conducted no less frequently than every five years, measured from the date the previous ~~Review was~~review team convened~~.~~ its first meeting.

[28] Note to ICANN: This is based on Bruce Tonkin's 2 September 2015 email at 1:24 GMT.
[29] Note to ICANN: There was no time frame for gTLD Reviews in the CCWG proposal.