

This comment is submitted on behalf of the Just Net Coalition (JNC) which comprises several dozen civil society organizations and individuals from different regions globally, concerned with issues of Internet governance, from the perspective of all human rights, including democracy and economic and social justice. The JNC web site is at: <http://justnetcoalition.org>

We refer to the CCWG-Accountability proposal published at:

<https://www.icann.org/en/system/files/files/ccwg-draft-2-proposal-work-stream-1-recs-03aug15-en.pdf>

That CCWG-Accountability proposal does NOT enhance ICANN's accountability. On the contrary, it hands effective control of ICANN to the domain name and address industry, a narrow segment of the global multistakeholder community.

As we have previously stated, ICANN must become a true membership organization, not a fake one in which there is only one member and that member is controlled by the very industry that ICANN is supposed to regulate. Further, ICANN must not remain subject to US jurisdiction.

We refer to our proposal, at:

<http://forum.icann.org/lists/icg-forum/pdfXXrCnTxCwW.pdf>

In addition, we associate with the comments at:

<http://forum.icann.org/lists/comments-ccwg-accountability-draft-proposal-04may15/msg00000.html>

Those comments apply a fortiori to the latest CCWG-Accountability proposal.

Richard Hill on behalf of the Just Net Coalition