

Consultation on enhancing accountability - response from UK Children's Charities' Coalition on Internet Safety

Dear ICANN

You requested comments in relation to:

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

In particular I refer to paragraph 187:

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.

The meaning or intent of the paragraph as a whole is not very clear but the latter part of the second sentence potentially is deeply alarming and needs to be changed. Perhaps only the first sentence should be left in but then, as it stands, it would then only be stating what is, in any event, legally obvious.

The wording presented is too restrictive. Why would ICANN want intentionally to deprive itself of a power to act in any ways which are consistent with its overarching mission? CHIS speaks from the standpoint of a concern for domains which are misused to distribute child abuse images or to promote other forms of child sexual exploitation. If unique identifiers have some utility in assisting with the speedier closure of such domains that ought to be welcomed by anyone and everyone who has a power or the potential to act in that manner.
Regards

John Carr
Secretary
UK Children's Charities' Coalition on Internet Safety