

The Information Technology Industry Council, ITI, is pleased to once again have the opportunity to comment on the work of the Cross Community Working Group on Enhancing ICANN Accountability (CCWG). We wish to thank the numerous volunteers who have logged many hours and miles in developing the “2nd Draft Report on Work Stream 1 Recommendations.” We urge the CCWG and other stakeholders to insist that this proposal serve as the locus of all further deliberations on enhancing ICANN accountability.

ITI represents the world’s leading providers of information and communications technology (ICT) products and services. As the voice of the high tech community, we advocate policies that help advance technology and innovations and improve people’s lives. Maintaining the existing multistakeholder system of Internet governance is a critical and essential component of that objective.

As we have stated in previous comments, ITI supports the IANA stewardship transition process initiated by U.S. Department of Commerce’s National Telecommunications and Information Administration (NTIA) last year. We view it as a logical and necessary step in strengthening multistakeholder governance of the Internet. At the same time, we recognize that some stakeholders have concerns regarding the transition in general, and with ICANN processes in particular. Thus, we also strongly support the initiative to revise and enhance ICANN’s bylaws and procedures so as to increase organizational accountability to the broader community. Indeed, we view this initiative as an essential and necessary component of the IANA stewardship transition.

The 2nd Draft Report on Work Stream 1 Recommendations contains significant improvements over the initial draft, and meets relevant benchmarks established by the NTIA. In particular, we strongly support the proposed change to Article XI section 2 clause J of the ICANN Bylaws (paragraph 619) regarding “Stress Test #18.” We believe the proposed revision provides essential clarity regarding the appropriate role and weight that should be afforded to GAC advice. ITI believes that it is appropriate for the ICANN Board of Directors to assign additional weight and consideration to consensus policy advice from GAC because such advice truly

represents the considered views of all government stakeholders. In contrast, if the GAC were to cease to become advisory – because, for example, it reflected only the majority views of that community – we do not believe that such deference would be appropriate.

While some may question the necessity of certain proposed accountability provisions, we do not. Taken altogether, we believe the CCWG’s newly-proposed community powers will provide essential checks and balances while achieving an appropriate balance among the interests of all stakeholders, including those of the Board of Directors and staff. If fully adopted and implemented prior to the IANA stewardship transition, we believe the proposal will help engender and strengthen community trust and confidence in ICANN as the sole steward of the IANA functions.

Again, we applaud the CCWG for this solid proposal.

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