

5.2 Reconsideration Process Enhancement

Introduction

The CCWG-Accountability proposes a number of key reforms to ICANN's Request for Reconsideration process, whereby the ICANN Board of Directors is obliged to reconsider a recent decision or action / inaction by ICANN's Board or staff, and which is provided for in Article IV, Section 2 of ICANN's Bylaws. The key reforms proposed include: the scope of permissible requests has been expanded to include Board/staff actions or inactions that contradict ICANN's Mission or Core Values and for reconciling conflicting/inconsistent "expert opinions," and the time for filing a Request for Reconsideration has been extended from 15 to 30 days. Additionally, the grounds for summary dismissal have been narrowed and the ICANN Board of directors must make determinations on all requests (rather than a committee handling staff issues). Another proposed change is that ICANN's Ombudsman should make the initial substantive evaluation of the requests to aid the Board Governance Committee in its recommendation, and then requesters are provided an opportunity to rebut the Board Governance Committee's recommendation before a final decision by the entire Board. More transparency requirements and firm deadlines in issuing of determinations are also proposed.

Standing

Amend "who" has proper standing to file a Reconsideration Request to widen its scope by including Board/staff actions/inactions that contradict ICANN's Mission or core values (was only policies before). It is noted that under the existing Bylaws paragraph 2 significantly reduces the rights purportedly granted in paragraph 1 of the Reconsideration Request process.

ICANN's Bylaws could be revised (added text in red below):

- a. ICANN shall have in place a process by which any person or entity materially affected by an action of ICANN shall have in place a process by which any person or entity mater/staff.
- b. Any person or entity may submit a request for reconsideration or review of an ICANN action or inaction ("Reconsideration Request") to the extent that he, she, or it or the public interest have been adversely affected by:
- c. One or more ICANN Board or staff actions or inactions that contradict established ICANN policy(ies), its Mission, Commitments and/or Core Values; or
- d. One or more actions or inactions of the ICANN Board/staff that have been taken or refused to be taken without consideration of material information, except where the party submitting the request could have submitted, but did not submit, the information for the Board's consideration at the time of action or refusal to act; or

- e. One or more actions or inactions of the ICANN Board/staff that are taken as a result of the Board's reliance on false or inaccurate ~~material~~ **relevant** information.

~~In their letter dated 15 April 2015, the CWG-Stewardship request indicated “As such, any appeal mechanism developed by the CCWG-Accountability should not cover ccTLD delegation / re-delegation issues as these are expected to be developed by the ccTLD community through the appropriate processes.” As requested by the CWG-Stewardship, decisions regarding ccTLD delegations or revocations would be excluded from standing, until relevant appeal mechanisms have been developed by the ccTLD community, in coordination with other interested parties.~~

[this request cannot be accepted, because the ccTLD Community currently is lacking of the component of the Community applications. All community applicants (those selected after the CPE process) are today de facto excluded by the ccTLD Community exactly because of the abuse or misuse of the IRP mechanism. Unless this problem will be removed, there is a high risk that public interest will not be sufficiently considered by the current representation of ccTLD within ICANN]

Disputes related to Internet number resources are out of scope of the IRP.

Goals

The CCWG-Accountability proposals aim to:

- Broaden the types of decisions, which can be re-examined to include Board/staff action/inaction against ICANN’s Mission or Core Values (as stated in Bylaws / Articles) and for the purpose of reconciling conflicting/inconsistent expert panel opinions.
- Provide more transparency in dismissal process.
- Provide the Board with reasonable right to dismiss frivolous requests, but not solely on the grounds that the complainant failed to participate in a relevant policy development or public comment period or that the request is vexatious or querulous.
- Propose to amend Paragraph 9 on BGC summary dismissal as follows:
 - The Board Governance Committee shall review each Reconsideration Request upon its receipt to determine if it is sufficiently stated. The Board Governance Committee may summarily dismiss a Reconsideration Request if: (i) the requestor fails to meet the requirements for bringing a Reconsideration Request; (ii) it is frivolous ~~querulous or vexatious~~; or (iii) ~~the requestor had notice and opportunity to, but did not, participate in the public comment period relating to the contested action, if applicable.~~ The Board Governance Committee’s summary dismissal of a Reconsideration Request shall be **documented and promptly** posted on the Website.

Composition

The group considers there is need to rely less on the ICANN legal department (who holds a strong legal obligation to protect the corporation) to guide the BGC on its

recommendations. More Board member engagement is needed in the overall decision-making process.

Requests should no longer go to ICANN's lawyers (in-house or out-house) for the first substantive evaluation. Instead, the Requests shall go to ICANN's Ombudsman who would make the initial recommendation to the BGC. The Ombudsman may have more of an eye for fairness to the community in looking at these requests. Note the Bylaws charge the BGC with these duties, so BGC would utilize the Ombudsman instead of its current practice of ICANN's lawyers to aid the BGC's in its initial evaluation. The Ombudsman, in particular, will have to issue his concern to the Board in case of suspect misuse of the RR process of or frivolous request.

All final determinations of reconsideration requests are to be made by the entire Board (not only requests about Board actions as is the current practice).

Amend Paragraph 3:

- f. The Board has designated the Board Governance Committee to review and consider any such Reconsideration Requests. The Board Governance Committee shall have the authority to:
 - o Evaluate requests for review or reconsideration;
 - o Summarily dismiss insufficient requests;
 - o Evaluate requests for urgent consideration;
 - o Conduct whatever factual investigation is deemed appropriate;
 - o Request additional written submissions from the affected party, or from other parties;
 - o ~~Make a final determination on Reconsideration Requests regarding staff action or inaction, without reference to the Board of Directors;~~ and
 - o Make a recommendation to the Board of Directors on the merits of the request, as necessary.

And delete Paragraph 15 since the Board will make all final decisions regarding requests related to staff action/inaction.

Decision-Making

Transparency improvements are needed regarding the information that goes into the Board's decision-making process and the rationale for why decisions are ultimately taken. Recordings / transcripts should be posted of the substantive Board discussions on the option of the requester.

Provide a rebuttal opportunity to the BGC's final recommendation (although requesters can't raise new issues in a rebuttal) before the full Board finally decides.

Adding hard deadlines to the process, including an affirmative goal that final determinations of the Board be issued within sixty days from request filing wherever possible, and in no case more than 120 days from the date of the request.

Propose to amend reconsideration rules as follows:

The Board Governance Committee shall make a final ~~determination or a~~ recommendation to the Board with respect to a Reconsideration Request within thirty days following its receipt of the request, unless impractical, in which case it shall report to the Board the circumstances that prevented it from making a final recommendation and its best estimate of the time required to produce such a final ~~determination or~~ recommendation. In any event, the BGC's final recommendation to the Board shall be made within 90 days of receipt of the Request. The final recommendation shall be promptly posted on ICANN's website and shall address each of the arguments raised in the Request. The Requestor may file a rebuttal to the recommendation of the BGC within 15 days of receipt of it, which shall also be promptly posted to ICANN's website and provided to the entire Board for its evaluation.

The Board shall not be bound to follow the recommendations of the Board Governance Committee. The final decision of the Board and its rationale shall be made public as part of the preliminary report and minutes of the Board meeting at which action is taken. The Board shall issue its decision on the recommendation of the Board Governance Committee within 60 days of receipt of the Reconsideration Request or as soon thereafter as feasible. Any circumstances that delay the Board from acting within this timeframe must be identified and posted on ICANN's website. In any event, the Board's final decision shall be made within 120 days of receipt of the Request. The final recommendation shall be promptly posted on ICANN's website. In any event, the Board's final decision shall be made within 120 days of decision on the recommendation is final.

Following the result of the Reconsideration Request, CEP/IRP process should only be possible if the Initial decision that is contested and RR decisions come to opposite results, but not if they have both the same outcome; in the latter case only procedural matters could be looked at by IRP, and with effect only for future procedures

Accessibility

Extend the time deadline for filing a Reconsideration Request from 15 to 30 days from when Requester learns of the decision/inaction.

Amend paragraph 5 as follows:

1. All Reconsideration Requests must be submitted to an e-mail address designated by the Board Governance Committee within 30 days after:
 - a) For requests challenging Board actions, the date on which information about the challenged Board action is first published in a resolution, unless the posting of the resolution is not accompanied by a rationale. In that instance, the request must be submitted within 30 days from the initial posting of the rationale; or
 - b) For requests challenging staff actions, the date on which the party submitting the request became aware of, or reasonably should have become aware of, the challenged staff action; or
 - c) For requests challenging either Board or staff inaction, the date on which the affected person reasonably concluded, or reasonably should have concluded, that action would not be taken in a timely manner.

Due Process

ICANN's Document and Information Disclosure Policy (DIDP) is an important issue to be addressed in Work Stream 2 and should be improved to accommodate the legitimate need for requesters to obtain internal ICANN documents that are relevant to their requests.

All briefing materials supplied to the Board should be provided to the Requester so that they may know the arguments against them and have an opportunity to respond (subject to legitimate and documented confidentiality and privilege requirements).

Final decisions should be issued sooner – changes will include an affirmative goal that final determinations of the Board should be issued within sixty days from request filing wherever possible, and in no case more than 120 days from the date of the request.

Requesters should be provided more time to learn of action/inaction and to file the request.

Transparency improvements throughout the process are called for, including more complete documentation and prompt publication of submissions and decisions including their rationale.

5. Appeals Mechanisms - my proposals of modification within the text in red

- *Subject:* 5. Appeals Mechanisms - my proposals of modification within the text in red
 - *From:* Mazzone, Giacomo
-

5. Appeals Mechanisms

5.1 Independent Review Process Enhancement

Introduction

The consultation process undertaken by ICANN produced numerous comments calling

for overhaul and reform of ICANN's existing Independent Review Process (IRP).

Commenters called for ICANN to be held to a substantive standard of behavior

rather

than just an evaluation of whether or not its action was taken in good faith.

Commenters

called for a process that was binding rather than merely advisory.

Commenters

also

strongly urged that the IRP be accessible, both financially and from a standing

perspective, transparent, efficient, and that it be designed to produce consistent and

coherent results that will serve as a guide for future actions.

Comments from Public Consultation

Commenters expressed support for the general idea of strengthening ICANN's

Independent Review process; none expressed a contrary view. The Board declined

to

comment on the grounds that it could not respond to the IRP proposal without

more

detail. Regarding the overall structure of the IRP, two commenters urged that

it "has to

remain an internal mechanism within ICANN," i.e. that it not be designed as a

"traditional

court of international arbitration" or "international commercial arbitration

panel." The

CCWG-Accountability revised the text from the Initial Draft Report (4 May 2015)

based

on community input and further discussions.

The process described below calls for a standing, independent panel of skilled

jurists/arbitrators who are retained by ICANN and can be called upon over time

and

across issues to resolve disputes regarding whether ICANN is staying within its

limited

technical Mission and acting in accordance with ICANN's Articles of Incorporation and/or

Bylaws.

The proposal calls for a fully independent judicial/arbitral function. The

purpose of a

standing panel is to ensure that panelists are not beholden to ICANN or any of

its

constituent bodies - but a core skill of this IRP's panelists is the need to

build a thorough

and detailed understanding of how ICANN's Mission is implemented, and its

commitments and values applied - over time and across a variety of situations.

The proposal does not establish a new international court or a new body of

international

law: it is not a Treaty function, and is internal to ICANN. It reviews application of rules for

ICANN established by the ICANN multistakeholder community. Those rules remain

under the control of the ICANN multistakeholder community, so this IRP remains a

mechanism the community is using to ensure that its policies and processes are

followed, and does not become a means to replace or subordinate the multistakeholder

community to some other entity.

Implementation of these enhancements will necessarily require additional,

detailed work.

Detailed rules for the implementation of the IRP (such as rules of procedure)

are to be

created by the ICANN community through a Cross Community Working Group (assisted

by counsel, appropriate experts, and the Standing Panel when confirmed), and

approved

by the Board, such approval not to be unreasonably withheld. They may be

updated in

the light of further experience by the same process, if required. In addition,

to ensure that

the IRP functions as intended, we propose to subject the IRP to periodic

community

review.

1. Purpose of the IRP: The overall purpose is to ensure that ICANN does not

exceed the scope of its limited technical Mission and complies with its Articles

of Incorporation and Bylaws.

a) Empower the community and affected individuals/entities to prevent "mission creep" enforce compliance with the Articles and Bylaws through meaningful, affordable, accessible expert review of ICANN actions.

b) Ensure that ICANN is accountable to the community and individuals/entities for actions outside its Mission or that violate its

Articles or Bylaws.

c) Reduce disputes going forward by creating precedent to guide and inform ICANN Board, staff, SOs and ACs, and the community in connection with policy development and implementation.

d) Protect the public interest and the interest of the weaker parts of the

community, against any abuse or misconduct by the Board.

2. Role of the IRP: The role of the Independent Review Process (IRP) will be

to:

a) Hear and resolve claims that ICANN through its Board of Directors or staff has acted (or has failed to act in violation of its Articles of Incorporation or Bylaws (including any violation of the Bylaws resulting from action taken in response to advice/input from any Advisory Committee or Supporting Organization);

b) Reconcile conflicting decisions of process-specific "expert panels"; and

c) Hear and resolve claims involving rights of the Sole Member under the

Articles or Bylaws (subject to voting thresholds).

3. A Standing Panel: The IRP should have a standing judicial/arbitral panel

tasked with reviewing and acting on complaints brought by individuals, entities, and/or the community who have been materially harmed by ICANN's

action or inaction in violation of the Articles of Incorporation and/or Bylaws.

4. Initiation of an IRP: An aggrieved party would trigger the IRP by filing a

complaint with the panel alleging that a specified action or inaction is in

violation of ICANN's Articles of Incorporation and/or Bylaws. Matters specifically reserved to the Sole Member of ICANN in the Articles or Bylaws

would also be subject to IRP review.

In case third parties are involved or could be affected by the results of the

IRP,

they need to be informed from the very early stage and involved in the process,

at no extra cost.

If the contested issue could have as final outcome only a responsibility of the

Board, any decisions affecting third parties could not be put on-hold until the

IRP

Process will be over.

5. Possible Outcomes of the IRP: An IRP will result in a declaration that an

action/failure to act complied or did not comply with ICANN's Articles of

Incorporation and/or Bylaws. To the extent permitted by law, IRP decisions

should be binding on ICANN.

a) Decisions of a three-member decisional panel will be appealable to the full IRP Panel sitting en banc, based on a clear error of judgment or the application of an incorrect legal standard. The standard may be revised or supplemented via the IRP Sub Group process.

b) This balance between the limited right of appeal and the limitation to

the type of decision made is intended to mitigate the potential effect that one key decision of the panel might have on several third parties, and to avoid an outcome that would force the Board to violate its fiduciary duties.

c) The limited right to appeal is further balanced by the community powers, relevant policy development process, and advice from ACs, each as set forth in the Bylaws.

d) IRP panelists will consider and may rely on prior decisions of other IRPs addressing similar issues.

e) Interim (prospective, interlocutory, injunctive, status quo preservation)

relief will be available in advance of Board/management/staff action where a complainant can demonstrate:

i. Harm that cannot be cured once a decision has been taken or for which there is no adequate remedy once a decision has been taken;

ii. Either (a) a likelihood of success on the merits or (b) sufficiently serious questions going to the merits; and

iii. A balance of hardships tipping decidedly toward the party seeking the relief.

6. Standing: Any person/group/entity "materially affected" by an ICANN action

or inaction in violation of ICANN's Articles of Incorporation and/or Bylaws

shall have the right to file a complaint under the IRP and seek redress. They

must do so within [number of days to be determined by IRP Sub Group] days

of becoming aware of the alleged violation and how it allegedly affects them.

The Sole Member has standing to bring claims involving its rights under the

Articles and Bylaws. Issues relating to joinder and intervention will be

determined by the IRP Sub Group, assisted by experts and the initial Standing Panel, based on consultation with the community.

To prevent the abuse or misuse of this tool, each subject (or group of subjects

controlled by the same economic interests) cannot apply for more than one IRP

at the time. Only once first IRP judgement has been delivered, could eventually

apply for a new one.

7. Community IRP: The CCWG-Accountability recommends giving the community the right to have standing with the IRP. In such cases, ICANN will

bear the costs associated with the Standing Panel, although the IRP Sub Group may recommend filing or other fees to the extent necessary to prevent

abuse of the process. Third parties eventually concerned or affected by the IRP

potential decision, have to be informed of the process since the very first step

and have the right to ask to be associated to the process in a formal and

regular

way at no costs.

8. Exclusions; ccTLD Delegation/Redelegation: In their letter dated 15 April

2015, the CWG-Stewardship indicated that, "any appeal mechanism developed by the CCWG-Accountability should not cover ccTLD

delegation/re-delegation issues as these are expected to be developed by the

ccTLD community through the appropriate processes". As requested by the CWG-Stewardship, decisions regarding ccTLD delegations or revocations would be excluded from standing, until the ccTLD community, in coordination

with other parties, has developed relevant appeals mechanisms.

[this request cannot be accepted, because the ccTLD Community currently is

lacking of the component of the Community applications. All community applicants

(those selected after the CPE process) are today de facto excluded by the ccTLD

Community exactly because of the abuse or misuse of the IRP mechanism. Unless

this problem will be removed, there is a high risk that public interest will

not be sufficiently considered by the current representation of ccTLD within

ICANN]

9. Exclusions; Numbering Resources: The Address Supporting Organization has likewise indicated that disputes related to Internet number resources

should be out of scope for the IRP. As requested by the ASO, decisions regarding numbering resources would be excluded from standing.

10. Standard of Review: The IRP Panel, with respect to a particular IRP, shall

decide the issue(s) presented based on their own independent interpretation

of the ICANN Articles and Bylaws in the context of applicable governing law.

The standard of review shall be an objective examination as to whether the

complained-of action exceeds the scope of ICANN's Mission and/or violates

ICANN's Articles and Bylaws. Decisions will be based on each IRP panelist's

assessment of the merits of the claimant's case. The panel may undertake a

de novo review of the case, make findings of fact, and issue decisions based

on those facts.

11. Composition of Panel and Expertise: Significant legal expertise, particularly international law, corporate governance, and judicial systems/dispute resolution/arbitration. Panelists should also possess

expertise, developed over time, about the DNS and ICANN's policies, practices, and procedures. At a minimum, panelists should receive training

on the workings and management of the domain name system. Panelists must have access to skilled technical experts upon request. In addition to

legal expertise and a strong understanding of the DNS, panelists may confront issues where highly technical, civil society, business, diplomatic, and

regulatory skills are needed. To the extent that individual panelists have one

or more of these areas of expertise, the process must ensure that this expertise is available upon request.

12. Diversity: English as primary working language with provision of translation

services for claimants as needed. Reasonable efforts will be taken to achieve

cultural, linguistic, gender, and legal tradition diversity, with an aspirational

cap on number of panelists from any single region (based on the number of

members of the Standing Panel as a whole).

ICANN will establish appropriate measures to allow public interests groups

(such as community and geo TLDs and others) or community members based

in LDC to apply for or to counter IRP that they believe could be relevant for

the

interests they represent.

13. Size of Panel:

a) Standing Panel - a minimum of 7 panelists

b) Decisional Panel - 3 panelists

14. Independence: Members must be independent of ICANN, including ICANN

SOs and ACs. Members should be compensated at a rate that cannot

decline during their fixed term; no removal except for specified cause

(corruption, misuse of position for personal use, etc.) To ensure

independence, term limits should apply (5 years, no renewal), and post-term

appointment to Board, NomCom, or other positions within ICANN would be

prohibited for a specified equivalent time period. Panelists will have an

ongoing

obligation to disclose any material relationship with ICANN, SOs and ACs, or

any other party in an IRP.

a) Selection and Appointment: The selection of panelists would follow a 4-

step process: ICANN, in consultation with the community, will initiate a

tender process for an organization to provide administrative support for

IRP, beginning by consulting the community on a draft tender document.

b) ICANN will then issue a call for expressions of interest from potential

panelists; work with the community and Board to identify and solicit applications from well-qualified candidates representing all components of the

Internet community with the goal of securing

diversity; conduct an initial review and vetting of applications; and work

with ICANN and community to develop operational rules for IRP.

c) The community would nominate a slate of proposed panel members.

d) Final selection is subject to ICANN Board confirmation.

15. Recall or Other Accountability: Appointments made for a fixed term of five

(5) years with no removal except for specified cause (corruption, misuse of

position for personal use, etc.). The recall process will be developed via the

IRP Sub Group.

16. Settlement Efforts:

a) Reasonable efforts, as specified in a published policy, must be made to

resolve disputes informally prior to/in connection with filing an IRP case.

b) Parties to cooperatively engage informally, but either party may inject

independent dispute resolution facilitator (mediator) after initial CEP meeting. Either party can terminate informal dispute resolution efforts

(Cooperative Engagement Process or mediation) if, after specified

period, that party's concludes in good faith that further efforts are unlikely to produce agreement.

CEP process has to be fully transparent and eventual third parties affected

by the final judgement of the IRP or by the transitory measures taken in view

of the IRP, need to be immediately informed and consulted. In case the terms currently forecasted for the maximum expected duration of the CEP would

not be respected, ICANN needs to motivate the decision of the extension of

the CEP duration and the general interest reasons that could explain such delay.

In case of misuse of the CEP duration and of obstructive techniques applied

by the recurrent part, ICANN needs to give official and public warning.

c) The process must be governed by clearly understood and pre-published rules applicable to both parties and be subject to strict time limits.

In

particular, the CCWG-Accountability will review the Cooperative Engagement Process as part of Work Stream 2.

17. Decision Making:

a) In each case, a 3-member panel will be drawn from the Standing Panel.

Each party will select one panelist, and those panelists will select the

third. We anticipate that the Standing Panel would draft, issue for comment, and revise procedural rules. Focus on streamlined, simplified processes with rules that are easy to understand and follow.

b) Panel decisions will be based on each IRP panelist's assessment of the

merits of the claimant's case. The panel may undertake a de novo review of the case, make findings of fact, and issue decisions based on those facts. All decisions will be documented and made public and will reflect a well-reasoned application of the standard to be applied.

18. Decisions:

During the whole process, third parties eventually concerned need to be informed

and consulted, in order to express their view.

a) Panel decisions would be determined by a simple majority.

Alternatively, this could be included in the category of procedures that

the IRP Panel itself should be empowered to set.

b) The CCWG-Accountability recommends that IRP decisions be "precedential" - meaning, that panelists should consider and may rely on prior decisions. By conferring precedential weight on panel decisions, the IRP can provide guidance for future actions and inaction by ICANN decision-makers, which is valuable. It also reduces the chances of inconsistent treatment of one claimant or another, based on the specific individuals making up the decisional panel in particular cases. In this sense also the track records of claimants need to be taken in consideration by the panel, to identify those that are abusing of such process just to delay the access of other subjects into the ICANN community or for any private interest.

c) The CCWG-Accountability intends that if the Panel determines that an action or inaction by the Board or staff is in violation of the Articles or Bylaws, that decision is binding and the Board and staff shall be directed to take appropriate action to remedy the breach. However, the Panel shall not replace the Board's fiduciary judgment with its own judgment.

d) It is intended that judgments of a decisional panel or the Standing Panel would be enforceable in the court of the U.S. and other countries that accept international arbitration results.

19. Accessibility and Cost:

a) The CCWG-Accountability recommends that ICANN would bear all the administrative the costs of maintaining the system (including Panelist salaries), while each party should bear the costs of their own legal advice. The Panel may provide for loser pays/fee shifting in the event it identifies a challenge or defense as frivolous or abusive. ICANN should seek to establish access, for example by access to pro bono representation for community, non-profit complainants and other complainants that would otherwise be excluded form utilizing the process.

b) The Panel should complete work expeditiously; issuing a scheduling order early in the process, and in the ordinary course should issue decisions within a standard time frame (six months). The Panel will issue an update and estimated completion schedule in the event it is

unable to complete its work within that period.

20. Implementation: The CCWG-Accountability proposes that the revised IRP

provisions be adopted as Fundamental Bylaws. Implementation of these enhancements will necessarily require additional, detailed work.

Detailed

rules for the implementation of the IRP (such as rules of procedure) are to be

created by the ICANN community through a CCWG-Accountability (assisted by counsel, appropriate experts, winning parties involved in some IRP cases of

the last years, and the Standing Panel when confirmed),

and approved by the Board, such approval not to be unreasonably withheld.

They may be updated in the light of further experience by the same process,

if required. In addition, to ensure that the IRP functions as intended, we

propose to subject the IRP to periodic community review.

21. Transparency: The community has expressed concerns regarding the ICANN document/information access policy and implementation. Free access to relevant information is an essential element of a robust independent review process, in all phases of the process, CPE included.

We recommend reviewing and enhancing the Documentary Information Disclosure

Policy (DIDP) as part of the accountability enhancements in Work Stream 2.

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