

**China Academy of Information and Communication  
Technology (CAICT)**

**on Enhancing ICANN's Accountability**

**(September, 2015)**

China Academy of Information and Communication Technology (CAICT) welcomes the updated version of CCWG-Accountability's Proposal released in August. CAICT would like to take the opportunity to thank CCWG members and all parties for their devoted efforts and contribution to prepare this proposal, and would like to offer the following comments:

I. Considering the importance of the work on enhancing ICANN's accountability, we would like to suggest an extension to the public comment period so as to fully listen to the voices of the global Internet community, and facilitate the comments submitting process via various means for all stakeholders.

II. According to our understanding, in the new accountability framework, ICANN Board will continue to seek advice from GAC and seriously consider them in terms of public policies. In addition, the new accountability framework puts forward a Sole Membership Model with a set of voting system for the community so that the community has the power to influence the decisions from the ICANN Board. However, GAC hasn't

made a decision on whether to support this model or not. Since the DNS Root Zone Management involves the Internet public policies of all countries, we suggest that the accountability proposal shall further clarify the dispute resolution process with regard to public policies. For instance, other than the voting system, is it possible to borrow the GAC Early Warning Mechanism in the new gTLD program? This way, when it comes to public policies, GAC can also offer their suggestions through a necessary mechanism.

III. We also suggest the accountability proposal to reconsider the legitimacy and rationality of the proposed votes in the community voting system. The accountability proposal needs to clarify what elements need to be considered in terms of votes allocation and weight. We believe, in designing a voting system, the most important element that need to be considered is the representation of the global Internet community, instead of the representation of the ICANN community. Therefore, geographical balance should be an important element in terms of allocating the votes in the community; users' representation and the interests of developing countries should be properly considered too. For instance, Internet users in Asia exceed 1.4 billion, accounting for 45% of the world users. If there's no votes or extremely limited votes for Asian representatives, then this voting system is not appropriate.

IV. We would like to reiterate that: considering the importance of ICANN and PTI's operation over Internet's key resources and their responsibility to global public service, in order to further enhance the accountability and transparency, ICANN and PTI shall be separated from the US legal system so they would not be controlled or captured by a single nation or group. This idea shall be an important topic and trend for future development. Please add this topic into the process of enhancing ICANN's accountability, so as to provide a system guarantee for ICANN's globalization. Otherwise, the operation of ICANN and IANA functions would never reach true transparency and accountability.