



*Ministero dello Sviluppo Economico*  
*Istituto Superiore delle Comunicazioni e delle Tecnologie dell'Informazione*

**Italian Comments on the CCWG-Accountability Third Draft Proposal**

Italy welcomes the Cross Community Working Group (CCWG) Accountability Third Draft Proposal and wants to commend the CCWG-Accountability members and the Co-Chairs for their strenuous, hard and valuable work.

Furthermore, Italy welcomes the statement by the National Telecommunications Information Administration (NTIA) on 14 March 2014, announcing its "Intent to Transition Key Internet Domain Name Functions".

We are pleased to respond to the call for public comment on the third proposal and, in particular, the focus of our comments is on Recommendation #2.

In the various steps, the timeframe for the SOs and ACs to operating in the Escalation Process has been set in 7 or 15 days.

Italy wants to express its concerns on this time limit. Indeed, taking into account the sensitivity of the issues that could be dealt in the Escalation Process, we think that 7 or 15 days are timeframes absolutely inadequate for the GAC.

This time limit could seriously jeopardize the right of the GAC to exercise the Community Powers, preventing the full participation of governments in the new Community Empowered Mechanisms.

We want to restate that governments have primary, legal and political accountability for the protection public interest regarding public policy issues at national level.

For that reason, we ask the CCWG-Accountability to review the proposed time limit and to examine a new proposal with the GAC.

To conclude, we reaffirm our strong commitment to contribute to the reform of Internet Governance.

Yours sincerely,

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