

Commenter	Regarding which Recommendation	Comment	Response	Change	Where
ALAC	Overall Comment	The ALAC commends the subgroup and entire CCWG on ICANN Accountability for their work in producing this draft. The ALAC supports the draft as currently presented.	Thank you	N	N/A
ALAC	Recommendation 7 - Support for gender diversity in the office	Recommendation 7: While we acknowledge and support gender diversity, we also suggest that language diversity be considered in Staff resource configuration, to the extent practical.	The recommendation as currently written allows for this with ", and if possible other forms of diversity". As such we would consider this an implementation matter.	N	N/A
ALAC	Recommendation 11 - With input from across the community, ICANN should develop a policy for any Ombuds involvement in non-complaints work	Recommendation 11: We recognize that the items proposed will address important, high-level policies expected to be observed by the Office of the Ombudsman; therefore, we do not believe restricting the Ombudsman from certain activities (i.e. socializing) as suggested by certain members of the Community is a necessary detail to codify in such policy. We expect the Ombudsman would understand their role, hence would observe his/her duties accordingly; Community policing of the Ombudsman should not be a solution to fix a performance issue.	Thank you	N	N/A
GNSO-BC	Recommendation 1 - The Ombuds Office should have a more strategic focus.	Agree	Thank you	N	N/A
GNSO-BC	Recommendation 2 - The Ombudsman office should include procedures for handling different types of complaints, clarifying scope of role, and deepening understanding of Ombuds approach.	Agreed	Thank you	N	N/A
GNSO-BC	Recommendation 3 - soft re-launch of the function to all relevant parts of ICANN	Fully agreed.	Thank you	N	N/A
GNSO-BC	Recommendation 4 - Requirements for timely response to Ombuds requests.	Agreed	Thank you	N	N/A

GNSO-BC	Recommendation 5 - The ICANN Office of the Ombuds should establish timelines for its own handling of complaints and report against these on a quarterly and annual basis.	Agreed	Thank you	N	N/A
GNSO-BC	Recommendation 6 - The Office of the Ombuds should be configured so that it has formal mediation training and experience within its capabilities.	Comment: It is expected that anyone that would be engaged to handle this responsibility should have proven mediation skills and training. So, recommendation is agreed.	Thank you	N	N/A
GNSO-BC	Recommendation 7 - Support for gender diversity in the office	Comment: This recommendation is not clear. It is expected that an Ombudsman is a person and not persons and as such the question of choice of whom a complaint can be addressed does not arise. However, it should be part of the job requirements for the Ombudsman that he or she is not in any way biased, and this should be ascertained by review of past engagement of the potential Ombudsman. From time to time, a part time consultant could be retained by the office of the Ombuds. Qualifications, expertise, and experience should be the prevailing standard -- not the gender of those employed in the Office. Therefore, this recommendation may not be relevant.	The objective of the recommendation is straightforward and clearly stated: "The primary objective of this recommendation is to ensure that the community has choices as to whom in the IOO they can bring their complaints to and feel more comfortable doing so". How this is accomplished to the satisfaction of the community is deemed an implementation matter.	N	N/A
GNSO-BC	Recommendation 8 - ICANN should establish an Ombuds Advisory Panel.	Agreed	Thank you	N	N/A
GNSO-BC	Recommendation 9 - Revise Ombuds employment contracts to a five year fixed term; termination for cause only.	Comment: Agreed, but extension should be subject to a community-based feedback mechanism to the "Advisory Panel" covering Ombuds performance over the previous 5years.	This comment has been accepted as a change to the recommendation	Y	Rec 9
GNSO-BC	Recommendation 10 - Communications plan, including the formal annual report.	Agreed	Thank you	N	N/A

GNSO-BC	Recommendation 11 - With input from across the community, ICANN should develop a policy for any Ombuds involvement in non-complaints work	Fully agreed.	Thank you	N	N/A
GNSO-BC	The additional recommendation by the Transparency sub-group with respect to involving the Ombuds in the DIDP process should be considered using the criteria in recommendation 11. This specific point will be noted in the public comment process for this document to gauge if the community supports these additional recommendations when considering the criteria in recommendation 11.	Agreed.	Thank you	N	N/A
GNSO-IPC	Recommendation 1 - The Ombuds Office should have a more strategic focus.	The IPC agrees that Ombuds Office “should have a more strategic focus” (Recommendation 1), but urges WS2 to provide more detail in its finalized recommendations. A more strategic focus for the Ombuds Office should mean that, in its enhanced role, it has comprehensive understanding of ICANN’s unique structure and its role in supporting ICANN’s goals and viability.	The sub-group recommendations in most cases align perfectly or almost perfectly with the recommendations of the external evaluator. The only significant differences are where the external evaluator recommends changes to the Bylaws where the sub-group has removed this requirement and believes that the core of the recommendation as described in the external evaluator’s report can be implemented without Bylaws changes. A final determination of this should be considered an implementation issue.	N	N/A

GNSO-IPC	Recommendation 2 - The Ombudsman office should include procedures for handling different types of complaints, clarifying scope of role, and deepening understanding of Ombuds approach.	The IPC supports Recommendation 2 and agrees that the Ombuds Office should have procedures in place to categorize complaints and how each category should be handled; should set out which matters the Ombuds Office will not intervene in; and should provide illustrative examples that cover the most common controversies the Ombuds Office deals with.	Thank you	N	N/A
GNSO-IPC	Recommendation 3 - soft re-launch of the function to all relevant parts of ICANN.	The IPC supports the “soft launch” of the enhanced Ombuds Office across ICANN’s structure (Recommendation 3). The IPC commits to assist in educating its members when appropriate.	Thank you	N	N/A
GNSO-IPC	Recommendation 4 - Requirements for timely response to Ombuds requests.	Supports	Thank you	N	N/A
GNSO-IPC	Recommendation 5 - The ICANN Office of the Ombuds should establish timelines for its own handling of complaints and report against these on a quarterly and annual basis.	Supports	Thank you	N	N/A
GNSO-IPC	Recommendation 6 - The Office of the Ombuds should be configured so that it has formal mediation training and experience within its capabilities.	Supports	Thank you	N	N/A
GNSO-IPC	Recommendation 8 -	Supports	Thank you	N	N/A
GNSO-IPC	Recommendation 9 - Revise Ombuds employment contracts to a five year fixed term; termination for cause only.	Supports, We encourage a community feedback mechanism that feeds into the IOO as part of this process.	Thank you	N	N/A

GNSO-IPC	Recommendation 10 - Communications plan, including the formal annual report.	Supports	Thank you	N	N/A
GNSO-IPC	Recommendation 11 - With input from across the community, ICANN should develop a policy for any Ombuds involvement in non-complaints work.	Supports. However, we request further detail as to what "non-complaint work" the Ombuds Office would be involved with in ICANN.	This is intentionally left open so that the criteria apply to any additional responsibilities which would be considered for the Ombuds.	N	N/A
GNSO-NCSG	Overall Comment	The Ombuds Office procedures should be set through consultation with the community.	This should be considered in implementation.	N	N/A
GNSO-NCSG	Overall Comment	The NCSG is not satisfied that the independence of the Ombuds Office has been sufficiently addressed. The NCSG does not believe that the problem of independence of the Ombuds persons can be solved with 5-year fixed-term contracts. If the meaning of this recommendation is that the Ombuds office, as an external entity, should be given a fixed-term contract, the NCSG supports this suggestion. However, if this refers to individual Ombudspersons, the issue of independence will remain. Since the Ombudsperson directly receives her/his revenue from ICANN, the fixed-term contract does not eliminate economic incentives that can potentially hamper the ombuds' independence. It also does not preclude the Ombudsperson from taking up employment after their fixed-term contract ends with a stakeholder in the domain name industry.	This is the only commenter which is unsatisfied with the proposed improvements to make the Ombuds more independent. As such the sub-group did not propose any change to address this comment.	N	N/A
GNSO-NCSG	Overall Comment	We think that the accountability and independence of the Ombuds could only be maintained if it is an office and not a person. At present, the Ombuds is an ombudsperson. We suggest that to ensure and maintain the independence of the office, the best way would be to use an external organization that provides ombuds services and does not have ICANN as its sole source of revenue.	This is the only commenter which is unsatisfied with the proposed improvements to make the Ombuds more independent. As such the sub-group did not propose any change to address this comment.	N	N/A
GNSO-NCSG	Overall Comment	The NCSG believes that the report is missing one very important point about independence and accountability of Ombuds office. We think that under no circumstances should the Ombudspersons socialise and befriend community members. This is a very obvious independence element which, unfortunately, has not made it into the report. We suggest the subgroup to consider the situation when the decision maker of someone's case at a social event is talking and smiling at the party, which has a complaint filed against them. Independence is seriously affected by social encounters and interactions. We believe that the final report should include a recommendation for the Ombudsman's office to consult the community to establish appropriate rules around socialization and interactions so/as not to compromise their	This is the only commenter which is unsatisfied with the proposed improvements to make the Ombuds more independent. Additionally other commenters rejected this specific request for a change to address this. As such the sub-group did not propose any change to address this comment.	N	N/A

GNSO-NCSG	Recommendation 4 - Requirements for timely response to Ombuds requests.	In regards to recommendation 4, which requires the community to respond to the Ombuds office in due time with reasoning, we believe such a responsibility should be mutual. The timeliness of the Ombuds Office actions should be preserved (as is indicated in recommendation 5) and the office must provide reasons for its decision. Also, if the responding party requests for additional extension in case of exceptional circumstances as mentioned in the Recommendation 4, the additional extension granted by the Ombuds Office should not be more than 30 days.	Thank You.	N	N/A
GNSO-NCSG	Recommendation 4 - Requirements for timely response to Ombuds requests.	The nature of the Ombuds office decisions are non-binding, but such nature has to be clarified. In recommendation 4 suggests, the community has to respond to Ombuds Office inquiries. We agree that the community, and ICANN the organization, must respond to reasonable Ombuds Office inquiries, but not to be obliged to comply with the decisions of the Ombuds Office (as stated in the report). Moreover, the procedure for if a decision of the Ombudsman's office is not complied with should be clarified in the Ombuds Office procedures.	This recommendation is only about replying to requests by the Ombuds and does not cover complying with any Ombuds decisions. The Ombuds office as currently structured cannot compel anyone to comply with its recommendations.	N	N/A
GNSO-NCSG	Recommendation 7 - Support for gender diversity in the office	We would also like to raise our concern about recommendation 7, which currently reads as: "Recommendation 7. The Office of the Ombuds should be ideally configured (subject to practicality) so that it has gender diversity within its staff resources". The CCWG plenary discussed this issue and agreed that recommendation 7 removes the term "subject to practicality". The sub-group rapporteur was suggested to change the language to: "... The office of the ombuds should be ideally configured so that it has gender, and if possible other forms of diversity within its staff resources" (Transcript of the meeting, page 19). This suggestion was supported by the group. We do not see this change reflected in the final report which was put up for public comment.	This is indeed an error - this was in "strike through" in the executive summary of the document but not in the main body of the document where the recommendations can be found. This has been corrected	Y	Rec 7

GNSO-RYSG	Recommendation 4 - Requirements for timely response to Ombuds requests.	<p>With respect to Recommendation #4 (requiring groups to respond to a formal request or report from the Ombudsman within 90 days, with the ability seek a 30-day extension from the Ombudsman), the RySG does not support the Ombudsman's ability to issue such 'orders' as drafted. The RySG is aware of the requirement under ICANN bylaws that the Ombudsman have access to necessary information and records from ICANN staff and constituent bodies to enable an informed evaluation of complaints and to assist in dispute resolution where feasible. But while committed to ensuring the Ombudsman has timely information, the RySG retains discretion to allocate its resources (including demands on volunteer time) as it deems best in balancing important calls on its input. Ombudsman-issued deadlines are inconsistent with that principle and would be unworkable.</p> <p>With respect to Recommendation #4's requiring a substantive response to the Ombudsman, the RySG notes, for purposes of clarity, that it retains the discretion to decide which information and records, if any, are 'necessary' to respond to Ombudsman requests. As such, the RySG recommends striking Recommendation #4 as the current Bylaws sufficiently require constituent bodies to cooperate without granting the Ombudsman the unfettered ability to make unreasonable requests in what could be unreasonable time frames.</p>	The objective of the recommendation is straightforward and clearly stated: "The primary objective of this recommendation is to ensure that the community has choices as to whom in the IOO they can bring their complaints to and feel more comfortable doing so". How this is accomplished to the satisfaction of the community is deemed an implementation matter.	N	N/A
GNSO-RYSG	Recommendation 11 - With input from across the community, ICANN should develop a policy for any Ombuds involvement in non-complaints work.	With respect to Recommendation #11 (regarding the Ombudsman's efforts in "non-complaints work" – including involvement in policy design), the RySG has a concern about clarity. The role of the Ombudsman is to act as a neutral dispute resolution practitioner. While the Ombudsman may accept "questions" in addition to complaints, it should be made clear that the Ombudsman does not have free rein to formally engage in policy development unless, and to the extent that, the Ombudsman is formally asked to do so by a policy development process. The RySG believes that any level of Ombudsman activity in a policy design process, if and as so requested, should be given 'as-is' without any implication of stamp-of-approval.	The sub-group believes the recommendation covers this adequately especially when considering that any changes must be clarified publicly prior to implementation.	N	N/A
ICANN Board	Overall Comment	We note that the recommendations in this report are largely based on the external evaluator's recommendations provided to ICANN organization and the Ombuds Subgroup in July 2017. Clarity is needed as to whether the CCWG- Accountability intends for its recommendations to overtake the work of the external evaluator, or if other aspects of the external evaluator's report still stand. For example, the CCWG-Accountability's recommendations state that no changes are needed to the Bylaws relating to the Ombudsman. The external examiner, however, recommends that a more strategic focus start through clarifying the language in the Bylaws.	The sub-group recommendations in most cases align perfectly or almost perfectly with the recommendations of the external evaluator. The only significant differences are where the external evaluator recommends changes to the Bylaws where the sub-group has removed this requirement and believes that the core of the recommendation as described in the external evaluator's report can be implemented without Bylaws changes. A final determination of this should be considered an implementation issue.	N	N/A

ICANN Board	Overall Comment	<p>To the extent that the CCWG-Accountability is focused on the speed of implementation and hopes to avoid any Bylaws modifications or changes to the Ombudsman Framework, the ultimate focus should be on the proper implementation of recommendations in order to hold ICANN accountable to meeting their intent.</p> <p>While a majority of the recommendations appear to be reasonable and productive enhancements to strengthen the office of the Ombuds, a few recommendations would benefit from additional clarification noted below. Specifically, recommendations on the notion of diversity of staff available to the Ombuds office (Recommendation 7), the proposal for an Advisory Panel (Recommendation 8), and the term of the Ombuds contract (Recommendation 9) raise important concerns for consideration.</p> <p>Based on inputs from the Ombuds, we understand that the current Office of the Ombuds already has activities in place that might address some part of the recommendations as issued. In addition, the Ombuds has already started considering how some of the recommendations could be reached. For example, one way to deepen the understanding of the role and work of the Ombuds could be achieved through more regular communications, such as blog postings and other informative communications. Similarly, there are already reporting mechanisms in place, though those might be able to be better publicized or refined.</p>	Thank You.	N	N/A
ICANN Board	Overall Comment	<p>The implications on resources is an important overarching consideration that should be considered for these and all recommendations. As a general observation, ICANN operates within a specific budget based on limited funding. Recommendations that add costs to ICANN's operations result in the organization making trade-offs with other items, such as implementation of new policies, or innovation of existing programs or services. Such policies, without considering the impact on resources, may lead to a situation where the organization is unable to effectively meet community expectations with either the new recommendations or existing obligations.</p> <p>The CCWG-Accountability should consider these factors and provide guidance in its final report regarding the priority, importance, and extent these recommendations (and all the CCWG's recommendations) should be implemented, and in what timeframe.</p>	Prioritization and funding for implementation of recommendations is beyond the scope and capacity of WS2 and rests with ICANN and the community. The CCWG-Accountability-WS2 proposes to establish a small implementation team to assist ICANN and the community to ensure the implementation plan preserves the spirit of the recommendations and provide any interpretation advice as required.	N	N/A

ICANN Board	Recommendation 1 - The Ombuds Office should have a more strategic focus.	<p>While the concept of having a more strategic focus is sound, there is not a lot of detail in the report as to what that means. The report seems to reject the external evaluator's recommendation on developing a more strategic focus through Bylaws language. Clarification on what is intended here will be helpful. Regarding Recommendation 4: Required timelines for response The recommendations seem to propose very detailed deadlines by which the Board and other members of the community must respond to requests and reports. It is unclear what issue is being solved here. There may be for example, certain reports which require more information to fully understand the nature of the dispute and status and resolution. How would these deadlines work in practice with the rest of the community? What is the outcome if a deadline is not met? The current Ombuds has also informed the Board that the 30-day response timeframe currently in place for the ICANN organization's inputs into reports has worked well.</p>	<p>The sub-group recommendations in most cases align perfectly or almost perfectly with the recommendations of the external evaluator. The only significant differences are where the external evaluator recommends changes to the Bylaws where the sub-group has removed this requirement and believes that the core of the recommendation as described in the external evaluator's report can be implemented without Bylaws changes. A final determination of this should be considered an implementation issue.</p>	N	N/A
ICANN Board	Recommendation 7 - Support for gender diversity in the office	<p>Per the report, the primary objective of this recommendation is to ensure that the community has choices as to whom in the Ombuds Office the community can bring their complaints and feel more comfortable doing so. The ICANN Board agrees that consideration needs to be given on the availability of alternative resources for the Ombuds Office. While ICANN is not able to make employment decisions based on considerations such as gender, nationality, or many other protected characteristics, there are likely ways to coordinate adjunct resources to making available to the community additional, more diverse points of entry into the Ombuds Office, that can be implemented. As a preliminary note, ICANN has already provided additional inroads into the Ombudsman office. For example, female members of the senior leadership of ICANN have served as a first point of contact to raise complaints regarding harassment, where the complainant didn't feel comfortable going directly to the Ombuds. There are other inroads as well, such as the Complaints Officer, or members of ICANN's executive team that can be an initial point of contact for comfortably expressing complaints that can then be brought to the Ombuds. There might also be a need for consideration of how cultural differences impact the Ombuds Office's consideration of any individual matter, and whether supplemental resources are necessary to better serve the ICANN community.</p> <p>The current Ombuds has informed the Board that he is developing a community liaison network of trusted volunteers from the constituencies to act as complaint intake for anybody who is uncomfortable approaching the Ombuds directly. We hope this is also serves as a way to address this community concern. Additional information is needed to consider the full scope of the recommendation and any potential budgetary impact. If this recommendation seeks to have ICANN have a bigger staff in the Ombuds Office, as opposed to identifying other ways to have supplemental resources</p>	<p>The objective of the recommendation is straightforward and clearly stated: "The primary objective of this recommendation is to ensure that the community has choices as to whom in the IOO they can bring their complaints to and feel more comfortable doing so". How this is accomplished to the satisfaction of the community is deemed an implementation matter.</p>	N	N/A

ICANN Board	Recommendation 8 - ICANN should establish an Ombuds Advisory Panel.	<p>The recommendation to include an advisory panel is a significant change, and does not seem appropriate for implementation at this time. The Board suggests that focusing on how the Ombuds Office can be strengthened should come first, and then consideration can come later as to whether additional advisory mechanisms are needed. When reading this recommendation, the Board identified many of questions that support this conclusion. These include:</p> <ul style="list-style-type: none"> <li>- What is the role of the broadly powered Advisory Panel in relation to the proper role of ICANN org and the Board with respect to the Office of the Ombuds?</li> <li>- What is the scope of advice that the Advisory Panel is to give the Ombuds, outside of involvement on non-complaint work? Or, does the Advisory Panel only have power to contribute to the hiring, firing and evaluation of the Ombuds Office?</li> <li>- How does the notion of an Advisory Panel with powers relating to selection and termination of candidates work in practice with the Section 5.2 of the ICANN bylaws, which requires the Office of the Ombuds to be independent. Is it foreseen that there is a bylaw change here?</li> <li>- Would the Advisory Panel be purely advisory or more of 'wise counsel'?</li> <li>- How would the proposal work with Section 5.1(c) of the Bylaws, which require 3/4s vote of the entire Board to dismiss the Ombudsman? What weight would the Board put in such Advisory Panel's recommendations on termination?</li> <li>- How is the expertise of the Advisory Panel assessed in relation to the tasks it to undertake in relation to the Ombudsman?</li> <li>- How can the Ombuds retain the confidentiality obligations per the ICANN Bylaws, with the role of the Advisory Panel?</li> <li>- Is the 5-year evaluation cycle intended to replace the role of the Accountability and Transparency Review Team in assessing the Ombudsman as part of ICANN's</li> </ul>	<p>– Quoting the external evaluator's report: "There is a clear need to strengthen the perception of the Ombuds function's independence. We recommend the addition of an Ombuds advisory panel – independent of the Board - to take some of the oversight work currently done by the Governance Committee and to add a system of guidance and support for the Ombuds. We also suggest some detail change to the Ombuds employment.". As such the recommendation of the sub-group is a direct adaptation of this recommendation. It is also important to note that the ICANN Organization requested that the Ombuds sub-group of the CCWG-Accountability take on oversight of the external evaluation, which it accepted to do, and that the administrative selection process for an evaluator was managed by the ICANN Organization to ensure the quality and depth of the resource to undertake this work. Given this context and the only negative comment for the recommendation in the public comments being from the Board the sub-group chose to maintain its recommendation</p>	N	N/A
ICANN Board	Recommendation 9 - Revise Ombuds employment contracts to a five year fixed term; termination for cause only.	<p>The Board understands the reasoning behind the recommended changes to the Ombuds employment contract, but is concerned that the creation of a 5-year fixed term contract with strict termination limitations may not provide motivation for high performance from the Ombuds. It should be a collective goal across ICANN that the Ombuds strive for exemplary performance in service to the ICANN community, and not be rewarded through keeping a contract because the minimum performance levels have been met. Similarly, if the Ombuds is doing a good job and is gaining trust and expertise, why would there be a recommendation to only extend his/her term for up to 3 years? Further, the current Ombuds has reported to ICANN that he does not view this recommendation as a means to promote or protect the independence of the office.</p> <p>The CCWG-Accountability might consider alternative ways of addressing issues it is seeking to solve, so as to not discourage high quality Ombuds and experience. It may be preferable to retain Ombuds compensation based on some objective criteria, such as delivery on the reporting goals detailed in recommendation 10 of this report.</p>	<p>Quoting the external evaluator's report: "We also think that the Ombuds at-risk performance pay is seen to diminish apparent independence, however would be much less so if in the hands of the Panel. Typically, external ombuds functions are subject to periodic independent review (usually every 3-5 years). This is a mechanism designed to balance the need for an ombuds to have independence and autonomy in handling day-to-day matters with some accountability to the community." As such the recommendation of the sub-group is a direct adaptation of this recommendation. It is also important to note that the ICANN Organization requested that the Ombuds sub-group of the CCWG-Accountability take on oversight of the external evaluation, which it accepted to do, and that the administrative selection process for an evaluator was managed by the ICANN Organization to ensure the quality and depth of the resource to undertake this work. Given this context and the only negative comment for the recommendation in the public comments being from the Board the sub-group chose to maintain its recommendation.</p>	N	N/A

ICANN Board	Recommendation 11 - With input from across the community, ICANN should develop a policy for any Ombuds involvement in non-complaints work.	The guidance detailed in the report is a strong enhancement and clarification for the Ombuds function, and the Board supports this recommendation. We note that an interdependency exists between this work and the work of the Transparency Subgroup. The Transparency Subgroup recommends some specific involvement of the Ombuds in the DIDP process. To the extent the Transparency recommendation is an expansion of the role of the Ombuds, it would be valuable to apply this criteria to the Transparency report recommendation to consider requests to expand the Ombuds role.	Thank You.	N	N/A
INTA	Overall Comment	While we generally support the recommendations, we do have specific comments regarding the efficiency and transparency of the IOO. Our concerns focus on the response times proposed in recommendation 4 and to a general question of enforcement mechanisms available to the IOO.	As currently configured the Ombuds has no ability to enforce anything it is responsible for. None of the recommendations in the report change this.	N	N/A
INTA	Recommendation 4 - Requirements for timely response to Ombuds requests.	<p>While a mandatory response time is welcome and the process described above is positive, in INTA's view the response time should be significantly shortened. A lengthy process may deter members of the community from seeing assistance from the IOO. For the IOO to have a meaningful role, it must have the power to act and address issues more quickly and efficiently. INTA recommends that the response time be shortened to 60 days with a possible 30-day extension due to exceptional circumstances. A full, fair and expeditious review of the matter at issue will go a long way strengthening the ombuds functions.</p> <p>Additionally, it is unclear from the Recommendations what, if any, enforcement mechanisms are available to the IOO. In fact, there is no discussion as to whether the IOO should have any enforcement powers or mechanisms. INTA recommends that the working group examine reasonable and appropriate mechanisms of enforcement that may be delegated to the IOO. INTA recognizes that, today, the ombuds functions are not independent from ICANN org.</p> <p>Therefore, enforcement may be limited to what ICANN org may implement. If enforcement mechanisms are deemed to be beyond the scope of the IOO then, at a minimum, it may be useful to map how matters resolved by the IOO may be referred to appropriate bodies for enforcement as appropriate.</p>	This recommendation is only about replying to requests by the Ombuds and does not cover complying with any Ombuds decisions. The Ombuds office are currently structured cannot compel anyone to comply with its recommendations.	N	N/A