

IRP Draft Supplemental Procedures Public Comment Analysis

Support for 45 day deadline	
Nobody? Support “for balancing celerity and due process” - 1 respondent	ALAC
Support in principle for a fixed time bar of (e.g.) 12 months	
1 respondent	Hill
45 days is too short	
8 respondents	AFNIC (180 days); Auerbach (180 days); NCSG (180 days); INTA (90 days); Hill (90 days) RySG (eliminate); ISPCP; DotMusic; LINX
Additional reasoning: 45 days constitutes bias – 3 respondents	Auerbach; LINX; NCSG
The “fixed limit” (12 months) is wrong in principle	
7 respondents	Sullivan, Rosezweig, CCG Delhi, NCSG, DotMusic, BC, LINX
Additional reasoning: Ensure mission limits 3 respondents	Rosenzweig, NCSG, LINX (extended example)
No deadline if ICANN violates core principles – 2 respondents	Auerbach, LINX
Conflicts with bylaws / every valid complaint should be heard 3 respondents	Rosenzweig, CCG Delhi, LINX
ICANN policy process takes years 8 respondents	Rosenzweig, NCSG, ISPCP, BC, CCG Delhi, INTA, Dotmusic, LINX
Differentiate policy and administrative decisions – Policy and facially invalid actions	Hill (?), NCSG BC, CCG Delhi
12 months constitutes bias	NCSG

12 months is too short	
5 respondents	Auerbach, Rosenzweig, INTA (2 years), RySG, BC (remove, or min 3 years)
12 months constitutes bias	NCSG
Definitions	
Calendar or business days?	Auerbach
Exclude days for intermediation?	RySG
IOT Process / Next steps	
Moratorium and study	BC, ISPCP
Systematically review/tie to bylaws, new public consultation	LINX
Review effect	ALAC
Other recommendations	
All notice periods, deadlines must be based on dates translated documents available	Perez
IRP should have discretion to hear late claims	LINX
Other arguments	
No justification / arbitrary by IOT	BC, LINX
Limited IRP remedies protect ICANN, make lax time bar tenable	LINX
Abolishing 1 yr would still leave an effective time bar	LINX
Date of implementation insufficient	Rosenzweig, NCSG