

DRAFT ALAC Response to: The Independent Review of the ICANN At-Large Community - Draft Report for Public Comment

v06 – 22 February 2017

E-MAIL/Wiki Comments: ONLY THOSE FROM AT-LARGE COMMUNITY MEMBERS WILL BE CONSIDERED
Google Doc Comments: ONLY THOSE FROM LOGGED IN AT-LARGE COMMUNITY MEMBERS WILL BE CONSIDERED.

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1. Introduction

The ALAC appreciates the commitment of the Review Team and the factoring in of the comments provided by the WP and community to the first draft report resulting in this version.....

~~Still to be done:~~

- ~~• Comments of faulty methodology and lack of logical connection between analysis and recommendations~~
- ~~• Comments on conclusions that did not become a recommendation in this version, but could in the future (such as NomCom appointees being the AC/SO Liaisons, Random selection of Rapporteurs, multi-meeting funding based on minimal commitment, Council of Elders, lack of turnover, etc.).~~

28 **2. Comments on Recommendations**

29 **Recommendation 1: At-Large Members from each region should be encouraged, and where**
30 **possible funded, to participate in Internet governance / policy-related conferences / events**
31 **(IGF, RIR ISOC) in their region, and to use these events as opportunities proactively to raise**
32 **awareness among end- users about the At-Large and the opportunities to engage in ICANN-**
33 **related activities.**

34
35 **ALAC Response:** The ALAC supports this recommendation and notes that this is effectively today’s status
36 quo, although “where possible funded” is not often the case. Other than CROPP funding which is
37 extremely limited, if “outreach” is listed as a motivation for other funding, the likelihood of the funding
38 being approved decreases markedly. Note that this notwithstanding, we do on occasion hold events in
39 parallel with such other Internet Governance events – See response to recommendation 11.

40

41 **Recommendation 2: At-Large should be more judicious in selecting the amount of advice it**
42 **seeks to offer, focussing upon quality rather than quantity.**

43

44 **ALAC Response:** The ALAC supports this recommendation and notes that it is the status quo. Records
45 over the last five years demonstrate this.

46

	2012	2013	2014	2015	2016
ICANN Public Comments	62	59	53	51	46
ALAC Responses	35	32	28	20	16
% Responded	56%	54%	53%	39%	35%

47

48 A small proportion are just “good work” or “we support” – places where we felt such a nominal
49 response was advisable but the issue did not warrant any substantive effort on the part of At-Large.
50 These statements are nonetheless included in the count of ALAC Responses.

51 Advice to the Board is a very small part of the overall comments. In the past three years, only X such
52 statements were made. At some level, the need to submit advice to the Board is an indication of failure
53 in that it is far more preferable to influence the policy recommendation of other decisions before they
54 come to the Board than to advise the Board after the fact, at a time when it may have little latitude to
55 alter the outcome.

56 **Recommendation 3: At-Large should encourage greater direct participation by At-Large**
57 **Members (ALMs) in ICANN WGs by adopting our proposed Empowered Membership Model.**

58

59 **ALAC Response:** The ALAC supports the analysis indicating that we would like and in fact need more

60 participation from the periphery of At-Large. Moreover, this was clearly stated to the Review Team. The
61 issue has been the subject of an ongoing Task Force within At-Large over the last year (one of the
62 frowned-upon inward-looking activities). It is unfortunate that the Review Team was aware of this effort
63 and chose not to mention that it was ongoing and was at the stage where a framework for addressing
64 the issue was adopted by the ALAC in Hyderabad, well before the issuance of this report.

65
66 The ALAC strongly disagrees with the proposed recommendation, not because, as characterized in the
67 report, we are defending our privileged positions and afraid of any change, but rather because the
68 proposal has a number of apparent critical flaws that the Review Team were asked to address and have
69 chosen not to.

70
71 Some of these will be addressed later in this comment, but the most important one is that there is no
72 explanation of why, the announcement of the Empowered Membership Model (EMM) will result in
73 greater participation. The EMM is roughly equivalent to the Individual Member class of participation in
74 three of the five RALOs. The only substantive difference is that upon successfully completing and initial
75 period (with no methodology presented for judging completion), Empowered Members will have the
76 right to vote for leaders or on other actions, should a vote ever be initiated.

77
78 No evidence is presented as to why the vote-empowered membership will be orders of magnitude more
79 attractive to users world-wide, or why the ongoing potential to vote will encourage people to actively
80 participate in what has been acknowledged as a complex, and time-intensive space. Moreover, many of
81 these users are not fluent in English which is the language used for most of these activities and no
82 proposal is presented on how that might be overcome.

83
84 As noted, this document will return to these questions when addressing other Recommendations and
85 Implementations.

86

87 **Recommendation 4: At-Large Support Staff should be more actively involved in ALM**
88 **engagement in policy work for the ALAC, drafting position papers and other policy related**
89 **work.**

90

91 **ALAC Response:** The ALAC agrees with the recommendation. In fact, the ALAC has started doing this
92 over the last year. Utilizing the relatively limited resources available, an ICANN At-Large Staff member
93 has edited and “cleaned up” documents drafted by volunteers and in several cases have created the
94 initial draft based on instructions from community members. Similarly, but on a larger scale, staff will be
95 the main content creators of the planned regular messages outlining policy activity to be sent to
96 individual and ALS members. This is of course dependent on ICANN management making the
97 appropriate resources available, as volunteers have no direct control, but we are optimistic that this will
98 be done.

100 **Recommendation 5: At-Large should redouble efforts to contribute to meetings between**
 101 **ICANN Senior Staff and Executives, ISOC (and other international I* organisations) to engage**
 102 **in joint strategic planning for cooperative outreach.**

103

104 **ALAC Response:** As desirable as such an approach sounds, it is not known to At-Large when and where
 105 ICANN Senior Staff and Executives, ISOC (and other international I* organizations) meet, and although
 106 At-Large leadership would be delighted to participate in such events, they are not typically invited.
 107 Certainly at the last known enclave of these organizations, At-Large did not have a presence.

108 The lack of participation at the ICANN executive level does not inhibit cooperation with other
 109 organizations at the ALAC and RALO level. For an example, see response to recommendation 11.

110 **Recommendation 6: Selection of seat 15 on ICANN Board of Directors. Simplify the selection**
 111 **of the At-Large Director. Candidates to self-nominate. NomCom vets nominees to produce a**
 112 **slate of qualified candidates from which the successful candidate is chosen by random**
 113 **selection.**

114

115 **ALAC Response:** The ALAC rejects this recommendation. There is no question that the process followed
 116 by the At-Large Community (ALC) to select the occupant of Board seat 15 is more complex than the
 117 processes used by the Supporting Organizations for their selections. However, it is patterned closely on
 118 the process used by the Nominating Committee to select their directors. Moreover, this process was
 119 arrived at after an extensive bottom-up design process. The process has been modified several times
 120 using ALAC RoP amendment procedures, and it may well be modified again in the future. Perhaps it will
 121 even be simplified, if that is the will of the community. It is the position of the ALAC that neither the At-
 122 Large Independent Reviewer nor the Board Organizational Effectiveness Committee nor the ICANN
 123 Board itself has the standing to instruct the At-Large Community how to select its Director. In fact, since
 124 any such instruction would ultimately come from the Board, it would be in a very clear conflict of
 125 interest if it were to do so.

126

127 The concept that the “Director nominated by the At-Large Community” (a quote from the ICANN
 128 Bylaws) should be partially selected by the Nominating Committee and then by random selection cannot
 129 be taken seriously.

130

131 For the record, the ALC process does include an option of random selection if all else fails, but in that
 132 case, it is a random selection between two candidates that have already received strong support from
 133 the ALC either through the Board Candidate Evaluation Committee (made up of members of the ALC –
 134 excluding the ALAC) and possible one or more field-narrowing votes.

135

136 The other alternative suggested by the Review Team (but not recommended) is to revert to a selection
 137 process akin to the 2000 At-Large Board selection process. This is a process explicitly rejected by the
 138 bottom-up group that designed the current process and was rejected by the ICANN Board when ICANN

139 was re-designed in 2002. It is not the place of an external reviewer to override these processes. Should
140 the overall community one day decide to follow that process, it will do so without being compelled to do
141 so.

142
143 **Recommendation 7: At-Large should abandon existing internal Working Groups and**
144 **discourage their creation in the future, as they are a distraction from the actual policy advice**
145 **role of At-Large.**

146
147 **ALAC Response:** The ALAC rejects this recommendation. Working Groups (WGs), under a number of
148 names, are the core way that ICANN and its constituent parts come to agreement and makes decisions.
149 The ALAC has WG for a number of reasons, and strongly defends its right to do so.

150 The uses of WGs include:

151 Policy Related: These groups are used to build policy recommendations and advice, merging and
152 melding differing opinions and ensuring that all parties can contribute and that the final statements are
153 supported by the ALAC and the RALOs which appoint 10 of the 15 ALAC Members. Such groups have
154 been critical to the ALACs ability to very effectively contribute to the New gTLD Process, the IANA
155 Stewardship Transition Plan, and the new Accountability measures. These groups are generally open to
156 all participants in At-Large. The Public Interest WG is the newest such group, which will be working to
157 support ICANN-wide efforts attempting to understand the meaning and implications of the public
158 interest in ICANN’s context.

159 Administrative Tasks: These WGs, which may be convened at special times or are standing, carry out
160 tasks on behalf of the ALAC, at times referring issues aback to the ALAC, and at other times charged with
161 making decisions on behalf of the ALAC. In most cases, these groups include (or are restricted to)
162 appointees from RALOs so that critical decisions are not restricted to “the usual gang of suspects”.
163 Often, these RALO appointees are relatively new to At-Large and this constitutes one of the stepping
164 stones into leadership positions (both for them to get experience, and to be judged). Tasks include:
165 triage of volunteers to a variety of positions within the ALAC or other groups within ICANN that we are
166 required to appoint people to or endorse them for; advice and decisions on ICANN special budget
167 requests; advice and decisions on CROPP requests; deliberation and advice on outreach; deliberation
168 and development of capacity building programs.

169 Environment Enhancement: As the reviewers have noticed, there are many tools available from which
170 we can choose to do our work. Recommendation 10 suggests one such example and Recommendation 8
171 suggests others. In a bottom-up organization, we cannot have a “Tool Czar” simply passing down edicts
172 of what we should do. We have WG which address such needs including: Tools (such as messaging and
173 conference), translation, captioning; Social Media, Accessibility (ensuring that those with disabilities can
174 participate equitable). Several of these have been sufficiently successful that they have, or are in the
175 process of, transitioning to ICANN-wide projects (ICANN Academy, Accessibility, Captioning).

176 **Recommendation 8: At-Large should use social media much more effectively to gather end**
177 **user opinions (Twitter poll/Facebook polls, etc).**

178
179 The ALAC supports this recommendation and already has a Social Media Task Force that is developing
180 such uses of Social Media (one of the inward-looking WGs that are recommended to be abolished).

181 **Recommendation 9: At-Large should consider the appointment of a part time Web**
182 **Community Manager position. This member of the support staff could either be recruited, or**
183 **a member of the current staff could be specially trained.**

184
185 The ALAC supports the intent of this recommendation. We note that it is beyond the scope of the At-
186 Large volunteer community to take such action.

187
188 However, there are some aspects of the analysis for this recommendation that need clarification.

- 189 • There is an implication that we need ICANN needs to hire staff in lieu of volunteers working on
190 the web site. ALL support of the site is performed by ICANN employees. Broken links also fall
191 under ICANN staff.
- 192 • The quote from the GNSO participant is slightly misleading in that it says there is a search issue
193 with “most” ICANN sites. In fact, it is virtually universal, and a well-known problem. The worst
194 example is the GNSO web site and Wiki where it is virtually impossible to track the history of
195 policy development in most cases. ICANN hired a professional librarian to start addressing this
196 issue a year ago, but sadly that person has now left and we are starting over again.

197 **Recommendation 10: Consider the adoption and use of a Slack-like online communication**
198 **platform. An instant messaging-cum-team workspace (FOSS) alternative to Skype/Wiki/**
199 **website/ mailing list.**

200
201 **ALAC Response:** The ALAC supports the intent of this recommendation. We note however that we are
202 subject to a number of constraints.

- 203 • At-Large cannot unilaterally start using tools that are not supported by ICANN. We cannot
204 depend on volunteer technical support and so must rely on ICANN IT, which adds an additional
205 level of vetting and bureaucracy.
- 206 • We have community members all around the world, some with very low and/or very expensive
207 bandwidth (and ICANN will not subsidize such access for volunteers). Often ONLY the older tools
208 will function effectively or cost-effectively.
- 209 • We have community members in locations where their national governments block access to
210 certain services and tools.

211 **Recommendation 11: At-Large should replace 5-yearly global ATLAS meetings with an**
212 **alternative model of annual regional At-Large Meetings.**

213
214 **ALAC Response:** The ALAC accepts this recommendation is a modified form. Specifically to augment the
215 5-year global ATLAS meetings with regional meetings – General Assemblies (GA) interspersed between
216 the ATLAS meetings. This is the status quo.

217

218 The Review Team seems to have misunderstood the methodology associated with the 5-Year Global
219 ATLAS meetings. These are not the only gatherings that we host. In between such global meetings, we
220 also have regional meetings of exactly the form that the Review Team is recommending. After doing this
221 on an ad hoc basis for the last eight years, ICANN has recently agreed to formalize the process and
222 integrate it into its normal planning and budgeting process. The proposal can be found at
223 <http://tinyurl.com/At-Large-GS-Summit>.

224
225 The regional meetings are not necessarily held during the “C” meeting (that term is no longer used,
226 replaced by the original Annual General Meeting). The exact scheduling of a General Assembly (or Atlas)
227 depends on many variables: type of meeting; venue capabilities and cost; other ICANN events planned
228 (such as GAC high-level ministerial meeting) and availability of volunteers and staff to plan the event. At
229 times, a GA may be held in parallel with a non-ICANN even. The upcoming NARALO GA will be held in
230 conjunction with an ARIN meeting.

231

232 **Recommendation 12: As part of its strategy for regional outreach and engagement, At-Large**
233 **should put a high priority on the organisation of regional events. The five RALOs should, as**
234 **part of their annual outreach strategies, continue to partner with well-established regional**
235 **events involved in the Internet Governance ecosystem. CROPP and other funding**
236 **mechanisms should be provided to support the costs of organisation and participation of At-**
237 **Large members.**

238

239 **ALAC Response:** The ALAC supports this recommendation. As the use of the word “continue” implies,
240 this is already an ongoing practice and subject to ICANN funding, it will continue and hopefully grow.

241

242 **Recommendation 13: Working closely with ICANN’s Regional Hubs and regional ISOC**
243 **headquarters, At-Large should reinforce its global outreach and engagement strategy with a**
244 **view to encouraging the organisation of Internet Governance Schools in connection with**
245 **each At-Large regional gathering.**

246

247 **ALAC Response:**

248

249 Notes:

- 250 • Only two regional Hubs
- 251 • APAC Hub very supportive of APRALO
- 252 • Is there any RALO cooperation with the EMEA Hub in Istanbul?
- 253 • I am not aware of cooperation between LA Head Office and NARALO other than through Heidi in
254 her normal support of At-Large
- 255 • We do support the concept of IGS, but unclear to what extent we could do more within ICANN’s
256 mission.

257

258 **Recommendation 14: In the interests of transparency, all At-Large travel funding should be**
259 **published as a “one stop shop” contribution to the At-Large webpage.**
260

261 **ALAC Response:** Although the decision to make such information available is out of scope for the ALAC,
262 The ALAC supports this with the understanding that a similar policy being applied for the entire
263 organization including the SOs and the Board (some Board cumulative numbers are published but with
264 little granularity) and staff. ICANN regularly publishes the travel costs for ICANN meetings and events
265 directly associated with them, but not for other activities (excluding the Board and staff). Staff costs are
266 published only to the extent that they are required for senior executives under US tax law. Recently, in
267 order to discover the costs of the annual GNSO Non-Contracted House Intersessional meetings, a formal
268 Documentary Information Disclosure Policy request had to be filed
269 (<https://www.icann.org/resources/pages/didp-20160211-1-rrsg-request-2016-03-14-en>).

270 **Recommendation 15: At-Large should be involved in the Cross-Community Working Group**
271 **on new gTLD Auction Proceeds and initiate discussions with the ICANN Board of Directors**
272 **with a view gaining access to these funds in support of the At-Large Community.**
273

274 **ALAC Response:** The ALAC supports the first part of this recommendation that we be involved with the
275 CCWG Auction Proceeds. In fact, the Vice-Chair of the CCWG Charter Drafting Team was from the ALAC
276 and the ALAC is one of the Chartering Organizations, so we could not avoid being involved. As a
277 Chartering Organization, the ALAC is required contribute Members to the CCWG and will be called upon
278 to ratify any recommendation that arise out of the CCWG.

279
280 The CCWG will be deciding on the methodology and structure associated with disbursing funds, which
281 will only happen after the CCWG completes its work. The CCWG is not the place to request funds for
282 specific projects or activities. One of the issues that will be discussed is whether ICANN and its
283 constituent bodies could ultimately apply for any of the funds. If any At-Large people participate in the
284 CCWG with the explicit intent of planning to later request funding for the At-Large Community, we
285 would have to explicitly declare that and as such would not be able to equitably participate in
286 discussions related to this core issue.

287
288 Once the CCWG completes its deliberations, and presuming the Chartering Organizations largely ratify
289 the outcomes, the Board will then consider the recommendations. It is envisioned that if the Board
290 approves, some sort of organization will be created or contracted with to consider projects and do the
291 actual disbursement.

292
293 The Review Team has been misinformed if it believes that the Board is empowered to enter into any
294 such discussions at this time.

295
296 Moreover, although one can envision all manner of good projects that could be funded, it is not clear
297 that actually funding operational expenses of At-Large are among them, and in fact there is already
298 considerable opposition to doing this, both within At-Large and the rest of ICANN.

299
300

301 **Recommendation 16: Adopt a set of metrics that are consistent for the entire At-Large**
302 **Community to measure the implementation and impact of the EMM and track the continuous**
303 **improvement of the At-Large Community.**

304

305 **ALAC Response:** As noted elsewhere, the ALAC does not support implementation of the EMM. However,
306 the ALAC does support the establishment of metrics to track performance and improvement of the At-
307 Large Community. In fact, we have a Metrics WG (one of the groups to be abolished) that has just that
308 responsibility. It is currently on hold pending the completion of the ALS and RALO Criteria and
309 Expectations group.

310

311 | **3. ~~Comments on~~ Recommendation Made Through Omission**

312 **Maintain the single voting Board member by At-Large.**

313

314 **ALAC Response:** The report presents a number of pro and con arguments for an additional At-Large
315 Director. The arguments against such a move were:

- 316 1. The ALAC has significant - and sufficient - power with one voting seat. “Sufficient is clearly a
317 judgement call and not a rational argument.
- 318 2. The ALAC has more voting power than the GAC, the RSSAC or the SSAC. The Bylaws forbid
319 government representatives from sitting as voting Board members, so the GAC is not even a
320 question. The RSSAC and SSAC have made it clear through their decision not to participate in the
321 Empowered Community that they wish to stay purely advisory. We note that the other ACs have
322 always been in a different position relative to the ALAC in that they have only non-voting Liaisons to
323 the NomCom.
- 324 3. An increase would not sit well with other (competing parts of ICANN). This is intuitively obvious and
325 not a reason to not take action. Those same groups did not want the ALAC or the GAC to participate
326 in the Empowered Community, preserving all the power for themselves.
- 327 4. At-Large has 5 delegates on the NomCom, so does not need a 2nd Director. We note that the GNSO
328 has 2 voting Directors and 7 delegates on the NomCom.

329 **4. Comments on EMM Implementation Guidelines**

330

331 **Implementation # 1: Adopt the Empowered Membership Model (EMM) as proposed to bring**
332 **a greater number of end users directly into ICANN policy making processes, and or engaged**
333 **in At- Large outreach activities (Section 11).**

334 **Implementation # 2: Engage more end users directly in ICANN Working Groups by adopting**
335 **the Empowered Membership Model described in this document (See Section 11).**

336 **Implementation # 3: Adopt the Empowered Membership Model described in this document**
337 **to engage more end users directly in ICANN work. (Section 11).**

338
339 **ALAC Response:** It is unclear what the mechanism is by which users will become informed of the EMM,
340 what it is that will motivate them to begin spending significant time and effort to participate in ICANN
341 policy issues (including learning the vernacular, getting up to speed on the issues in question and
342 expending significant time on a regular basis). The presence of a vote seems to be a critical part of this,
343 since it is that which differentiates the EMM from the individual unaffiliated members that three of the
344 five RALOs have, and the other two are committed to allow. But this vote is only allotted after (and
345 presumably continuing) demonstration of active participation. It is unclear who judges such
346 participation and how this is done – this is an issue that At-Large has been grappling with for years and is
347 not a minor implementation issue. If a possible vote is the critical issue in motivating people, one has to
348 question their overall commitment.

349 **Implementation # 4: In the Empowered Membership Model individual users will be**
350 **encouraged to participate in At-Large. Within this context there should be scope for further**
351 **cooperation with the NCSG (Section 12).**

352
353 **ALAC Response:** What is the connection between participation in At-Large and cooperation with NCSG.
354 Typically new people involved in ICANN want to select their “home” and sadly due to the nature of few
355 NCSG leaders, those who select NCSG often become “poisoned” and have little interest in cooperation
356 with At-Large. That being said, the ALAC is always interested in cooperating with other parts of ICANN
357 and does so regularly with most other groups and is currently planning a cooperative outreach event
358 with NCSG to be held in Copenhagen.

359 **Implementation # 5: Any individual from any region should be allowed to become an “At-**
360 **Large Member” (ALM). The ALM is what the Empowered Membership Model identifies as the**
361 **atomic element of the new At-Large model (Section 11).**

362
363 **ALAC Response:** This is the status quo for three of the five regions and will be the case for all regions,
364 regardless of implementation of the EMM. Some regions do have concerns that they may need to place
365 some restrictions to ensure that users support the principles of At-Large and do not use the At-Large
366 persona to campaign for anti-user issues.

367 **Implementation # 6: Adopt the Empowered Membership Model which changes the function**
368 **of RALOs so that they are primarily an outreach and mentoring mechanism for engaging**
369 **new entrants (Section 11)**

370

371 **ALAC Response:** That is in fact the major focus of RALOs today. Many within At-Large find this
372 problematic in that the RALOs have not explicitly focused on Policy issues. Since RALOs do not currently
373 have a policy focus, their mentoring tends to not be in that area.

375 **Implementation # 7: As part of the Empowered Membership Model, elected RALO**
376 **representatives become ALAC Members who not only deliberate on advice to the Board but**
377 **also serve as mentors to newcomers to At-Large. (Section 11)**

378

379 **ALAC Response:** Workload is already a major issue within At-Large and particularly for RALO leaders and
380 ALAC Members. Although a small number of people put a vast number of hours into At-Large and ICANN
381 matters, asking all such volunteers to do so is problematic. Moreover, if outreach is a prime focus of
382 RALOSs as implied by Implementation 6, these are not the optimal people to place on the ALAC and then
383 debate policy issues.

384 **Implementation # 8: The ALAC Members should have a maximum of (2) terms, each of a 2-**
385 **year duration.(see Section 11).**

386

387 **ALAC Response:** Term limits are reasonable, but it is less clear that two terms is optimal. One RALO
388 currently has a shorter limit, and others may feel that in critical times, the limit should be able to be
389 overridden. It is important to realize that in the entire history of the modern ALAC (after the Interim
390 ALAC appointed by the Board), there have been 65 RALO and NomCom appointed ALAC members and
391 only five of them have served for more than two consecutive terms (and two of those only exceeded the
392 two-term point after the last AGM.

393 **Implementation # 14: The proposed Empowered Membership Model (Section 11) conflates**
394 **many of these roles and consequently frees up travel slots for new voices. For example the 5**
395 **RALOS are now part of the 15 ALAC Member list and 5 Liaison roles are also taken by**
396 **NomCom appointed ALAC Members, leaving 2 for the Council of Elders and up to 10 slots for**
397 **Rapporteurs for CCWGs and regular WGs (to be decided openly and transparently).**

398

399 **ALAC Response:** **The ALAC does not support much of this Implementation Guideline. Specific issues will**
400 **be more fully addressed in section 6 of this document.**

401

402 **5. Methodology**

403

404 **Reliance on Comments**

405 **The Review relies heavily of comments provided during interviews and in surveys, many of them very**

406 negative. There is no doubt that the existence of such comments is both relevant and important, but
407 that does not imply that the “facts” cited are correct.

408 In the first draft of the report there were many comments on the lack of turnover of workers in At-
409 Large. The ALAC provided significant detailed records (largely gleaned from public sources) to
410 demonstrate that this was not the case, and the second draft had fewer such comments in evidence,
411 although it did not alter the basic conclusions. But still such comments were included in this draft and
412 seemingly presumed to be factual. As an example, in section 4.3.4, one finds

413 *“More candidates? I can only think of a handful of people associated with At-Large Leadership*
414 *over the ten plus years I've followed ICANN.” (NCSG Participant)”*

415 There is no doubt that the commenter could only think of a half dozen or so, but the actual statistics
416 give a somewhat different picture. In the last ten years (2007-20016), there have been:

- 417 • 17 people in ALAC Leadership positions
- 418 • 5 ALAC Chairs (2 for short periods due to illness and the transition from the Interim ALAC to
419 current Form)
- 420 • 41 people in RALO Leadership positions
- 421 • 23 RALO Chairs (or equivalent)

422 During this same period, the GAC has had 3 Chairs, ccNSO 3, SSAC 2 and GNSO 6.

423 It is unclear why the ALAC had to devote the volunteer time to refute such comments. Many other
424 comments are equally slanted even if not as easy to disprove analytically.

425 **Lack of connection between Conclusions and Recommendations**

426 Many (but not all) of the conclusions reached in analyzing At-Large are correct. This is not particularly
427 surprising because the ALAC and its leaders have spent significant time understanding what is working
428 and what it not working in At-Large (part of the inward focus for which we are criticized) and we were
429 very open with the Review Team when they started their work. However, as noted in the comments to
430 the Recommendations and Implementations, there is little connection between the problem identified
431 and the solution. No rational is given why the problem will go away. This is particularly true for the core
432 concept of the Recommendations, the Empowered Membership Model (EMM).The problem is that we
433 have great difficulty getting people on the periphery of At-Large to learn about the policy issues and
434 commit significant time to ICANN (often during their working hours), perhaps overcoming significant
435 language problems in the process. ITEMS presumes that with the fancy new name¹, and the ability to
436 vote in occasional elections (for those RALOs that have elections), dedicated users will magically flock to
437 us. This is akin to the movie Field of Dreams – if we build a baseball stadium in the middle of nowhere,

¹ The EMPOWERED Membership Model name is clearly borrowed from the new ICANN Bylaw construct the
Empowered Community (EC). However the Members in the EMM have no powers akin to those of the EC, and
certainly the ALAC EC powers are not being transferred to them. ITEMS was advised that using this name would
only cause confusion or concern in other parts of ICANN, where there was strong belief that LAC should not be part
of the EC, but they decided to keep the name.

438 long-dead baseball players will arrive to play and people will flock there to watch them, not even
439 knowing why they are arriving. But that was fantasy movie and we need more solid logic here. The
440 report does recommend a number of distinct outreach mechanisms with the aim of attracting more new
441 participants. Unfortunately, in virtually all cases, At-Large already uses those mechanisms to the
442 maximum that our funding allows.

443 **Survey has design problems and results interpretation problematic**

444 Parts of the survey were poorly designed and the result interpretation questionable.

445 As an example, one of the questions asked: *In your opinion which of the following statements most*
446 *accurately describes the role played by the At-Large Community within ICANN?* There were a number of
447 options, but respondents could pick only one. Among them:

- 448 • *ALSes act in their own interest, a basically accurate statement. Each ALS is an organization that*
449 *exists largely for purposes other than ICANN and looks at issues from its own perspective. In*
450 *theory, if we can gather enough of these individual positions, together they do indeed represent*
451 *the needs of the global end user.*
- 452 • *ALSes and individuals can engage in ICANN policy processes; a true statement, unless you*
453 *interpret it as they cannot due to the steep learning curve and time commitment involved.*
- 454 • *At-Large allows users to participate on an equal and non-discriminatory fashion. True in theory,*
455 *quite false in practice.*

456 Several of the choices were correct to varying degrees, and several could be the selected answer but for
457 completely different reasons. It is not surprising that answers were all over the place and were subject
458 to varying interpretations by the Review Team.

459 Another question asked how many ALSes were active in ccNSO and GNSO policy processes. The results
460 were 39% and 31% respectively. It is difficult to gauge how many this really is, since we were not told
461 how many ALSes responded to the question. However, if the number is very small, the data is
462 meaningless, and if the number is substantial, the results are not believable – we have accurate
463 numbers of people claiming to be with At-Large are active in GNSO PDPs, and the number is small
464 indeed. And the ccNSO has very limited PDP activity and the At-Large participants are well documents
465 and minimal.

466 As noted above, although we are told that there were 242 surveys completed, all of the rest of the statistics
467 presented are percentages of specific groups, but with no information of the group sizes.

468 In a similar vein, reports such as this typically list the people interviewed and their affiliation. This
469 report is totally silent on this with the exception of several Tweets that are displayed verbatim, and not
470 unlike other Tweets we are familiar with recently, not accurate.

471 **Focus on events at the time of the Review**

472 It is perhaps natural that the Review Team focused on what they saw at the various events they
473 attended, but they did not seem to grasp that the previous two years in ICANN were very atypical, and

474 the focus of much of the organization has been on the IANA Stewardship Transition and ICANN
475 Accountability. At-Large and the ALAC invested VERY heavily in these processes, to the clear detriment
476 of many other activities. The ITEMS team arrived at the tail end of this and seem to believe that what
477 they saw was the norm. In reality much of the “regular” policy work of ICANN has largely been on hold
478 for close to two years, and the work of At-Large along with it. There is virtually no mention in the report
479 of the significant accomplishments of At-Large during these efforts.

480 **6. Non-Recommendation Suggestions**

481 The report include a number of very specific suggestions that do not surface as formal
482 recommendations, but are referenced in the Implementation Guidelines. They warrant comment
483 because in the minds of many within the ALAC and At-Large, they are extremely misguided and
484 demonstrate a lack of understanding of our environment.

485 Conflation of RALO Leaders and ALAC Members: To be written

486 ALM “activity” certification: To be written

487 Rapporteurs: To be written

488 Liaisons: To be written

489 Council of Elders: To be written

490 ALM Meeting funding criteria: To be written

491 **7. Analysis of Prior Review Recommendation**

492 To be written

493 **8. The issue of Volunteer Turnover**

494 To be written