



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

TABLE OF CONTENTS

1) EXECUTIVE SUMMARY	2
2) FINDINGS RELATED TO PUBLIC COMMENT SOLICITATIONS	4
A. SOLICITATIONS PUBLISHED	4
B. SOLICITATIONS TRANSLATED	6
C. PUBLIC COMMENT SOLICITATION LENGTH	7
3) FINDINGS RELATED TO COMMENTS	12
A. MOST POPULAR SOLICITATION TOPICS (TOTAL POSTS RECEIVED)	12
B. LEAST POPULAR SOLICITATION TOPICS (TOTAL COMMENTS = 0)	13
C. PUBLIC COMMENT PARTICIPATION LEVELS.....	14
4) OVERALL FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS.....	18
A. PARTICIPATION LEVELS	18
B. COMMENT PERIOD LENGTH	18
C. LANGUAGE TRANSLATIONS.....	19
D. UPCOMING TOPICS.....	19
E. PUBLIC COMMENT PROCESS CHANGES INTRODUCED IN 2016	19
APPENDIX A: BACKGROUND AND OVERVIEW	21
APPENDIX B: PUBLIC COMMENT SOLICITATIONS RECEIVING ZERO COMMENTS (2010-2016)	24



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

1) Executive Summary

This report represents the fourth in a succession of Public Comment analyses that began formally in May 2013 studying the period 2010-2012. For those readers interested in the history of Public Comment analyses, **Appendix A-Background and Overview** explains the origin of these analyses, including links to previous reports, and their relationships to Accountability Transparency Review Team (ATRT) recommendations and implementations.

Although the original purpose of studying ICANN Public Comment solicitations was to understand the impacts of specific improvements implemented (e.g., ATRT1, ATRT2) at various points in time, this iteration represents a more generic assessment of overall trends and patterns occurring throughout the seven-year period (2010-2016) and does not focus on specific improvement initiatives previously vetted.

Year Summary: 2016

The following table provides a quick summary of the key data fields captured for the most recent calendar year (2016). In later report sections, this data will be compared to and contrasted with previous years in various tables, charts, and graphs.

Table 1.1

2016/Department	Solicitations	Avg Period Length	Total Comments	Translations
Policy	6	58	30	2
Strategic	1	41	7	0
GDD	22	54	326	2
Legal	6	36	57	2
Finance	2	53	17	2
Technical	6	56	17	0
Engagement	3	38	40	1
Grand Total	46	51	494	9

Key Summary Findings and Conclusions

Following are key observations that are more fully elaborated in Section 4: Overall Findings, Conclusions, and Recommendations.

- The total number of Public Comment solicitations has declined approximately 8% (CAGR¹) from 2010 (77) to 2016 (46) and, in the last two years has averaged ~4/month (12/quarter). It is not

¹ CAGR refers to "Compound Annual Growth Rate."



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

clear from the data itself why this decline in activity has occurred nor is there any reason to conclude that this trend will continue into 2017 and beyond (see Section 2-A, Chart 2.1).

- There has been a shift in recent years as to which ICANN Departments publish the highest quantity of Public Comment topics. The Policy Development Support Department (Policy) dominated that position from 2010-2013; however, the Global Domains Division (GDD) has become the leading department during the past three years (see Chart 2.3).
- The percentage of solicitations translated into languages other than English had fallen from a high of nearly 50% in 2010 to just under 10% in 2013; however, in the most recent two years, there has been a marked turnaround ascending to ~20% (see Section 2-B).
- The length of time (days) Public Comment solicitations remain open for comment increased from 42-44 days in 2010-2011 to 50-52 days throughout the past five years (see Section 2-C). This step-increase (~8 days) can be attributed to (a) ATRT process improvements and (b) ICANN Community feedback. Over time, several community groups have noted that they would welcome longer comment periods because they have lengthy internal processes whereby they collect input from their members and attempt to reach consensus concerning policy positions before submitting one consolidated view to the Public Comment forum.
- During the past two years (2015-2016), 91% of all Public Comment solicitations have been open for at least 40 days – a minimum Staff default time-period established in January 2015. For information on those specific solicitation topics (9%) which were open for less than 40 days, see Section 2-C, Chart 2.7.
- In terms of participation levels, during the seven-year period from 2010-2016, the median number of comments per solicitation has been relatively stable between 5-7 (see Section 3-C, Chart 3.3). It should be underscored that, in many instances, SO/ACs submit one consolidated response for their entire organizations; therefore, the relatively low number of comments received is not always a reliable barometer of the total number of opinions represented.

A Note About Data Collection

The data collection process involves harvesting information from each of the Public Comment pages archived on ICANN.org and building an Excel workbook for subsequent analysis. Once the data is available in spreadsheet form, various statistical calculations and other summarizations are prepared along with graphs/charts highlighting trends and patterns. Sections 2 and 3 of this report present various findings that may be useful as input to those who will continue working toward improving the Public Comment capability within ICANN. Section 4 summarizes findings that can be gleaned from the various data analyses.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

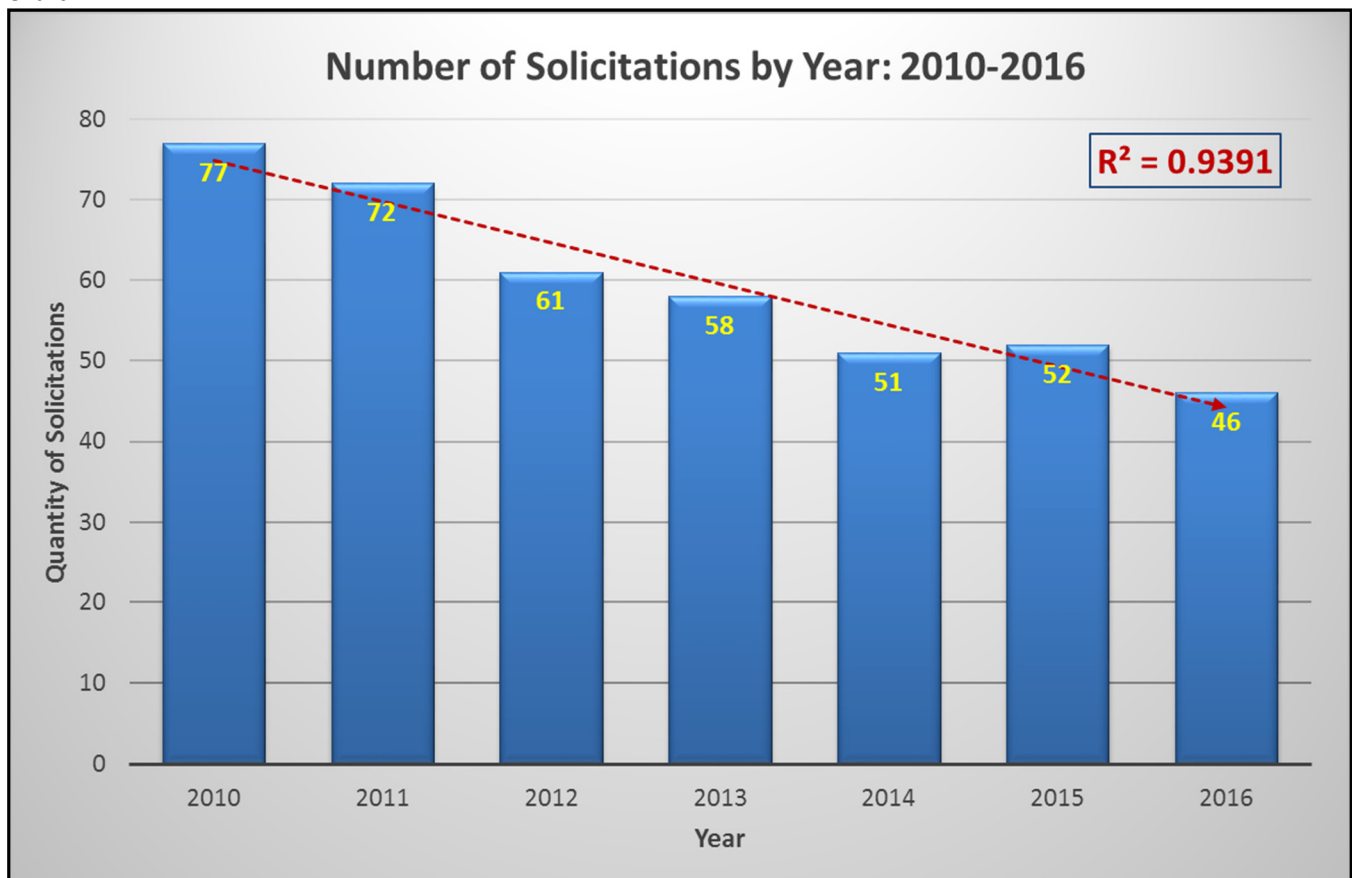
2) Findings Related to Public Comment Solicitations

There were **417** Public Comment solicitations (Jan 2010-Dec 2016) included as part of this data analysis. This section summarizes those findings related to the solicitations themselves; whereas, Section 3 will report statistics related to the comments submitted.

A. Solicitations Published

Chart 2.1 below shows the number of solicitations by year (using Close-Date) during the seven-year horizon. Although there is a downward trajectory ($\sim -8.2\%$ CAGR²) in the number of solicitations per year, there is no evidence to suggest that it is symptomatic of anything other than the normal ebb and flow of work confronting ICANN. On a quarterly basis, the number of solicitations has declined from a high of 19 in 2010 to just under 12 in 2016.

Chart 2.1



² CAGR = Compound Annual Growth Rate which, in this instance, is negative.

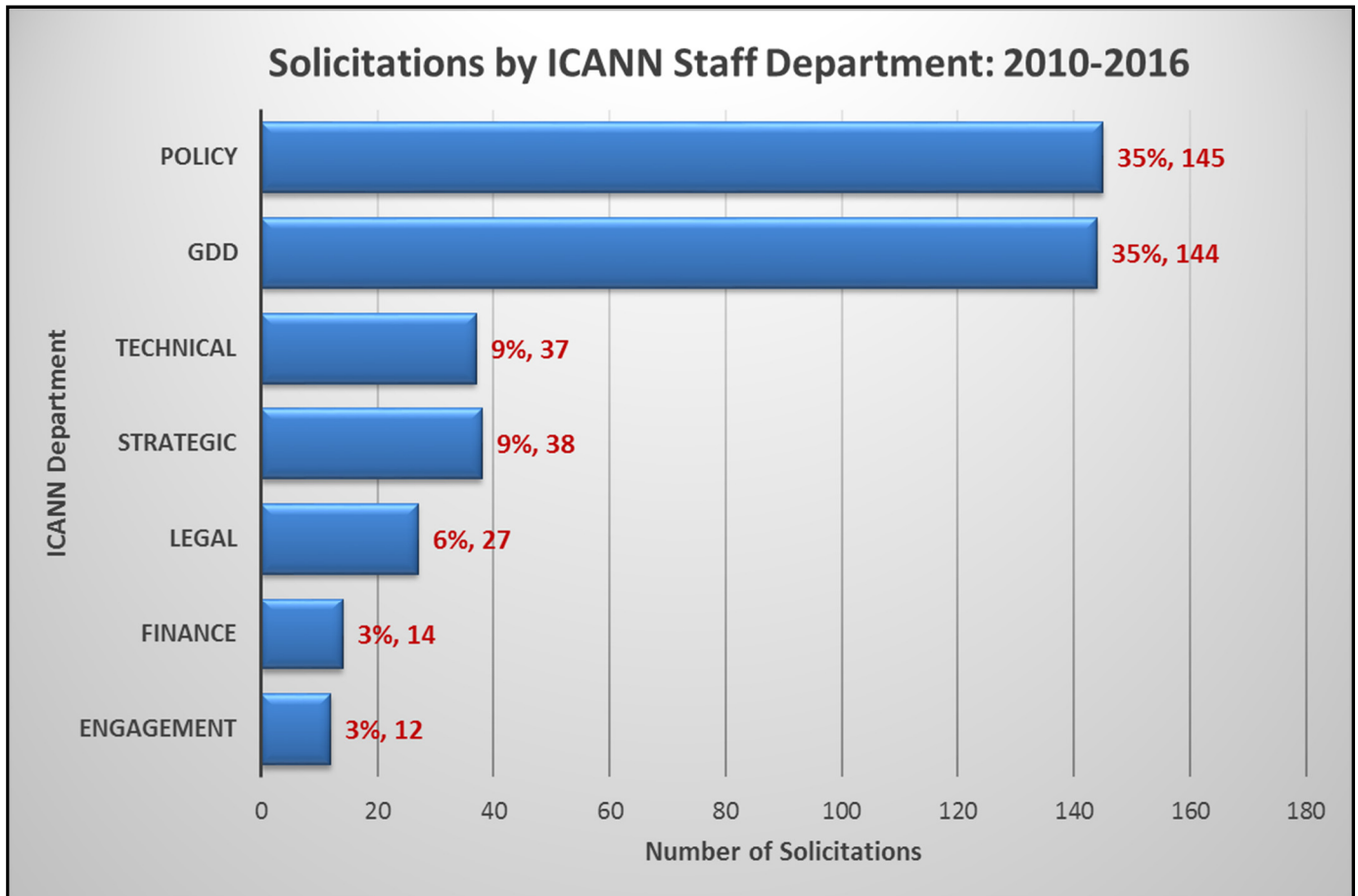


PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

One way to help understand the decline in overall volumes is to examine the number of solicitations by ICANN Staff Department. The next Chart 2.2 shows that the two largest overall contributing departments to ICANN Public Comment solicitations are Policy and GDD which, together, make up 70% of the total volume of solicitations from 2010-2016.

Chart 2.2



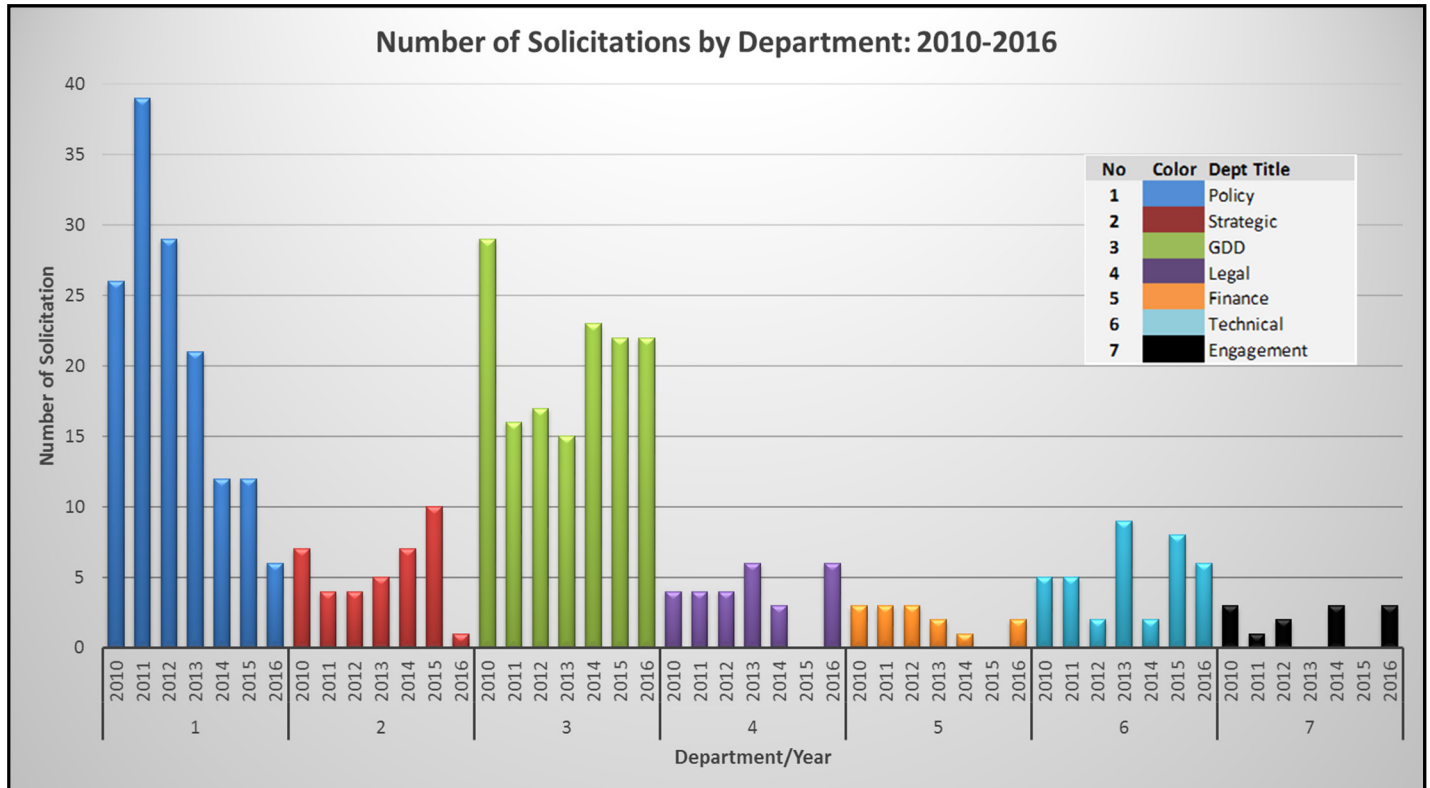
In Chart 2.3, looking more closely at Policy and GDD, it can be seen that GDD experienced a peak in 2010 followed by a drop to 15-17/year in 2011-2013. GDD's volumes then increased to 22-23 in years 2014-2016. Policy's peak occurred in 2011 and has witnessed steadily decreasing volumes in nearly all succeeding years. Policy's volume in 2016 (6) is 85% lower than the number of solicitations closed in 2011 (39). All other departments' volumes have relatively stable except for a noticeable drop in solicitations posted by the Strategic team in 2016.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Chart 2.3



Although significant variations occur within departments, the overall number of topics closed each month has been relatively stable over the study period and, barring any fundamental shifts in the underlying dynamics, would be predicted to continue in the approximate range of 12-15 per quarter (or 4-5 per month) on average.

B. Solicitations Translated

One of the data elements captured for each solicitation was whether or not translation services were utilized (see Chart 2.4). For this purpose, a solicitation was scored “Yes” for translations if there was evidence that any portion of the materials presented was made available in a language other than English³. There was no minimum requirement for number of languages selected or extent/type of material translated. Even if just one reference document was available in another language (e.g., French, Spanish), it was counted as having utilized translation services.

³ This data references only ICANN Public Comment solicitations - not Announcements, which are often translated.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Chart 2.4

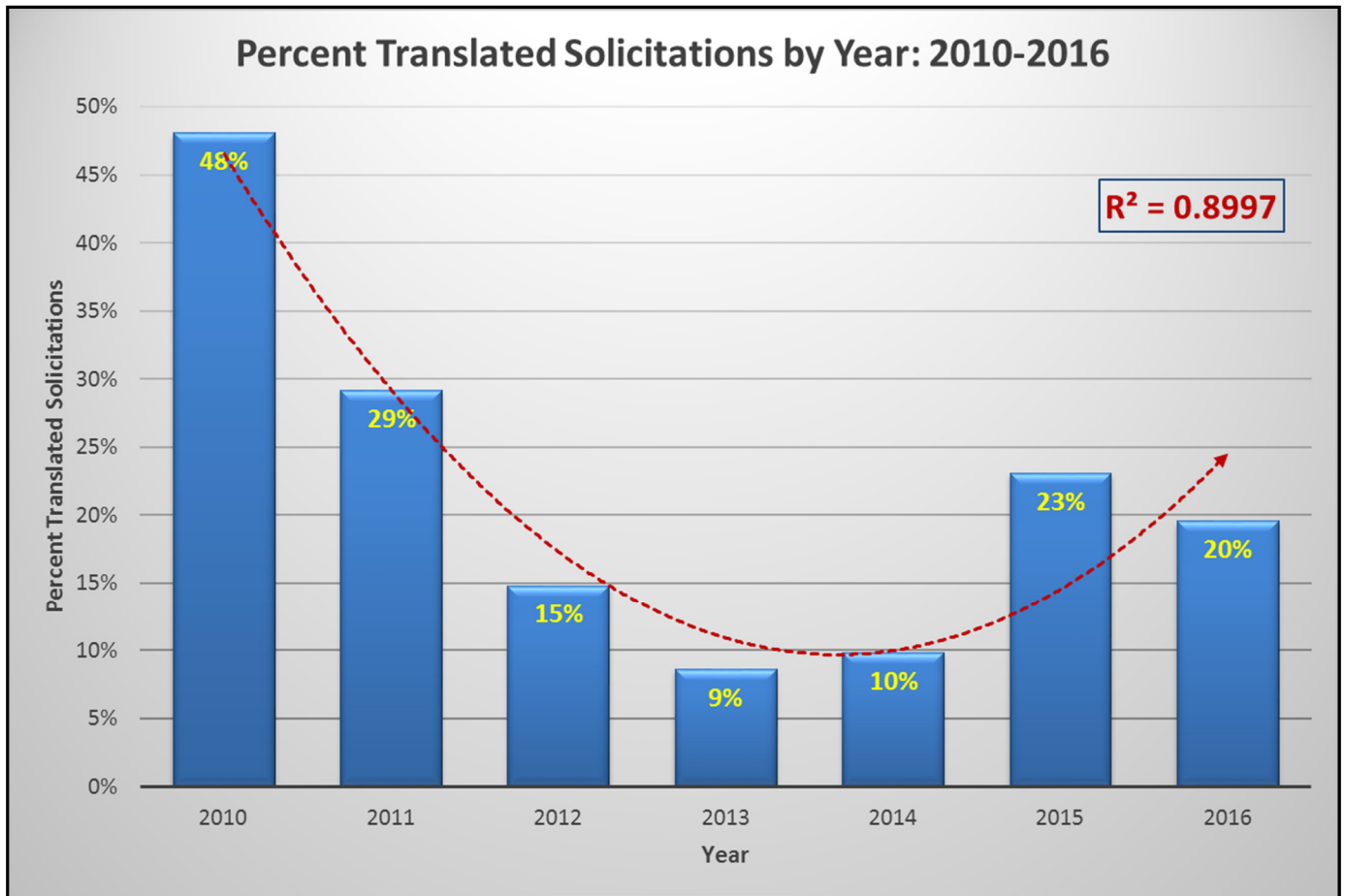


Chart 2.4 above shows that, from 2010-2013, there was a steady decline in the use of translations for Public Comment solicitations; however, that trend appears to be reversing as indicated by the relatively noticeable increase during 2014-2016. As will be explored further in Section 4-Findings and Conclusions, initiatives were undertaken in early 2015 by the Policy Department, working with the Language Services team, to increase the number of translated solicitations.

C. Public Comment Solicitation Length

Based upon the published Open and Close Dates (extended dates were always used where applicable), it was possible to determine the average (mean) length of time that Public Comment solicitations remained open for community participation.

The following Chart 2.5 illustrates that the average length for Public Comment solicitations was 43 calendar days in 2010-2011, but has averaged 51 days from 2012-2016. The overall comment period length has step-increased by 8 days on average. This result can be traced to a combination of: (1) ATRT1

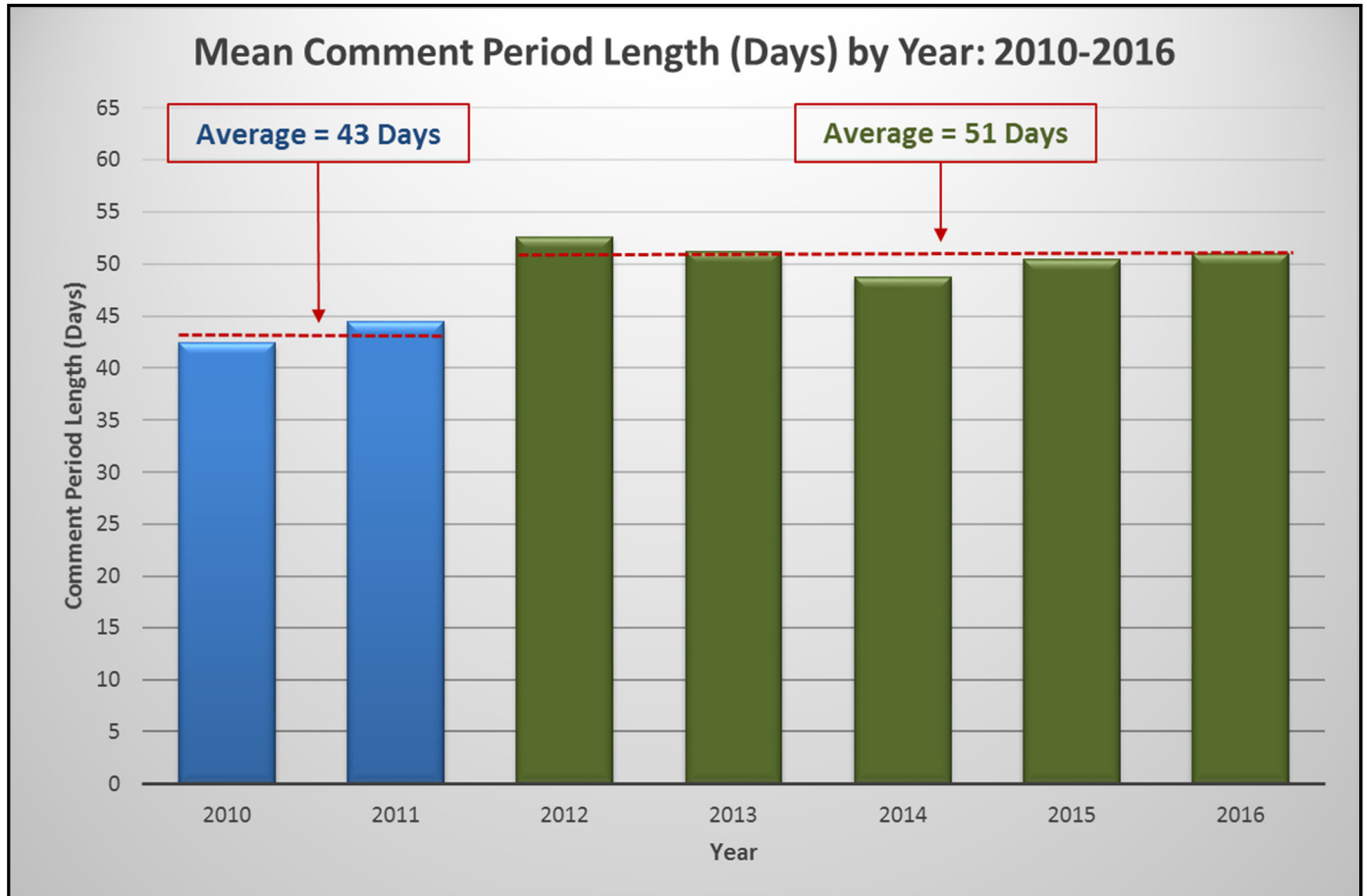


PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

improvements (2012-2014) and (2) changes to Staff guidelines (ATRT2) in direct response to ICANN Community requests for increased time to provide feedback.

Chart 2.5



In concert with the suspension of Reply Cycles effective January 2015, the target minimum default period for Public Comment solicitations was established at 40 days; however, the mean length has remained in the range of 50-52 days.

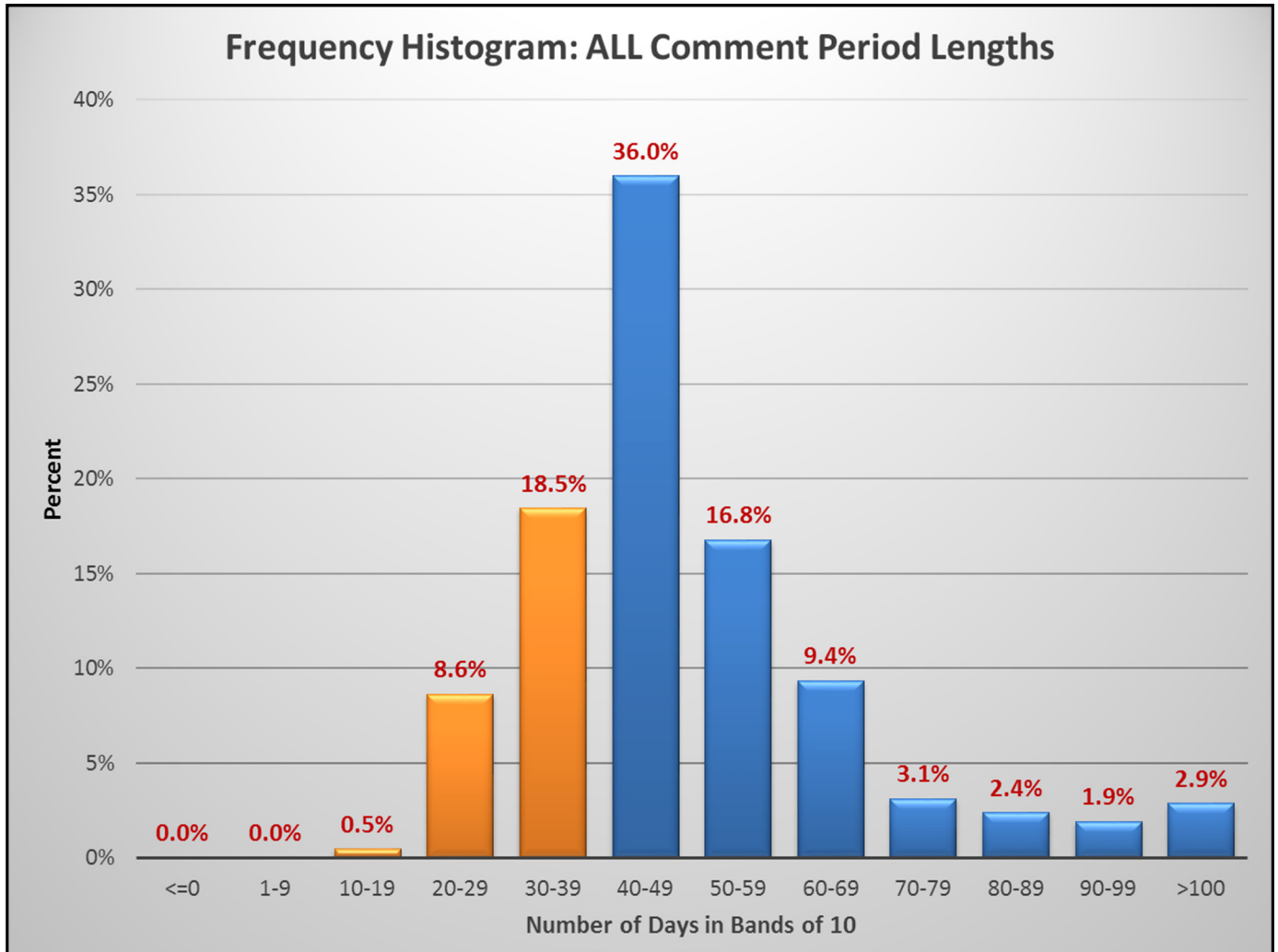
The next chart (2.6) is a frequency histogram showing the complete history (2010-2016) of comment period lengths where the vertical axis represents percentage and the horizontal axis shows the number of days in groups of 10. The tallest bar, then, indicates that 36% of all solicitations (150 of 417) were open between 40-49 days.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Chart 2.6



Over the course of the seven-year horizon, the above chart shows that .5% (2) of all solicitations were open for 10-19 days, 8.6% (36) for 20-29 days, and another 18.5% (77) for 30-39 days. Adding the three orange-shaded bars together, 27.6% of all topics were open for less than 40 days, which, as of January 2015, became the targeted minimum Staff standard.

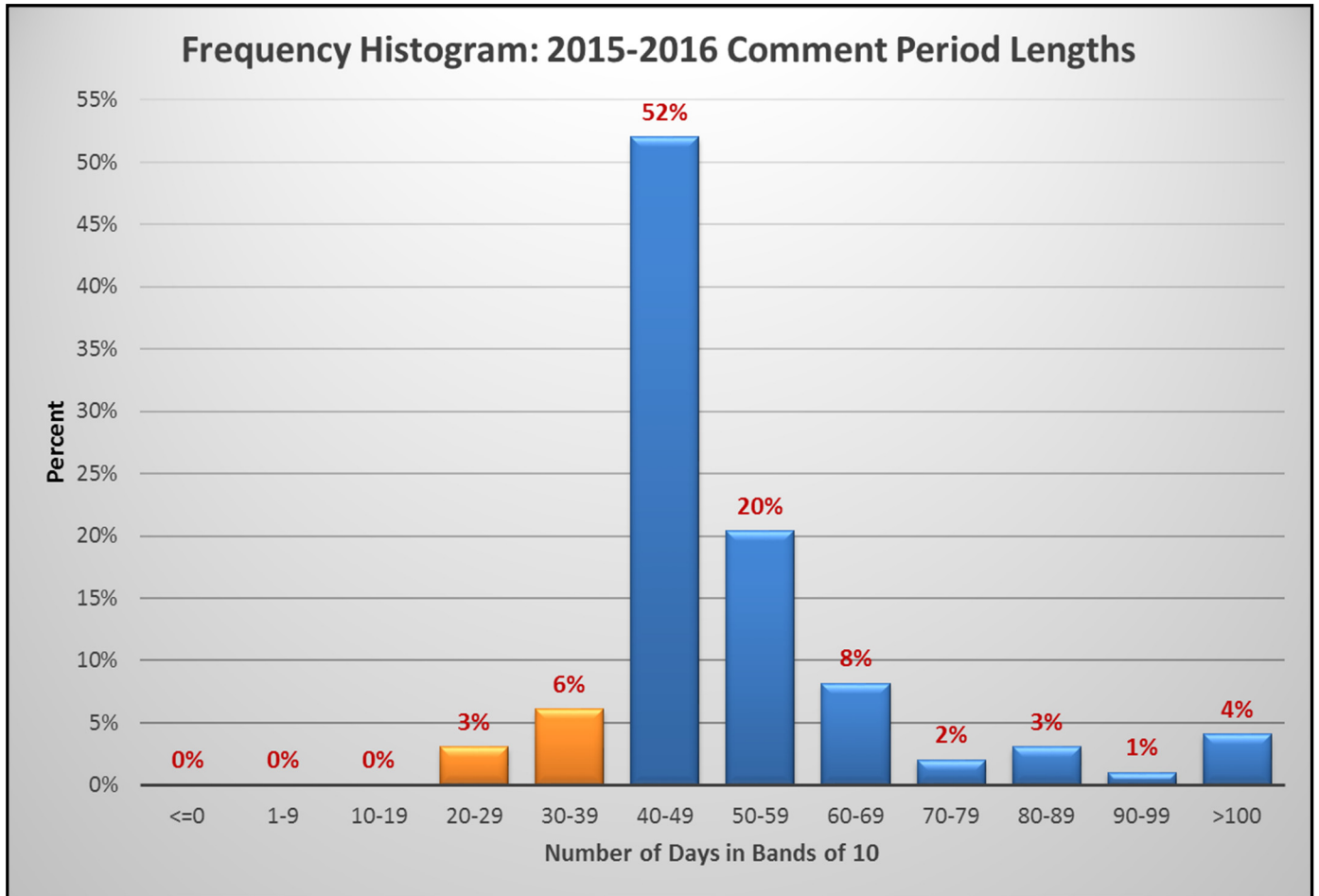
To examine the most recent experience of ICANN Staff in adhering to the minimum guidelines for comment period length, changed effective January 2015, Chart 2.7 (below) displays the last two years (2015-2016) of Public Comment solicitations (Total=98) in the form of a frequency histogram using the same axis structure as the previous diagram.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Chart 2.7



The above histogram confirms that 91% of topics in those two years were open for 40 days or longer (blue-shaded bars), thus satisfying the minimum target requirement. On the other hand, 3% of those solicitations (3) were open for 20-29 days while 6% (6) were open for 30-39 days – both below the standard period length.

Table 2.1 below is a listing of the 9 Public Comment topics that were open for less than 40 days in 2015-2016 sorted chronologically by Year/Quarter. Each row also displays the Open and Close dates as well as the total number of days during which ICANN Community comments were accepted as having met the published timeframe.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Table 2.1

Public Comment Title	Year	Qtr	Mo	Open	Close	Days
2nd Draft Proposal of the Cross Community Working Group to Develop an IANA Stewardship Transition Proposal on Naming Related Functions	2015	2	5	22-Apr-15	20-May-15	29
CCWG-Accountability - Draft Proposal on Work Stream 1 Recommendations	2015	4	12	30-Nov-15	21-Dec-15	22
Draft New ICANN Bylaws	2016	2	5	21-Apr-16	21-May-16	31
Draft Root Zone Evolution Review Committee (RZERC) Charter	2016	3	7	10-Jun-16	10-Jul-16	31
Draft PTI Articles of Incorporation	2016	3	7	1-Jul-16	31-Jul-16	31
PTI Governance Documents	2016	3	8	8-Jul-16	7-Aug-16	31
Draft PTI Bylaws	2016	3	8	12-Jul-16	11-Aug-16	31
IANA Naming Function Agreement	2016	3	9	10-Aug-16	9-Sep-16	31
Middle East and Adjoining Countries 2016-2019 Strategy	2016	4	11	28-Oct-16	17-Nov-16	21



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

3) Findings Related to Comments

This section summarizes findings that relate to ICANN Community comments⁴ rather than the formal solicitations themselves.

A. Most Popular Solicitation Topics (Total Posts Received)

The top eleven (due to a tie for 10th) most popular⁵ Public Comment topics during the years 2010-2016 are shown in Table 3.1 below, sorted in descending order by total number of comments:

Table 3.1

Public Comment Title	Close-Date	Comments
Phased Allocation Program in .JOBS	15-Jul-10	316
New gTLD Program – Draft Expressions of Interest/Pre-Registrations Model	27-Jan-10	277
"Closed Generic" gTLD Applications	7-Mar-13	252
Proposal for Renewal of the .NET Registry Agreement	10-May-11	186
Proposed Final New gTLD Applicant Guidebook	15-Jan-11	177
New gTLD Program - Draft Applicant Guidebook, Version 4 and Explanatory Memoranda	21-Jul-10	164
New gTLD Board Committee Consideration of GAC Safeguard Advice	14-May-13	129
New gTLD Applicant Guidebook – April 2011 Discussion Draft	15-May-11	107
Cross Community Working Group on Enhancing ICANN Accountability 2nd Draft Report (Work Stream 1)	12-Sep-15	101
CCWG-Accountability - Draft Proposal on Work Stream 1 Recommendations	21-Dec-15	99
Public Comment on Proposed Amendment to .COM Registry Agreement	12-Aug-16	99

It appears that 70% of the most popular Public Comment topics were related to the New gTLD program in one way or another.

⁴ As noted in Section 1-Background & Overview, a recommendation of ATRT1 was implemented during the period from Q2/2012 through Q4/2014, which bifurcated each Public Comment solicitation into a Comment period and Reply cycle. Based upon the results of a thorough Staff analysis, that process step was eliminated effective January 2015. For this report, the term “Comments” returns to its pre-ATRT meaning; however, for the periods when “Replies” were submitted, those corrected values have been included so as not to misrepresent the total community response levels at the time.

⁵ Two solicitations dealing with the .XXX domain (May & September 2010) were eliminated from this study as significant outliers having received over 13,000 and 700 submissions respectively. In addition, a solicitation dealing with “GNSO Privacy & Proxy Services Accreditation Issues” (July 2015) received over 11,000 comments and was similarly removed.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

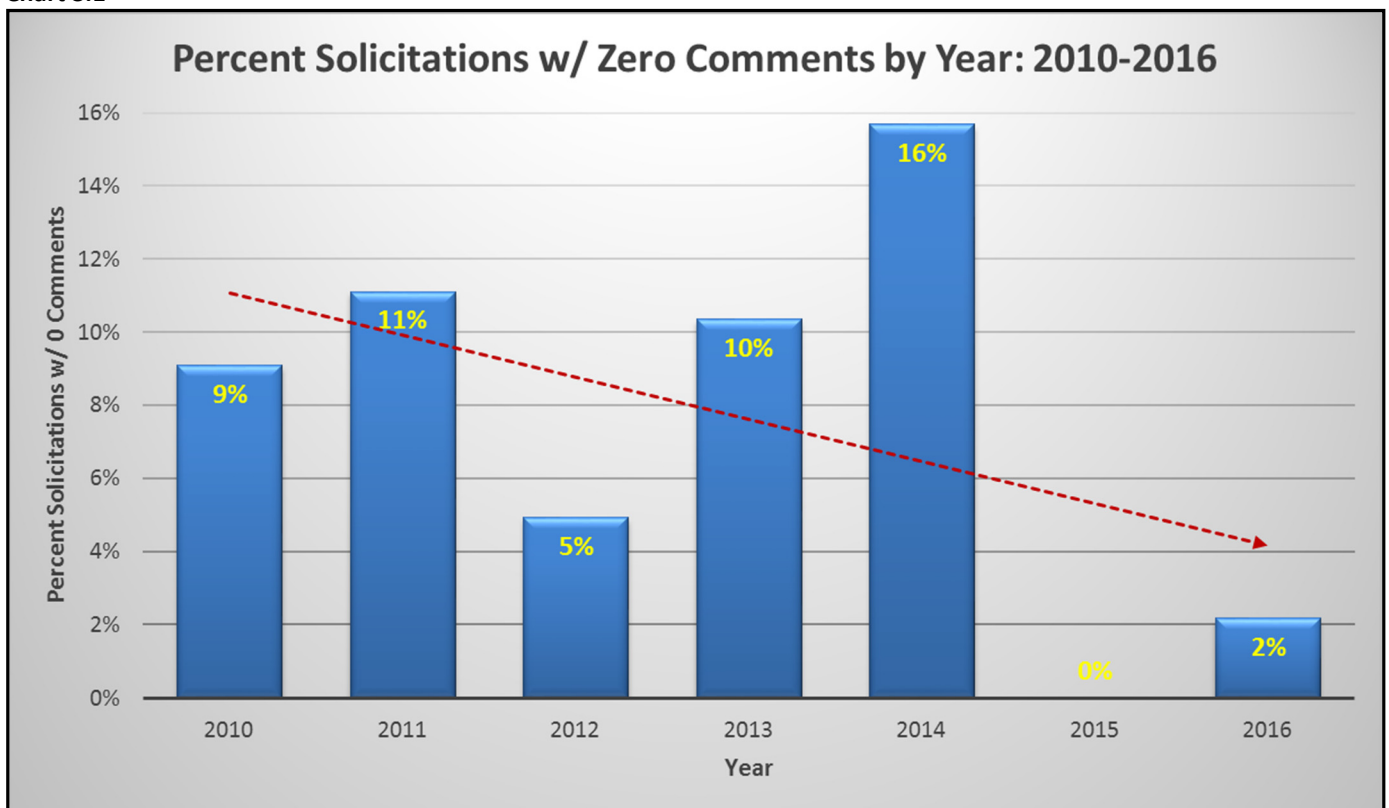
B. Least Popular Solicitation Topics (Total Comments = 0)

At the opposite end of the spectrum (see Table 3.2 to the right), there were 33 Public Comment topics (see Table 3.2, column 3) for which there were no comments submitted (8% of the study sample).

This information is also depicted graphically below in Chart 3.1.

Year	Total Forums	Zero Comments	Percent
2010	77	7	9%
2011	72	8	11%
2012	61	3	5%
2013	58	6	10%
2014	51	8	16%
2015	52	0	0%
2016	46	1	2%
Totals...	417	33	8%

Chart 3.1



The percentage of solicitations experiencing zero comments from the ICANN Community has decreased markedly since 2010-2014. In 2015, every forum received comments and, in 2016, only 2% had no comments submitted.

Noting that the intended purpose of ICANN Public Comment is to solicit feedback, guidance, and input from the volunteer community, it may be productive to study these 33 cases (see Appendix B) in some depth to determine if anything can be learned as to why no comments were received. For example, a



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

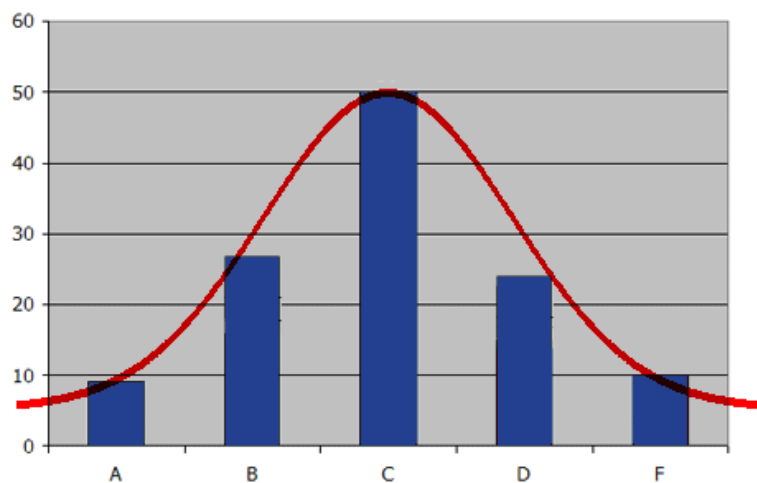
cursor review shows that several of these zero-feedback topics were reports about changes or amendments to existing procedures, e.g., GNSO Operating Procedures, Stakeholder Group or Constituency Charters, or other organizational bylaws. Perhaps there is a more appropriate vehicle for publishing such information than continued use of the Public Comment facility.

C. Public Comment Participation Levels

In order to compute a statistically representative number of responses that reflects the Public Comment experience from 2010-2016, it is important to recognize that several topics generated abnormally high comment levels (see Top Ten List in Table 3.1 above). If one were to calculate the simple average (mean) of all comments received (5,131) across all solicitations over the seven-year horizon (417), it would equal **12** ($5131/417=12.3$); however, that figure is misleading because it is heavily influenced by several unusually large volumes.

The most appropriate time to use a mean or average is when a set of values approaches a “normal” distribution or “bell curve” (see illustration to the right).

Chart 3.2 (below) is a frequency histogram which shows, in increments of 20, the percentage of Solicitations (blue) and Comments (red) within each band. For example, the 2nd grouping of bars signifies that 77% of the solicitations (322 out of 417) received 1-20 comments, but that grouping accounted for only 35% of the total comments submitted (2019 out of 5808). Similarly, at the upper tail, 2% of the solicitations (9 out of 417) were responsible for just under 30% of the total comments received from 2010-2016!



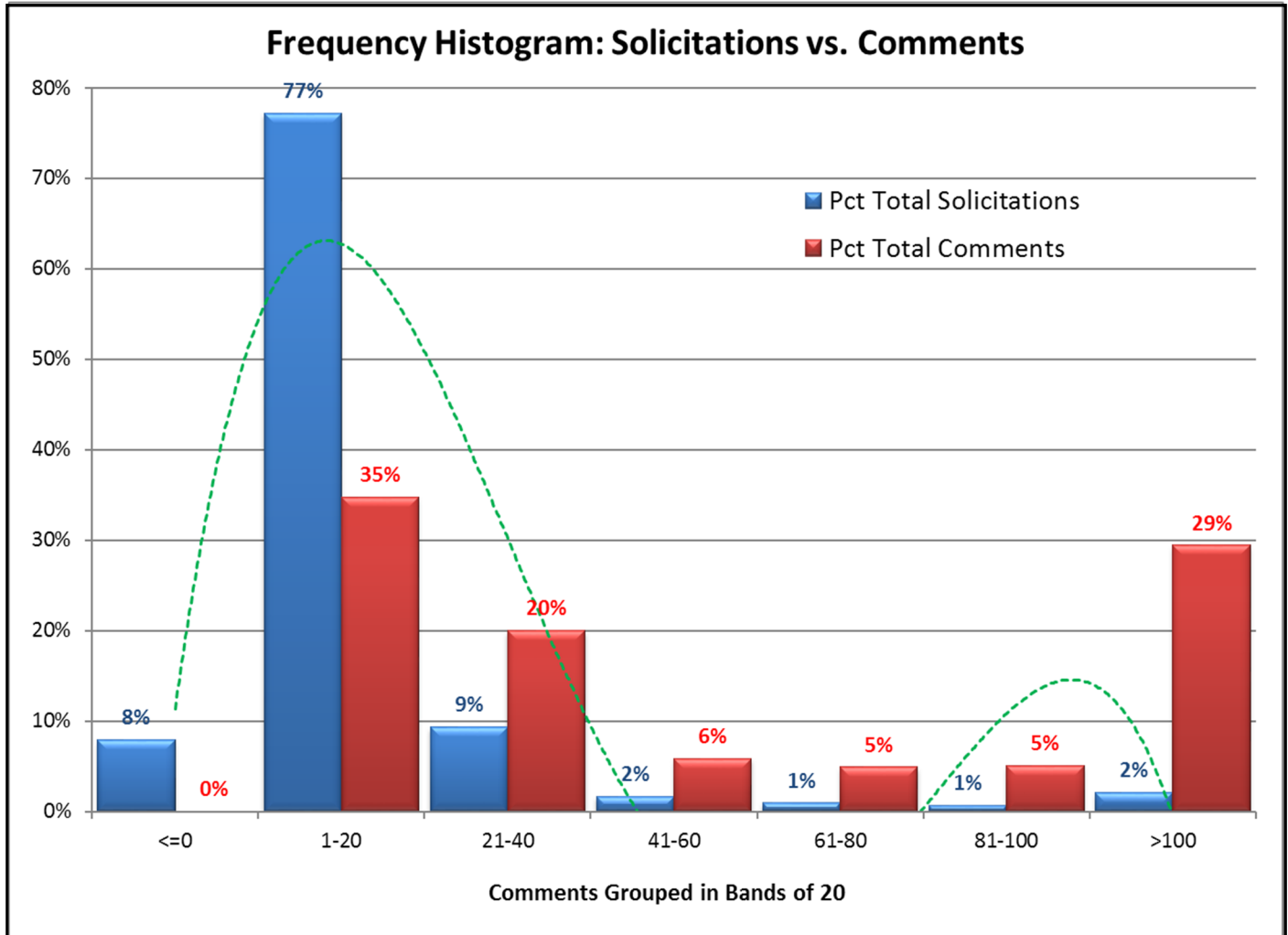
Comparing the heavily skewed and lopsided shape of Chart 3.2 to the “normal” distribution above, it becomes clear that a small number of outlier values at one extreme would significantly overstate any representation as to the typical number of comments experienced overall.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Chart 3.2



Heavily skewed distribution in which 77% of the solicitations (with 1-20 comments) account for only 35% of the total comments received; whereas, at the upper end, 2% of the solicitations (>100 comments) represent just under 30% of the total comments! Note that 8% of all solicitations had zero comments submitted.

Recognizing that simple averages (means) are inappropriate for such a skewed distribution, the preferred measure of central tendency to apply is the median, that is, the mid-point where 50% of the results occur above and below the statistic.

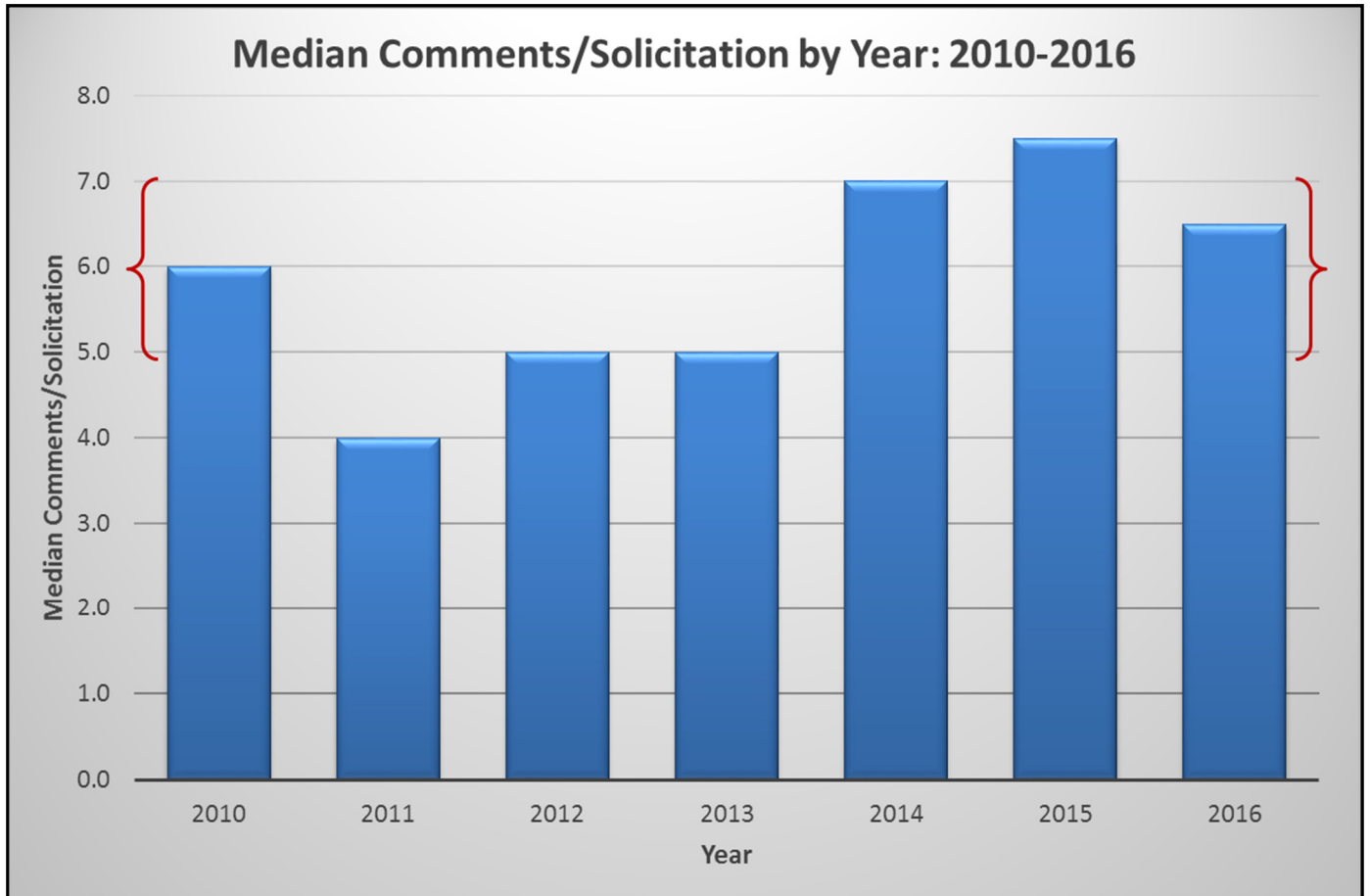
Having explained the mathematical distortion that would result in using means (or averages) for comment volumes, Chart 3.3 shows the median number of comments by year over the study period. The graphic illustrates that, during the period from 2010 through 2016, the median number of comments per solicitation has been relatively stable between 5-7 in five of the seven years. In 2011, the value dropped to 4 and, in 2015, it was slightly above 7.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Chart 3.3



Plotting annual medians of community comments/solicitation shows a relatively stable experience over the 7-year period. The median number of comments/solicitation tends to hover in the 5-7 level except for 2011 and 2015, which were only slightly below/above that range respectively.

While examining the overall participation experience, the next graphic (Chart 3.4) illustrates that, overall, 27% of all solicitations from 2010-2016 received less than or equal to 2 comments and, although not displayed in this chart, 8% (or 33 solicitations) experienced zero submissions (see Table 3.2 and Chart 3.1 above).

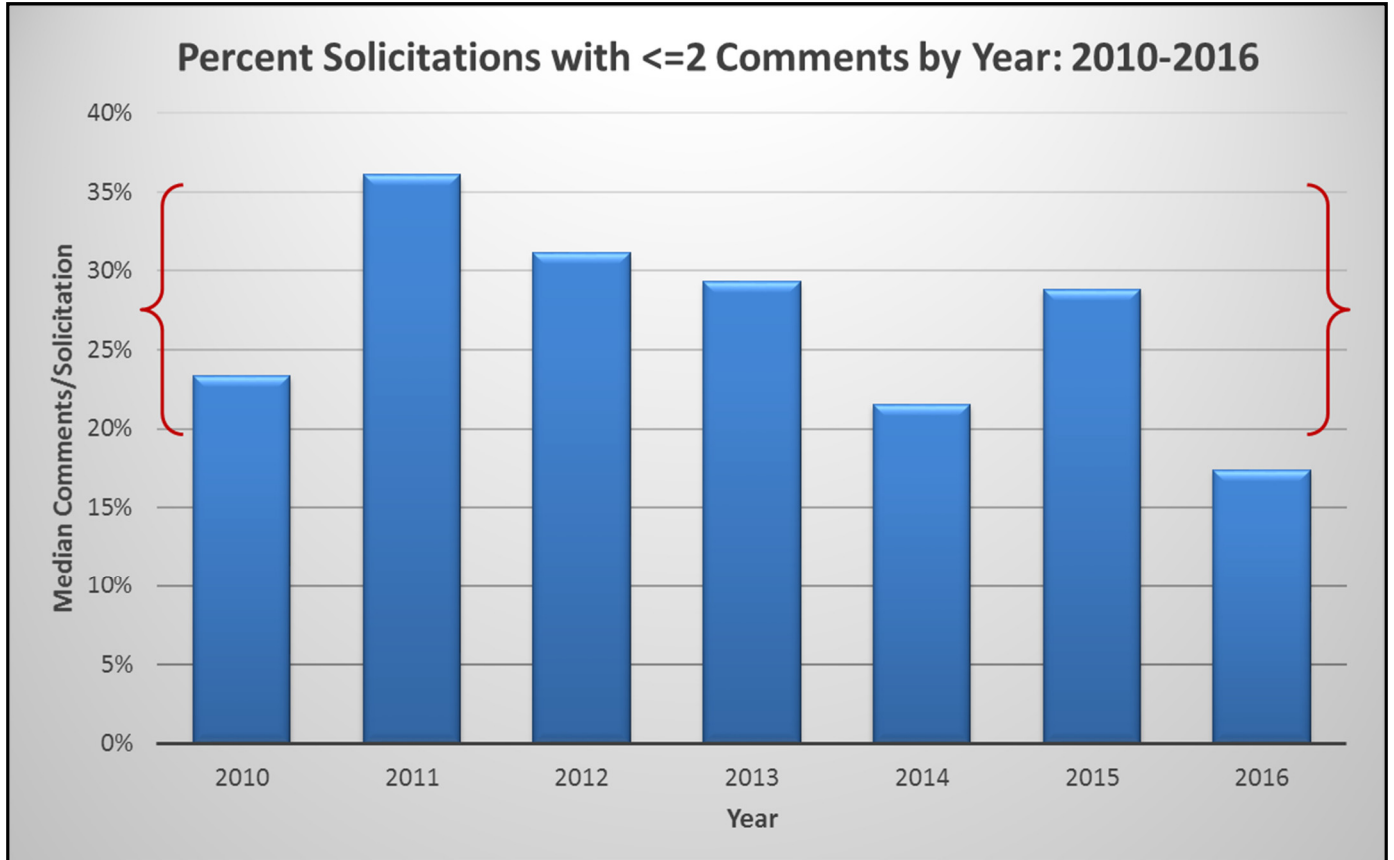
There has been no fundamental change in this data before or after the two ATRT implementations nor did it change after the suspension of Reply Cycles effective January 2015 (see Appendix A for further explanation). It is evident, however, that beginning with 2016, the number of solicitations receiving 0-2 comments has decreased noticeably. It would require a deeper analysis into solicitations themselves – outside the scope of this report - to determine whether their content tends to be characteristic of topics for which community members are more or less likely to provide feedback.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Chart 3.4



Over the 7-year horizon, a little more than 1 in 4 (27%) Public Comment solicitations (114 out of 417) accumulated 0, 1, or 2 community comments. In six out of the 7 years (86%), the percentage of solicitations receiving <=2 comments ranged between 20% and 35%.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

4) Overall Findings, Conclusions, and Recommendations

The following sections summarize findings that can be deduced from this data analysis as well as statements indicating where further research is needed.

A. Participation Levels

The median number of total comments submitted per solicitation has been in the range of 5-7 throughout the seven-year data horizon. As noted in Section 3-C, there were two years, 2011 (4) and 2015 (7.5), when that value dipped slightly below or above that range. There is no supporting quantitative evidence that community participation levels have been materially affected by any of the changes introduced as a result of ATRT1 or ATRT2 enhancements or, for that matter, any other changes introduced to Public Comment processes or protocols.

In evaluating the median number of comments, it is important to recognize that, in many cases, one response may represent the collective feedback of an entire organization (potentially hundreds of members) rather than a single individual. Several SO/ACs have explained to ICANN Staff that they have processes through which they develop and distribute one or more policy position drafts for internal review and consensus (or voting) before they are formally submitted to the ICANN Public Comment process.

Noting that the intended purpose of the ICANN Public Comment process is to solicit feedback, guidance, and input from the volunteer community, it may be productive to study the 33 cases (see Appendix B) that received zero comments. It may be that, for certain classes of topics (e.g., procedural changes, charter revisions, organization bylaws), there may be more appropriate methods for dissemination of the information than continued use of the Public Comment facility.

B. Comment Period Length

The analysis has determined that the overall length of solicitations has increased by approximately 8 days (see Section 2-C, Chart 2.5) attributable, at least in part, to the addition of a Reply Cycle averaging 20 days while having only shortened the original average comment period (43 to 31 days) by 12 (20-12=8). Coincident with the suspension of Reply Cycles in January 2015, the target for each comment period was established at a minimum of 40 days; however, the actual experience in 2015-2016 has been pretty steadily within the range of 50-52 days. There is no evidence, based upon the data analyzed from 2010-2016, that lengthening the entire period by 8 (from 43 to 51) days has resulted in any measurable change to the response or participation rate.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

C. Language Translations

As reported in Section 2-B (see Chart 2.4), there has been a noticeable increase during 2014-2016 in the percentage of Public Comment solicitations that have been translated into languages other than English. That significant uptick follows a period of steady decline from 2010-2013.

Beginning with 2015, the Policy Department, working with the Language Services team, has undertaken to materially increase the number of translated solicitations. The success of this effort has been attributed, in part, to streamlining internal workflows which facilitates more translated content thus providing relevant, multilingual solicitations for an increasingly global community of participants.

As further discussed in that section, a solicitation was counted as having been translated if any portion of the published material appeared in another language (even if only one other). For the sake of completeness, it should be noted that there are six distinct places where translation services might be effectively employed:

- 1) Announcement page
- 2) Public Comment Open page
- 3) Documents attached to a solicitation (e.g., PDFs)
- 4) Comments submitted to the email forum
- 5) Staff Summary Reports
- 6) Issues Tracking Checklists

A further analysis should be undertaken to determine the drivers of the recent rise in the use of translation services for Public Comment solicitations. In addition, it may be productive to consider whether such services should be provided for each of the six areas mentioned above.

If a decision is taken to change the way that translations are implemented, it may be useful to similarly alter the methodology applied for tracking and reporting purposes including adjusting the historical data (back to 2010) so that trends can be meaningfully compared.

D. Upcoming Topics

No data has been available for analysis that would help assess the extent to which forecasting and publishing “Upcoming Topics” has been beneficial to community members.

To evaluate the value and benefit of this particular enhancement would require additional research, possibly incorporating a survey instrument or focus group.

E. Public Comment Process Changes Introduced in 2016

In February 2016, the Policy Department launched a Public Comment portal to process all solicitation requests. The portal streamlines the Staff process for submitting requests to open and close Public



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Comment proceedings as well as to request extensions and post Staff Summary Reports. It also centralizes the location of the various templates and the Staff Guidelines for quick and easy reference. The portal is accessible from the weCANN homepage and in Samanage. Two Staff members manage the portal and collaborate with the Web Content Operations team to ensure timely approvals of all requests.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Appendix A: Background and Overview

The first edition of this report (May 2013) was produced to analyze the effects of changes to ICANN Public Comment solicitations recommended by the first Accountability and Transparency Review Team (ATRT1 Phase). It was refreshed (January 2015) as a result of additional recommendations emanating from the second ATRT deliberations (ATRT2 Phase) as well as improvements identified by Staff from the original data analysis. The sections below represent a summary of each of these major phases as well as the principal outcomes or findings that resulted.

ATRT1 Phase (Q2/2012-Q4/2014)

As an outcome of the 2011 ATRT1 Recommendations, a series of Public Comment enhancements were designed and implemented to address: prioritization, stratification, comment/reply cycles, timelines, and upcoming topics. Following is a list of the four specific ATRT1 recommendations and the phased implementation that culminated on 1 January 2012:

- Rec #15:** Incorporate Prioritization and Stratification based on community input and consultation with Staff.
- Rec #16:** Create distinct Comment and Reply cycles that allow community respondents to address and rebut arguments raised.
- Rec #17:** Establish fixed duration Timelines to provide adequate opportunity for considered and timely comments and replies.
- Rec #21:** Introduce forecasts of Upcoming public comments topics to facilitate community planning & participation.

Staff developed a program to implement the above recommendations in two phases as shown in the table below:

Implementation Phases	Recs	Effective Date
Phase I included ICANN.org website design improvements to streamline presentation and navigation; Staff templates for consistency; and Upcoming topics forecasting.	#21	1 Jul 2011
Phase II included the introduction of Comment-Reply cycles, Stratification (i.e., categories), and <u>minimum</u> fixed duration timelines of 21 days each for initial comments and replies.	#15, #16, & #17	1 Jan 2012

Approximately one year after those enhancements were introduced, Staff performed an analysis to determine what could be learned based upon actual community usage and participation patterns. That



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

report, entitled “Public Comment Data Analysis (Jan 2010-Dec 2012),” was published in May 2013 and is available at this link: <https://community.icann.org/x/CB5-Ag>.

Perhaps the most significant finding of the May 2013 report was that the ATRT1 recommendation to introduce a Reply Cycle protocol was not being utilized according to the published instructions. In fact, after cleaning up the raw data to remove submissions that did not meet the original criteria (73%), the average number of legitimate Replies to Public Comment solicitations between Mar 2012-Dec 2012 was less than **1.0**; moreover, 70% of all solicitations received no qualified Replies and another 18% received one Reply.

ATRT2 Phase (Q1/2015-Q4/2015)

A decision was taken in May 2014, among other Public Comment enhancements discussed below, to suspend the Reply Cycle protocol. After working through website development revisions and implementation logistics, that change took effect for all solicitations opening on or after 26 January 2015.

In light of those developments as well as recommendations arising from ATRT2, Staff decided to update the Public Comment Data Analysis to incorporate solicitations from 2013 and two quarters of 2014 (18 months). That report, published in January 2015, represented a data refresh of all Closed Public Comment solicitations from January 2010 through June 2014 (4.5 years total) and is available at this link: <https://community.icann.org/x/xpAQAw>.

In the above-referenced report edition, there were **286** individual Public Comment solicitations analyzed and its conclusions corroborated those from the May 2013 report as quoted below from Section 4.0-Overall Conclusions:

*“As initially reported in May 2013, the extended data set continues to show that the Reply Cycle is not being utilized as originally envisioned. After examining the submissions for each solicitation from January 2013–June 2014 and appending that data to what had been reported from March 2012–December 2012, over 77% of replies were determined to be original comments submitted after the deadline. That figure is up 4% compared to the May 2013 data analysis. The average number of adjusted Replies continued to hover at approximately **1.0** per solicitation and **80%** of all solicitations during that period received 0 or 1 Replies after data cleanup⁶.*

Staff determined mid-way through 2014 that the Reply Cycle should be suspended. That decision is supported by this extended data analysis, which shows that the preponderance of Replies are simply late submissions forwarded after the original Comment Period closed.”

⁶ The statistics in this paragraph all increased slightly once the data points were extended to include all of 2014.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

In addition to the suspension of Reply Cycles, other changes to the Public Comment process were implemented beginning with 2015 including:

Enhancement Title
1) Suspend "Reply Cycles"
2) Introduce Minimum 40-Day Comment Period Default Target
3) Reinforce Clear Deadlines for Staff Summary Reports
4) Implement Staff Summary Report Community Inquiry Protocol

Process Improvement
1) Redirect All Public Comment Requests through the Policy Development Support Department
2) Establish Staff Advisory Committee

This report will not attempt to address the above improvements because a separate analysis, entitled "Special Report on ATRT2 Enhancements Effectiveness (15 Dec 2015)," was published to determine their overall effectiveness and is available at this link: <https://community.icann.org/x/aI9IAw>.

Post-ATRT (Q1/2016-Q4/2016)

Now that all of the changes introduced as a result of both ATRT1 and ATRT2 have been reported and analyzed, Staff has decided to continue Public Comment reporting on; however, it is no longer relevant to highlight and compare the various ATRT phases and, considering the significantly larger data pool available, the charts/graphs in the current report are summarized annually instead of quarterly.



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Appendix B: Public Comment Solicitations Receiving Zero Comments (2010-2016)

Public Comments Title	Close-Date	Comments
One & Two-Character .CAT Domains	17-Jan-10	0
RSSAC Review – Draft Working Group Report	5-Jun-10	0
GNSO Council Operations Work Team and Constituency and Stakeholder Group Operations Work Team Recommendations	18-Jul-10	0
Transparency and Accountability Wiki Project -- ICANN Board Resolutions - Draft - 2009	26-Jul-10	0
Public Participation Committee Webinar Information	3-Nov-10	0
Proposed Changes to the ICANN Bylaws Article XI: Advisory Committees Relating to the Charter and Membership of the Security and Stability Advisory Committee (SSAC)	2-Dec-10	0
Proposed Bylaws Amendment to Create a Non-Voting Chair-Elect to the Nominating Committee	10-Dec-10	0
Interim Paper Inclusion of IDN ccTLDs in the ccNSO	21-Jan-11	0
Permanent Charter of GNSO's Commercial Stakeholder Group Completed – Public Comment Invited	23-Jan-11	0
Proposed ICANN Meeting Dates 2014 - 2016	8-Mar-11	0
ccNSO DRDWG Final Report	15-Mar-11	0
Proposed Changes to Section 5.0 of the GNSO Council Operating Procedures	26-Mar-11	0
Proposed Revisions to Chapters 3 and 4 of the GNSO Council Operating Procedures Relating to Proxy Voting	9-Aug-11	0
IDN ccPDP WG 2 – Draft Final Report	15-Dec-11	0
Inter-Registrar Transfer Policy Part B – Recommendation #8 and #9 Part 2 – Staff Proposals	31-Dec-11	0
Global Policy Proposal Recovered IPv4 Address Space	4-Apr-12	0
WHOIS Technical Requirements Survey - Draft	20-Jun-12	0
ICANN's FY 13 Security, Stability and Resiliency Framework	2-Jul-12	0
Amendments to Article XI, Section 2.3 of the ICANN Bylaws - DNS Root Server System Advisory Committee (RSSAC)	2-Feb-13	0
Consultation on Internet Number Resources Performance Standards	11-Dec-12	0
Preliminary Issue Report on Uniformity of Reporting	22-Mar-13	0
Proposed Modification of GNSO PDP Manual to Address the Suspension of a PDP	6-Apr-13	0



PUBLIC COMMENT DATA ANALYSIS

Period: January 2010-December 2016

Public Comments Title	Close-Date	Comments
Locking of a Domain Name Subject to UDRP Proceedings Policy Development Process (PDP) Recommendations for Board Consideration	23-Aug-13	0
Consultation on gTLD Delegation and Redelelegation User Instructions and Source of Policy and Procedures	1-Oct-13	0
Proposed Modifications to GNSO Operating Procedures to Address Resubmission of Motions and Working Group Self Assessment	3-Mar-14	0
ICANN Cross Community Working Group on Internet Governance's Submission to NETMundial	29-Apr-14	0
Registrars Stakeholder Group (RrSG) Charter Revisions (May 2014)	20-Jun-14	0
Study to Evaluate Solutions for the Submission and Display of Internationalized Contact Data	3-Jul-14	0
.NGO and .ONG Registry Services Evaluation Process Request - Introduction of Technical Bundling	8-Jul-14	0
Registry Services Technical Evaluation Panel (RSTEP) Report on Public Interest Registry's Request to Implement Technical Bundling in .NGO and .ONG	5-Aug-14	0
Proposed Changes to GNSO Operating Procedures	8-Oct-14	0
.NGO/.ONG Registry Agreement Amendment - Mandatory Technical Bundling of Second-Level Domains	26-Nov-14	0
Proposal for Georgian Script Root Zone Label Generation Rules (LGR)	28-Oct-16	0

Total = 33; sort order is chronological