

Writing for Public Comment



NCUC Noncommercial
Users Constituency



“Decisions at ICANN are made by people who show up. People who scream most loudly.”

- Kathy Kleiman

Communicate Effectively



NCUC Noncommercial
Users Constituency

- ⦿ Speaking
- ⦿ Listening
- ⦿ Writing

Communicate Effectively



NCUC Noncommercial
Users Constituency

- ⦿ Verbally communicate your ideas
- ⦿ Listen to and comprehend the responses
- ⦿ Summarize in writing

Public Comment Process



Most effective way for members to participate in ICANN policy development

Public Comment Process



- How prepared are members to collaborate?
- How many have collaborated previously?
- What qualities and skills are required of the “penholder”?

Public Comment Process



NCUC Noncommercial
Users Constituency

- Developing writing skills develops confidence
- Broadens pool of contributors
- Diversity and new ideas
- Stronger voice

Writing for Public Comment



Prepare members to collaborate towards developing a succinct, coherent response to issues raised during a Policy Development Process (PDP)

Writing for Public Comment



Reasons You Write

- Opportunity to build NCUC through constituent feedback
- Share diverse opinions as first step towards collaboration



Reasons You Write

- Opportunity to engage outside of ICANN as a member of ICANN community

Plan Your Comment

- ◉ Understand the rules and process of public comment
- ◉ Weigh content v. length
- ◉ Identify specific areas of concern
- ◉ Clearly state your reasoning, research support for your claims, present evidence



Plan Your Comment

- Establish your expertise as a constituency: distinguish your comments from others
- Add examples to support your position
- Acknowledge opposing views and explain “Why my position is the best position”

Structure Your Writing

- Address specific group or individual
- State the policy and your position on it
- Introduce your constituency and why it is uniquely qualified to comment
- Describe how your constituents would be affected



Structure Your Writing

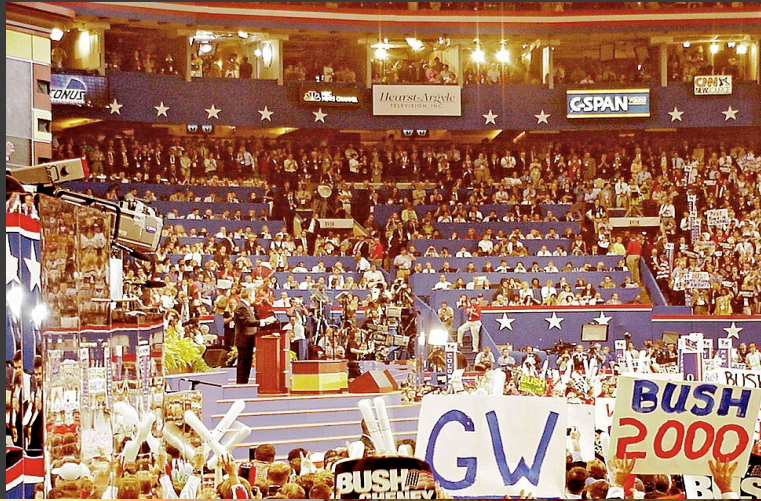
- ⦿ Recognize opposing views and offer your alternatives
- ⦿ Explain how your position improves the policy
- ⦿ Close with a compelling summary and a Call to Action



Jim Trengrove



33 year Broadcast
Journalism career



Jim Trengrove



33 year Broadcast
Journalism career

Senior Director of Communications
ICANN 2009 - 2015

ICANN 61 San Juan

ICANN 61
COMMUNITY FORUM
SAN JUAN
10-15 March 2018



icann.org

- ① Get Started
- ① Policy
- ① Public Comment

The screenshot displays the ICANN website interface. At the top, a dark blue navigation bar contains language options: English, العربية, Español, Français, Русский, and 中文. To the right of these options is a search bar labeled 'Search ICANN.org' and links for 'Log In' and 'Sign Up'. Below the navigation bar is a white header section with the ICANN logo on the left and a menu of links: GET STARTED, NEWS & MEDIA, POLICY, PUBLIC COMMENT, RESOURCES, COMMUNITY, and IANA STEWARDSHIP & ACCOUNTABILITY. The main content area features a blue background with a circuit-like pattern. On the left, a 'Join Us' section includes the text: 'We recently posted the latest Quarterly Stakeholder Update. View the report, and join us on 22 February to ask your questions.' Below this text is a dark blue button labeled 'Learn more'. On the right, a dark blue banner contains the text: 'Quarterly Stakeholder Update for FY18 Q2'.

icann.org



[GET STARTED](#)

[NEWS & MEDIA](#)

[POLICY](#)

[PUBLIC COMMENT](#)

[RESOURCES](#)

[COMMUNITY](#)

[IANA STEWARDSHIP
& ACCOUNTABILITY](#)

Welcome to the global community!

ICANN is a not-for-profit public-benefit corporation with participants from all over the world dedicated to keeping the Internet secure, stable and interoperable. It promotes competition and develops policy on the Internet's unique identifiers. Through its coordination role of the Internet's naming system, it does have an important impact on the expansion and evolution of the Internet.



[Beginner's Guide](#)

Download or view this document to learn more about how to get started.

Available in several languages.



[Online Learning Platform](#)

Take an online class to learn about [ICANN](#) and Internet governance from the community.



[Regional Engagement Events](#)

Explore engagement opportunities across the globe by region and function.

Developing Policy at ICANN

A fundamental part of [ICANN's Mission](#) is to coordinate policy development related to the Internet's system of unique identifiers.

We employ open and transparent policy development mechanisms that promote well-informed decisions based on expert advice, and in collaboration with entities most affected by policy development. [Learn how you can participate.](#)



What is ICANN Policy?

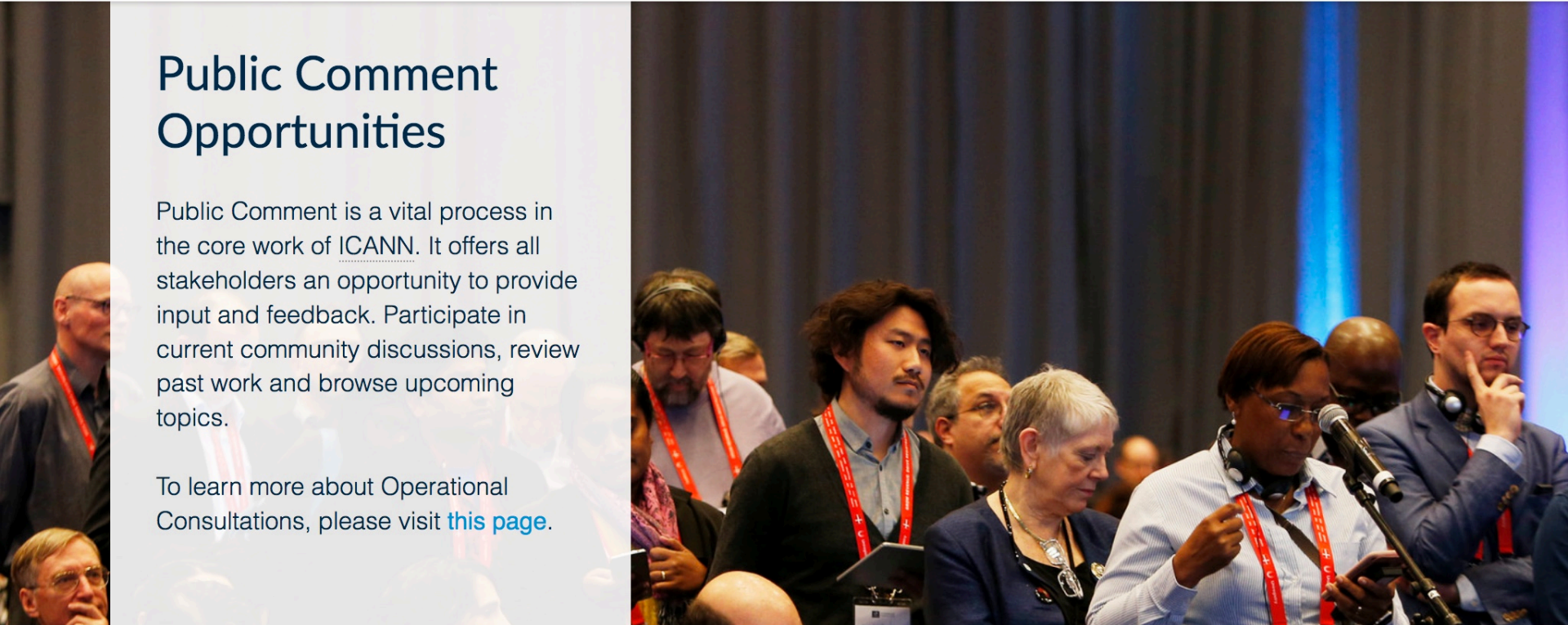
There are multiple kinds of policy within the [ICANN](#) world: formal policies related to the global internet's system of unique identifiers (DNS), operational policies, and general practices. Learn more about our Mission and Core Values and how policy is developed in the [ICANN Bylaws](#)



Public Comment Opportunities

Public Comment is a vital process in the core work of [ICANN](#). It offers all stakeholders an opportunity to provide input and feedback. Participate in current community discussions, review past work and browse upcoming topics.

To learn more about Operational Consultations, please visit [this page](#).



Open for Public Comment	Open Date	Close Date	How Public Comment Works
Maximal Starting Repertoire version 3 (MSR-3) for Root Zone Label Generation Rules (RZ-LGR)	17 Jan 2018 23:59 UTC	26 Feb 2018 23:59 UTC	Public comment proceeding feature proposals initiated by working group or department

Public Comment

Open for Public Comment

Open Date

Close Date

[Maximal Starting Repertoire version 3 \(MSR-3\) for Root Zone](#)

[Label Generation Rules \(RZ-LGR\)](#)

17 Jan 2018 23:59
UTC

26 Feb 2018
UTC

[Log in to follow](#)

Public Comment

Recently Closed for Public Comment

Close Date

Report of Public
Comments

[Operating Standards for ICANN's Specific Reviews](#)

2 Feb 2018 23:59 UTC

[Log in to follow](#)

Public Comment

Upcoming Public Comment Proceeding	ICANN Org. Contact	Estimated Timeframe
.ASIA Registry Agreement Renewal	Karla Hakansson	February 2018
<u>Description:</u> <i>Proposed .ASIA Registry Agreement for renewal.</i>		
.COOP Registry Agreement Renewal	Karla Hakansson	February 2018
<u>Description:</u> <i>Proposed .COOP Registry Agreement for renewal.</i>		

Public Comment

Public Comments Archive 2018

To view [Upcoming](#), [Open](#) or [Recently Closed](#) Public Comments, please click the appropriate link.

Year 

[January](#) | [February](#)

January		
Title	Open Date	Close Date
Enhancing Accountability - Recommendations for Diversity	26 October 2017	14 January 2018
Recommendations to Improve <u>ICANN's</u> Office of Ombudsman (IOO)	10 November 2017	14 January 2018

Public Comment

Vast differences in:

- Thought Process
- Structure
- Clarity
- Message delivery
- Effectiveness

Public Comment

No “right” way to write a public comment

Plenty of “wrong” ways

- Be Respectful
- Be Direct
- Be Brief
- Be Convincing

Public Comment

Four Examples



Public Comment

Example #1: Tone

*NCSG comments on the Draft
Recommendations of the CCWG
Accountability WS2 on
SO/AC Accountability*

Public Comment

Example #1: Introduction

NCSG welcomes the draft CCWG Accountability WS2 recommendation on SO/AC accountability.

These recommendations are an important contribution to strengthening ICANN's overall accountability and in particular that of the ICANN community.

Public Comment

Example #1: Conclusion

NCSSG welcomes the draft recommendations: they are an important contribution to the evolution of the overall accountability of ICANN and its community.

Public Comment

Example #1: Conclusion

NCSSG also looks forward to further discussion as to whether the recommendations as a whole adequately address the important issue of preventing capture.

Public Comment

Example #1: Tone

Despite the 25 recommendations, there remains a broader question that does not seem fully answered.

Public Comment

Example #1: Tone

Do the recommendations in Track 1 fully address this fundamental question?

The recommendations appear to partially address the issue...

Public Comment

Example #1: Tone

It would be useful to understand how the recommendations concretely address the issue of capture in more detail

Public Comment

Example #1: Tone

NCSG suggests that it might also be useful for there to be a fuller understanding

Public Comment

Example #2: Structure

***Non-Commercial Stakeholders Group
on the Draft Report for Public
Comment on the Review of the At-
Large Community by ITEMS
International***

Public Comment

Example #2: Structure

22 numbered paragraphs into 5 “issue” sections and but no relationship between numbers and the issues

Public Comment

Example #2: Structure

Introduction:

At-Large has been dominated by a few people...

It is too focused on internal committees

It is not focused on holding ICANN (via the Board)

Public Comment

Example #2: Structure

Introduction:

...perceived mission overlap between At-Large and NCSG's constituencies

...random selection rather than merit bases selection...worth trialling

...out of scope to recommend new gTLD auctions be used to fund At-Large

Public Comment

Example #2: Structure

Headlines:

Relationship between between the NCSG and the At-Large Community

Random Selection is Imperfect But Could it be Better than the Status Quo?

Public Comment

Example #2: Structure

Headlines:

*Opposition to New gTLD Auction Proceeds
Fund Being Used to Fund the Ongoing
Activities of At-Large, Unless that is the
Community's Decision*

Other Observations

Public Comment

Example #2: Structure

Conclusion:

*Thank you again for inviting our input...
We are grateful to ITEMS International...
We hope you will find our comments helpful
We would be delighted to provide you with
further comment*

Public Comment

Example #3: Individual
ICANN's IRT Comments – Alex Gakuru

Introduction:

My name is Alex Gakuru. I am the Chairman, ICT Consumers Association of Kenya, an irrepressible individual Internet users' rights lobbyist...hereby making a personal view of the IRT proposal before ICANN.

Public Comment

Example #3: Individual

Free Expression – The proposal will curtail online expression

Fair Use - IRT will further criminalise innovation

Competition – As corporations grow...competition may be stifled

Public Comment

Example #3: Individual

Therefore, in view of my above concerns, I pray that ICANN rejects the IRT proposal

Designing and Writing an Effective Public Comment

Plan Your Position

- ⦿ Understand policy and position you are taking for or against it
- ⦿ Try to limit your comment to a specific concern



Designing and Writing an Effective Public Comment

Research Your Comment

- ⦿ Know the policy and the facts surrounding it
- ⦿ Determine how your position would make the policy better

Designing and Writing an Effective Public Comment

Write Your Comment

Paragraph #1

- Identify yourself and state the policy at hand
- Recognize the work of volunteers

Designing and Writing an Effective Public Comment

Write Your Comment

Paragraph #2

- Support your objection with reason and evidence
- Explain why you or your constituency is qualified to comment on this issue

Designing and Writing an Effective Public Comment

Write Your Comment

Paragraph #3

- Connect to the people you represent
- How will they be affected by policy?
- Distinguish your comment from others

Designing and Writing an Effective Public Comment

Write Your Comment

Paragraph #4

- Propose your alternative solution along with a Plan of Action
- List key indicators of success
- Present a timeline to monitor success

Designing and Writing an Effective Public Comment

Write Your Comment

Paragraph #5

- Be compelling in your summation
- Express appreciation to the policy makers
- Urge a Call to Action around your alternative solution

Public Comment

Example #4: Individual

IP Justice Comments on IRT Report: “IP Justice Opposes the IRT Report Proposals

Public Comment

Example #4: Individual

IP Justice is a nonprofit public benefit organization based in San Francisco that promotes balanced intellectual property rights in Internet law and policy.

Public Comment

Example #4: Individual

IP Justice is opposed to all the major proposals contained within the IRT Report as being beyond the bounds of trademark law and beyond the scope of ICANN's technical mandate.

Public Comment

Example #4: Individual

...shift the burden and the cost of protecting brands over to Internet users and away from the private companies...

...harmful impact on freedom of expression

...biased composition of the IRT Team and the secretive manner in which it did its work.

Public Comment

Example #4: Individual

Despite its hard work and long hours, which we all recognize and appreciate, the IRT Team failed its mandate to find a solution acceptable to all.

Public Comment

Example #4: Individual

ICANN should ensure other stakeholders' views can be heard (and not only the IP Constituency) by providing travel support to noncommercial users and others who have significant concerns with the proposals but no resources to participate.

Public Comment

Example #4: Individual

Conclusion:

ICANN must not allow the constant threats from intellectual property lobbyists prevent the organization from introducing new gTLDs and creating an Internet that benefits everyone.

Public Comment

Example #4: Individual

Conclusion:

Please do not allow their threats to hold up the process any further by continuing with the IRT Report in any form.

Public Comment



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Thank you!

Any questions?