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**AT-LARGE ADVISORY
COMMITTEE**

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**ALAC Statement
On the Draft 2011 - 2014 Strategic Plan**

Introduction

By the Staff of ICANN

The statement on the Draft 2011 - 2014 Strategic Plan was originally drafted by Olivier Crépin-Leblond, Chair of the At-Large Advisory Committee, and published on 5 January 2011. The ALAC Executive Committee revised the document during its call on 6 January.

The second revision of this statement (the present document) incorporates suggestions by the members of the five regional At-Large organizations and was published on 10 January. The regional comments on the Draft Strategic Plan are listed in the appendix to this document.

The At-Large community took part in several calls and meetings with relevant ICANN staff members between November and December 2010. An overview of the briefings and discussions held on this public consultation is available on the community workspace under: <https://community.icann.org/display/atlarge/ICANN+Strategic+Planning+Development+2011+-+Community+Workspace>

On 10 January, the At-Large Staff transmitted the statement to Kurt Pritz, the ICANN staff person responsible for the [public consultation process](#) on the Draft 2011 – 2014 Strategic Plan with a note saying that the document was currently undergoing ALAC ratification.

(End of Introduction)

The original version of this document is the English text available at www.atlarge.icann.org/correspondence. Where a difference of interpretation exists or is perceived to exist between a non-English edition of this document and the original text, the original shall prevail

ALAC Statement on the Draft 2011 - 2014 Strategic Plan

January 10th, 2011.

Introduction

The At-Large Advisory Committee (ALAC), in close collaboration with the At-Large Regional At-Large Organizations (RALOs), At-Large Structures (ALSes) and individual end-users, which together make up the At-Large community, is pleased to submit the following statement in response to the call for public comments on the 2011-2014 Strategic Plan. The ALAC statement highlights suggestions and concerns centering on the four focus areas of the draft 2011-2014 Strategic Plan: 1) DNS stability and security; 2) core operations, including IANA; 3) consumer choice, competition and innovation; and 4) a healthy Internet Ecosystem. In preparing this statement, the full strength of the bottom-up, consensus-based process was utilized with significant comments being made by the regions.

In line with our policy of full transparency, this document links to an Appendix where the original RALO comments submitted in the bottom-up process consultation can be found in full. The ALAC, when voting on this document, will exclude voting on the contents of the Appendix.

General Comments on Process and Structure

- ICANN Planning Cycle

While the planning cycle as published seeks to embrace input from a greater portion of the ICANN constituency and is altogether a laudable objective, the ALAC would encourage further fine tuning. For example as it is now laid out, a significant portion of said community is disadvantaged purely from the timing extended for participants: it chooses a time period of high holy days of three (3) of the major religions and when the bulk of our stakeholders are focused on other things, including family. For these and other reasons, the ALAC urges ICANN to revamp the planning cycle with a more concerned eye on the timing of events.

- New Plan Goals

The At-Large community fully supports the new plan goals of reorienting objectives to distinguish areas of control vs. influence plus adding measurable indicators of plan success. The ALAC welcomes these developments and recommends performance evaluation criteria (indicators and/or metrics) be applied for greater accountability.

- Response to Community Input

The At-Large community is pleased to see the new process for engaging community input at an earlier time, inclusive of definitive measures to demonstrate the impact of such input. The ALAC is unanimous that these developments can only lead to better accountability and legitimacy with the community as a whole. In our view, this reinforces the notion of the bottom-up process within ICANN.

- Plan for getting Board Approval

The new plan for getting Board approval is a significant improvement over the process it replaces. The planning team consultations with Working Groups and Constituencies have engaged Constituencies immediately and helped bring ownership of the plan closer to the edges. The At-Large community hopes that this process will be upheld in future Strategic Plan development cycles and even reinforced through enhanced collaboration between itself and the planning team. We will strive to ensure better communication with ALSes so that the edges of the At-Large organisational structure have a greater voice with which to enhance

the process of global involvement in this novel bottom-up global stakeholder governance model.

Comments on Content Regarding the Four Strategic Focus Areas

General Comments

The At-Large community notes and commends ICANN on the efforts to streamline the development of the latest Strategic Plan, especially the initiative to improve the documentation of the Plan under the four (4) strategic pillars for ICANN. The At-Large community is especially keen to see further main-streaming of the principle of equal value accorded the views of end users in the multi-stakeholder bottom-up approach to policy development enshrined in the Affirmation of Commitments. So that this development is strengthened and, ultimately, seed (i.e. facilitate, nurture, develop and strengthen) increased end user participation, the ALAC urges further effort in translation of working documents into the five (5) UN languages, especially those used for stakeholder consultations.

1. DNS stability and security

DNS stability and security is of primary importance for end users who wish to use an Internet that is as reliable as possible. Any focus by ICANN to enhance stability and security is welcome.

The At-Large community is keen to see the implementation of DNSSEC given higher priority in ICANN operational plans and recognizes the initiative to provide DNSSEC training to TLD operators around the globe as an important component of the process. In this context, we are particularly pleased and supportive of the proposed Staff initiative under “cooperative TLD training in developing countries”. This is an especially important development given the additional security risks (such as phishing) spawned by the introduction of IDNs to the Internet Ecosystem and thus emphasizes our statement that ICANN should increase international participation in unique identifier security, inclusive of training in end user communities. The At-Large community consensus is for a closer synergy of user communities, especially the IDN language groups, in the development of security policies and measures to mitigate these risks.

The definition and design of other operational indicators (or Key Performance Indicators - KPIs) which could be used for strategic purposes is currently missing from the strategic objectives. If KPIs existed, it would be possible to track, for example, a measure of the number incorrectly synthesized DNS responses. Overall, this should be part of a set of definable metrics of what constitutes DNS stability (as opposed to instability). The next step would then be to ensure that contracts and staff operations work towards maximizing the stability indicators.

The mention of IPv6 roll-out, adoption and engagement at the three levels (Community Work, Strategic Projects and Staff Work) is a positive and welcome development.

The At-Large community also welcomes the roll-out of the Resource Public Key Infrastructure (RPKI) in the American Registry for Internet Numbers (ARIN) region and in other regions too.

However we are concerned that the Strategic Plan is pre-empting the outcomes and recommendations of the Joint DNS Security and Stability Analysis Working Group (DSSA--WG) with the sentence currently written in this section of the document:

"ICANN will follow the lead of its community working groups to develop an approach to the establishment of solutions such as coordination of an emergency response team (DNS CERT) to address one of the issues of Internet security."

The ALAC recommends this text be deleted. An amended Paragraph 4 of this section of the document would thus read:

"Increase international participation in unique identifier security. Attacks on the unique identifier system can come from anywhere around the globe. Strong international security systems and skills are first line deterrents to bad behavior. Staff and community work will focus on global security outreach and collaboration with Regional Internet Registries (RIR) operators to improve overall security. ICANN will follow the lead of its community working groups to develop an approach to the establishment of solutions to address issues of Internet security. Also, community work needs to facilitate the acceptance of internationalized registration data in the Whois database."

The proposition of coordinating DNS global risk management fails to mention lessons learnt from past alerts, for example the "Conficker .C" facts, so the most recent "global risk management" event of importance is overlooked. This is unfortunate as there is much to be learned from the response about cost, timeliness and accounting. In addition to this point, we argue that ICANN should develop a plan for Disaster Recovery and Business Continuity for its own operations.

ICANN should prioritize its efforts towards supporting regional and local efforts for the promotion of Stability, Security & Resiliency (SSR) of the unique identifier systems, instead of duplicating or commandeering its centralization. At this time, ICANN's role shall be best served, as a coordinator and facilitator, by directing its resources and funds towards regional and local efforts in the promotion of DNS security as well as IPv6 along with IP security. This includes resources and funds for RIRs, ALSes, and other appropriate organizations that have initiated work SSR as well as to support others that have not yet started. ICANN's priority should be to support regional and local organizations to become leaders in SSR promotion rather than followers of ICANN. This supports the arguments for empowerment of the local communities described below.

2. Core Operations including IANA

The At-Large community supports the decision of ICANN to submit a proposal for the IANA contract renewal based on ICANN's track record and other factors including the confidence that ICANN's multi-stakeholder model of bottom-up governance significantly contributes to good standing with regards to core operations.

The aim of improving the ongoing efficiency and effectiveness of policy development and implementation processes of the multi-stakeholder model that engages the community is fully supported by At-Large. Furthermore, At-Large community agrees with the GNSO initiative to improve the PDP and also encourages and supports the following additional initiatives:

- The continuous improvement process towards operational excellence is very welcome and the At-Large community fully supports ICANN's engagement with the technical community including the IETF and root server managers.
- In particular, the RALOs take positive note of ICANN's willingness to provide a transparent and collaborative model for root server operations to the international Internet community. They fully support the fact that the IANA contract should be

renewed based on its track record and take into account ICANN's independence and internationalization.

- The suggested application of process improvements by the European Foundation for Quality Management model is seen as a positive source of Service Level Agreement commitments.

3. Consumer choice, competition and innovation

The ALAC and the At-Large community are particularly concerned that the 2011 - 2014 Strategic Plan notes and takes into account the outcomes of the cross community work which will be resulting from the ICANN Board Resolution in Cartagena, available at: <http://icann.org/en/minutes/resolutions-10dec10-en.htm#6>; the relevant statement being:

“Resolved (2010.12.10.30), the ICANN Board requests advice from the ALAC, GAC, GNSO and ccNSO on establishing the definition, measures, and three year targets for those measures, for competition, consumer trust and consumer choice in the context of the domain name system, such advice to be provided for discussion at the ICANN International Public meeting in San Francisco from 13-18 March 2011”.

On this issue, the ALAC re-iterates its comments made in previous years. This includes our call for greater strategic attention to be given to ‘end-user rights’ and we appreciate the increased focus on this during the coming planning cycle. We are very pleased that IDNs are providing consumer choice and hope that the new gTLD programme will be beneficial to healthy competition but also to an increase in regional participation in the industry. ICANN should follow its commitments set forth in the Affirmation of Commitments and prioritize efforts to implement complete IDN TLDs policies and mechanisms that serve the most needed IDN communities, as described in previous ALAC statements addressing this issue. To this extent, the strategic goal of "more languages and cultures" should far exceed the one of a single application process, something not apparent in the current Draft Strategic Plan.

Choice does not only come from a select few regions of the world, but from having a local partner, accessible locally and with an understanding of local cultures. Both financial and professional support shall be required to enable disadvantaged communities to effectively participate in the new gTLD Ecosystem towards empowering consumer choice, competition and innovation. All RALOs are therefore highly supportive of the view that levying high application fees for all applicants emphasizes the disparity between the “haves and have-nots” (or developed and developing countries). Through Joint Applicant Support, it is our strong desire that the new gTLD programme benefits local communities directly. This has been a key At-Large initiative since the 2009 Mexico City At-Large Summit.

Also emphasized is the notion of mitigating malicious conduct. The At-Large community is ready to help drive the process of developing a Registrants Rights Charter in collaboration with the rest of ICANN.

Conducting education and training programs in partnership with ISOC, NSRC and other like-minded organizations, local operators and local Internet communities is an excellent approach and we believe that many of these programs could also be conducted by ICANN constituencies, such as At-Large Structures and Regional At-Large Organizations according to their competencies in the subject. For example, each ICANN meeting in Africa should be an opportunity to conduct training workshops for the African communities.

4. A healthy Internet Ecosystem

The At-Large community fully supports the recommendations contained in this sub-section. As a reminder, At-Large is a core constituent of each one of the core strategic objectives outlined in this section. In particular, we welcome Internet Governance education and would urge ICANN to consider making better use of the networks and unique outreach strengths of the At-Large community's organizational structure of five RALOs and current 129 ALSes present in over 80 countries around the world.

- One unified, global Internet.

Nearly all of ICANN's contractual counter-parties to registry agreements are legally domiciled in the North American Region, and with the exception of name server constellations, are operationally contained in the North American Region. The same is true of the majority of its registrars, four of which alone account for 50 percent of all gTLD registrations. ICANN would need to truly internationalize this function in order to reach a truly healthy Internet Ecosystem.

- Building stakeholder diversity.

The At-Large community agrees that continued internationalization of ICANN is crucial to maintaining a single, global interoperable Internet and a single Internet zone file used globally. Empowerment of local communities is essential for capacity building. The At-Large community would welcome working with ICANN to define its own function within Public Participation and Accountability, in time for it to be included in future Strategic Plans. This plan would include "outreach" and "in-reach" (i.e., effective engagement of current At-Large ALSes), capitalising on the fellowship programme and the provision of on-line interactive workshops and material to educate community leaders and participants about ICANN.

We therefore re-iterate the At-Large community's plan of reaching out to communities worldwide so as to have, at least, one (1) At-Large Structure (ALS) per country. We need a regional approach and an in-reach/outreach program for the propagation of knowledge and the raising of awareness in the Internet community and beyond.

This unique resource needs to be sustained, through one localised General Assembly (GA) per RALO per year, as well as an institutionalized At-Large Summit every three (3) years, with an interval no larger than four (4) years to keep grass-roots interest high. The subjects on which the ALSes would work on would consist of a mix of ICANN-defined strategic subjects as well as grass-roots-defined issues, whether local, regional or international.

It is worth remembering that during the signature of MOUs between ICANN and each of the five RALOs, there was no doubt about the commitment of support for the RALOs including financial assistance to ensure their holding of a regular General Assembly (not including translations and interpretation).

Erratum: whilst the At-Large community welcomes the formalization of its input into Board discussion, it is erroneous to say that the new Board Seat "represents" the At-Large community; rather, it is a seat whose occupier is "selected by" the At-Large community.

- Improve communications.

The third strategic objective seems under developed relative to the other three, and adding a technical and policy journal, similar to the work Ole Jacobson has been doing, initially for Dan Lynch's InterOp, and subsequently for Cisco, in his Internet Protocol Journal, would be more useful than more web ephemera. For reference to the full article please see:

http://www.cisco.com/web/about/ac123/ac147/about_cisco_the_internet_protocol_journal.html

While recognizing the ICANN effort for a multilingual working environment, the At-Large community considers that for an international organization, more commitment is needed to provide translation of all ICANN documents, and simultaneous interpretation in all meetings (face to face or remote). Whilst we acknowledge the hard work done by the new translators group led by Christina Rodriguez (ICANN staff) we ascertain that this group should be sustained. Due to technical and specific vocabulary used in our meetings it is of utmost importance to maintain a stable team of translators.

Additionally, interpretation is urgently needed for the fellowship program which is now restricted to English speakers only.

The number of Languages should be increased, not only to include Brazilian Portuguese native speakers in the region but also to other languages such as Chinese, Russian, Arabic, etc.

- Ongoing accountability and transparency.

The fourth strategic objective references fact-based policy development and decision making.

Data as a necessary predicate condition to "ensure the stable and secure operation of the Internet's unique identifier systems", is absent. This is very unfortunate as in practical terms, for each year of the past decade, persons with nothing more than beliefs, which may as well be religious beliefs, have dominated ICANN's policy making.

The available data is not good. We are running out of IPv4 addresses, and therefore must make a partially planned transition without widespread test-bed experience of the new infrastructure. The routing system too is at the limits of its scalability. There are pervasive peer-to-peer overlay networks which are incongruent with economic models, and therefore the source of fundamental legal struggles over ownership and control. The security and stability of the naming, addressing and routing infrastructure is problematic, independent of anything ICANN is on record contemplating as its plan of record.

Absent operational data concerning unique endpoint identifiers, unique routing identifiers and protocols, stable and secure operations are indistinguishable from unstable and insecure operations.

The DNS remains a private resource, where access to profoundly important operational data necessary for basic research on the range of meaningful policy alternatives is at the whim of commercial entities acting under private law.

- International Engagement.

Demonstrably ALAC and At-Large is already the most international (in terms of global representation and outreach to regions as measured by county), component part of ICANN and is directly connected to the Internet end user and domain name registrant. As such we not only support and endorse ICANN taking a Strategic and Prioritized approach to enhanced, effective and meaningful international engagement with other key actors and

participants in the Internet Ecosystem, but we also believe that our local, country and regional local knowledge, experience and ongoing interaction with these various actors and stakeholders in the local Internet communities we represent is an under-utilised yet highly effective resource in this activity that should be recognized in the ICANN Strategic plan 2011-2014.

- On Trust in ICANN's stewardship.

ICANN participation in Internet Governance events such as the IGF and WSIS forum is of high importance. Some RALOs think that this participation, far from being limited to formal speeches, or an ICANN parallel event, needs to be expanded into organizing substantial workshops addressing strategic subjects of worth to ICANN taking advantage of the large potential attendance of the forum. Such participation will give ICANN more visibility and better credibility. The impact of these workshops would be greater if they were organized and/or jointly organized by ICANN constituencies rather than being limited to participation from only ICANN staff and/or Board.

Conclusion

Only through valuing the knowledge and perspective of end-users towards Internet rights and policies can ICANN reap future benefits for the proper use of ICTs in the specified public policy consideration makers.

We strongly believe that consideration of the comments in our statement will contribute to the strengthening of ICANN's 2011-2014 Strategic Plan. They fully reflect the results of the open and transparent bottom-up policy development process used within the vibrant global At-Large community.

In order to ensure a full circle of communication which will provide us the ability to inform our community, and so that we can learn from this process, we request brief, yet comprehensive, feedback on our statement, including the extent to which our comments were incorporated.

Details of RALO and other comments received in the process of creating this Statements can be found in the Appendix at the Confluence Wiki page:

<https://community.icann.org/display/alacexcomm/ALAC+Statement+on+Draft+2011-2014+Strategic+Plan+-+Appendix>