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AT-LARGE ADVISORY COMMITTEE ALAC STATEMENT ON COMPETITION, CONSUMER TRUST, AND CONSUMER CHOICE REVIEW TEAM (CCT) FINAL REPORT & RECOMMENDATIONS

Introduction

On 08 October 2018, public comment opened for the [Competition, Consumer Trust, and Consumer Choice Review Team \(CCT\) Final Report & Recommendations](#). The At-Large Consolidated Working Group (CPWG) decided it would be in the interest of ALAC to develop a statement on behalf of Internet end users. During the CPWG meeting that week, members of the working group discussed the comment and assigned penholders to draft the statement.

On 06 November 2018, Holly Raiche, At-Large Advisory Committee (ALAC) Member of the Asian, Australasian and Pacific Islands Regional At-Large Organization (APRALO), drafted an initial statement on behalf of the ALAC. ICANN policy staff in support of the At-Large community sent a call for comments on the statement to the At-Large community via the ALAC work mailing list. The At-Large community and ALAC Members began commenting on the topic on its [At-Large workspace](#).

On 26 November 2018, Jonathan Zuck, member of the North American Regional At-Large Organization (NARALO) updated the original draft with input from Bastiaan Goslings, ALAC Member of the European At-Large Regional Organization (EURALO).

On 11 December 2018, after consultations with the At-Large community and feedback from members of the CPWG, the final statement was posted to the workspace.

On 11 December 2018, the ALAC Chair, Maureen Hilyard, requested that the statement be transmitted to the ICANN public comment process, copying the ICANN staff member responsible for this topic, with a note that the statement is pending ALAC ratification.

On 14 December 2018, staff confirmed that the online vote results in the ALAC endorsing the statement with 15 votes in favor, 0 votes against, and 0 abstentions. Please note 100% (15) of the 15 ALAC Members participated in the poll. The ALAC Members who participated in the poll are (alphabetical order by first name): Bartlett Morgan, Bastiaan Goslings, Hadia Elminiawi, Holly Raiche, Humberto Carrasco, Javier Rua-Jovet, Joanna Kulesza, John Laprise, Kaili Kan, Marita Moll, Maureen Hilyard, Ricardo Holmquist, Sebastien Bachollet, Seun Ojedeji and Tijani Ben Jemaa. You may view the result independently under: <https://www.bigpulse.com/pollresults?code=1336289xiPGyiTLCI9nc6Wzelqe>

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Introduction

The At-Large Advisory Committee (ALAC) appreciates the considerable amount of effort that has clearly gone into the Competition, Consumer Trust and Consumer Choice Review Team (CCT)'s analysis and Report. As the principal voice of end users, within the ICANN community, the ALAC are especially interested in the findings and recommendations from the CCT review, particularly in the areas of Choice and Trust.

As specified in our comments to the interim report, the ALAC is supportive of all of the recommendations in this report, including the new ones relating to the unfortunate findings regarding DNS abuse in the New gTLDs. It is also worth reiterating that the ALAC do not share a sense of urgency when it comes to subsequent procedures but instead believe the community should address all of the deficiencies in the 2012 program before accepting additional applications.

The first recommendation, surrounding the improved attention to data collection and use in policy development inside ICANN is perhaps the most critical recommendation in the report given the extent to which anecdotal evidence pervades most community discussions. The unavailability of data and a culture unused to its role continues to hamper policy development another discussions within ICANN.

While controversial, the recommendation to discuss a potential DADRP has merit given the high rates of abuse in some new gTLDs and the apparent lack of tools at the disposal of Contract Compliance to address it. The CCT recommendations include such tools but some sort of backstop in the form of a 3rd party adjudication mechanism that looks at a registry holistically might be necessary.

It is also clear that better consistency is needed in the application evaluation and review process, including such issues as string confusion and review by the advisory committees including SSAC, GAC and ALAC.

Finally, the ALAC continues to believe in the importance of the gTLD program's expansion into communities and underserved regions (the so-called "Global South").

The ALAC provides its continued support for the recommendations that we articulated in our previous comments, but wants to bring particular focus on the following recommendations:

- **Recommendation 1 concerning Chapter 5 Data-Driven Analysis**

Support. As ICANN is increasingly attempting to develop its path forward to comply with international privacy regimes via the EPDP and the Access Model, developing a workable system for data collection is preeminent but should not distract from the GAC's work in this regard.

- **Recommendations 8 - 10 concerning Chapter 7 - Consumer Choice**

Support, but the CCT should defer Recommendation 10 (about privacy protections) until the recommendations from the EPDP and Access Model are finalized.

- **Recommendations 11 - 13 concerning Chapter 8 - Consumer Trust**

Support. The expectation by users is an essential feature for consumer trust. The ICANN community must instill trust between the relationship between the name and the website content to ensure internet users are accessing the content they seek.

- **Recommendations 14 - 25 concerning Chapter 9 - Safeguards**

Support. A healthy DNS system relies on competition and diversity of companies, big and small, applying for domains. The ALAC believes these recommendations are necessary to accomplish that goal.

- **Recommendations 29-31, 32, 33, and 34-35 in Chapter 10 - Evaluation**

Support. Transparency is a prerequisite to maintaining the integrity of consumer trust in the DNS system and the ALAC believes the following provisions get us closer to that objective.