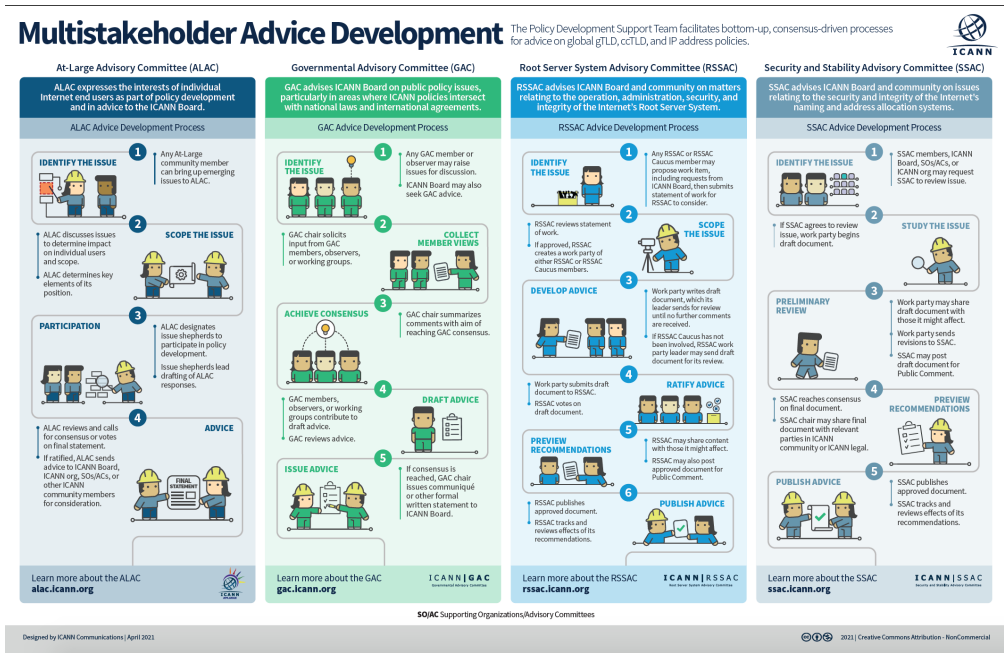


Executive Summaries: ALAC Policy Comments & Advice



Multistakeholder Advice Development

The **At-Large Advisory Committee (ALAC)** is the primary organizational home for the voice and concerns of the individual Internet end user.

Below is a compilation of executive summaries of ALAC policy comments & advice since ICANN60, providing the Internet end user perspective of ICANN policy.

ALAC Statement Definitions

» **Comment** is an ALAC statement providing input and feedback in the ICANN public comment process. **Public comment** is a key part of the policy development process (PDP), allowing for refinement of recommendations before further consideration and potential adoption. Public Comment is also used to guide implementation work, reviews, and operational activities of the ICANN organization.

» **Advice** is an ALAC statement issued to the ICANN Board as formal advice, representing the interests of the Internet end user community. Read more [here](#).

» **Correspondence** is all formally drafted, signed communications pertaining to non-confidential topics within ICANN's remit and that are directed to the ICANN Board, CEO, Executives or staff.

References

- » [ICANN Multistakeholder Advice Development](#)
- » [At-Large Policy Advice Development Page](#)
- » [At-Large Policy Summary](#)
- » [At-Large Consolidated Policy Working Group \(CPWG\)](#)

Date Submitted to ICANN Board or Public Comment	ALAC Statement (Comment, Advice, Correspondence)	Executive Summary
2022/01/19	Comment: ccNSO Proposed Policy on the Retirement of ccTLDs	Executive summary TBD

2021/12/13	Comment: Proposed Revisions to the ICANN Documentary Information Disclosure Policy	Executive summary TBD
2021/11/23	Comment: Proposal for Latin Script Root Zone Label Generation Rules	Executive summary TBD
2021/10/25	Comment: Draft PTI and IANA FY23 Operating Plan and Budgets	The ALAC noted that the FY23 Operating Plans and IANA budget look robust, indicating an improvement of PTI and IANA functions. The ALAC values the opportunity to be involved in the annual PTI planning process, and provided comments referring to the FY23 PTI budget.
2021/10/24	Comment: Initial Report from the EPDP on Specific Curative Rights Protections for IGOs	The ALAC takes the position that domain names which are identical to the respective acronyms of intergovernmental organizations ("IGOs") and which are registered and used by third parties (non-IGO registrants), run a conceivable risk of creating confusion to Internet end-users, or worse where the use facilitates fraudulent activity. End-users need to be able to trust that any information delivered using such domain names emanates from the respective IGO. Thus, the ALAC welcomes the results already achieved on facilitating an IGO's access to the ICANN-created twin dispute resolution processes of UDRP (Uniform Domain Name Dispute Resolution Policy) and URS (Uniform Rapid Suspension) in a way which preserves an IGO's privileges and immunities.
2021/09/10	Comment: ALAC Minority Statement on EPDP-TempSpec Phase 2A Final Report	In its Minority Statement, the ALAC noted that EPDP-TempSpec Phase 2 did not achieve its goal of resolving the Legal vs Natural issue, nor consensus over critical Registration Data Directory Services (RDDS) elements.
2021/08/12	Advice: ALAC Advice to ICANN Board on EPDP Phase 2	In its advice, the ALAC recommends that the ICANN Board reject the System for Standardized Access /Disclosure (SSAD) recommendations or send them back to the GNSO, as the ALAC believes the proposed SSAD will not sufficiently safeguard the interests of end users.
2021/07/19	Comment: Initial Report of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Team – PHASE 2A	In its ALAC statement in response to the ICANN Public Comment proceeding, the ALAC noted 1) it does not support Preliminary Recommendation #1 (Phase 1 Rec. 17) regarding differentiation between legal and natural persons; 2) The GNSO Council should monitor developments in relation to the adoption and implementation of relevant legislative changes; 3) the ALAC supports a standardized data element to be available for contracted parties to use, with a field to specify whether the registrant is a legal or natural entity; 4) that if there is a standardized data element, it must be populated for registrations where a differentiation is made. The ALAC also noted that it believes that arguments that other issues (such as the RDDS Legal/Natural element) is out of scope for the EPDP-TempSpec are incorrect.
2021/07/15	Comment: RrSG Draft White Paper: Registrant Protections in DNS Abuse Mitigation	The ALAC appreciated the opportunity to comment on the RrSG Draft White Paper, and welcomes ongoing dialogue with the RrSG on the issue of DNS abuse mitigation. In their comments, the ALAC suggested a potential checklist or framework in evaluating a complaint related to DNS abuse, and also provided feedback on the topics of third party abuse and the proportion of domain use.
2021/06/01	APRALO Comment: GNSO New gTLD Subsequent Procedures Final Outputs for ICANN Board Consideration	APRALO fully endorses the ratified ALAC Advice on Subsequent Procedures of 16 April 2021, and raised the following positions either in support of and/or in supplement to the said ALAC Advice: 1) Need to facilitate increased adoption of Universal Acceptance (UA) & Internationalized Domain Names (IDNs); 2) Need to facilitate increased and equitable access by "Global South", community / niche TLD applicants through the Applicant Support Program (ASP) & Community Priority Evaluation (CPE) and a ban on private auctions; 3) Need for ALAC to have automatic standing to file Community Objections (where ALAC deems necessary).
2021/05/25	Correspondence: Maarten Botterman response to Maureen Hilyard	Response from ICANN Board Chair, Maarten Botterman, to ALAC Chair, Maureen Hilyard regarding the ALAC Advice to the ICANN Board on Subsequent Procedures .
2021/05/21	Comment: GNSO Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process Phase 1 Final Recommendations for ICANN Board Consideration	The ALAC focused its response on recommendations that are consistent with ALAC principles and goals, including improving accountability and transparency; expanding uses of languages other than English; improving data gathering and supporting the use of metrics; improving the comprehensibility and intelligibility of ICANN policies and requirements to the benefit of end-users (among others); and improving access to processes.

2021/04/16	Advice: ALAC Advice to the ICANN Board on Subsequent Procedures	<i>This ALAC Advice was initially developed after the ALAC submitted a statement to the GNSO New gTLD Subsequent Procedures Policy Development Process Working Group on the completion and delivery of its Final Report of 22 December 2020 (see: ALAC statement on Subsequent Procedures PDP Final Report). The ALAC and CPWG formally reviewed, approved and submitted the Advice to the Board on 16 April 2021. The ALAC advice to the ICANN Board is in respect of the Board's consideration, approval, or adoption for onward operational design and/or implementation of the SubPro WG's recommendations as put forth by the GNSO Council. Summarily, the ALAC advice relates to 12 aspects of the SubPro Final Report policy recommendations for the New gTLD Program. Reference ALAC Chair Maureen Hilyard's Correspondence with Maarten Botterman, ICANN Board Chairman (30 April 2021). The ALAC advice was translated into the 5 UN languages and disseminated by the RALO Chairs in their regional languages.</i>
2021/04/08	Comment: Second Security, Stability, and Resiliency (SSR2) Review Team Final Report	<i>In the view of the ALAC, the SSR2 Final Report consists of a series of well-considered recommendations that would improve ICANN's fidelity to the core principles of security, stability and resiliency that lie at the heart of ICANN's mission. SSR2 builds on the work of the first SSR-RT (SSR1) and the ALAC is pleased to observe that the SSR2 has ratified most of the work of the SSR1, while noting with caution that implementation of the report is the most critical element of all, and one that is outside the remit of SSR2. The ALAC looks to ICANN org to make this Final Report (and the SSR1 Report) a reality with regard to each recommendation.</i>
2021/03/22	Comment: IANA Naming Function Review: Recommendation for an IANA Naming Function Contract Amendment	<i>The ALAC encouraged the ICANN Board to fulfil their initial report recommendations in their response to the IANA Naming Function Review (IFR) Initial Report, and as the Contract Amendment is recommendation #4 of the report, the ALAC supports it. ALAC support for this proposed contract amendment is premised on their acceptance of the IFRT's rationale that it seeks to remove a now operational impracticality arising from a legacy statement from the NTIA contract (i.e., to eliminate redundancy).</i>
2021/03/18	Comment: EU Directive on Security of Network and Information Systems (NIS 2 Directive)	<i>The European Commission's Proposal for a revised Directive on Security of Network and Information Systems (NIS2) is of great interest to the ALAC and the ALAC strongly supports this initiative. However, the ALAC noted that as the proposal is currently written, there are a number of gaps that will not allow it to fulfill its intended function, with relation to Article 2: Scope, Article 4: Definitions, Article 23: Databases of Domain Names and Registration Data. NIS 2, with appropriate enhancements as described in this comment, has the potential to greatly improve Internet security and the ALAC looks forward to its being adopted by the European Parliament and the Council and acted on by the Member States.</i>
2021/02/15	Comment: Draft FY22-26 Operating & Financial Plan and Draft FY22 Operating Plan & Budget	<i>The ALAC provided comments on the Draft FY22-26 Operating & Financial Plan and Draft FY22 Operating Plan & Budget, regarding budget, funding, expenses, travel and meetings, cost savings, as well as comments pertaining to the At-Large General Assembly Request and 5-Year At-Large Roadmap. The ALAC also commented on the evolution of the ICANN Multistakeholder Model, to facilitate diverse and inclusive participation in policy making.</i>
2021/01/22	Comment: Operational Design Phase (ODP) Concept Paper	<i>The ALAC provided comments regarding the ODP Concept Paper v2.0. The ALAC noted that they support the idea of an Operational Design Phase (ODP) to provide sufficient information to the Board in their decision process on addressing complex PDP recommendations such as those coming from EPDP Phase 2.</i>
2021/01/18	Comment: Subsequent Procedures PDP Final Report	<i>An ALAC Statement was submitted to the GNSO New gTLD Subsequent Procedures PDP WG on 18 Jan 2021 for inclusion in that PDP WG's Final Report. The statement presented the ALAC's concerns and/or dissent in respect of the PDP WG's recommendations and implementation guidance as contained in the said Final Report, in 8 areas/topics. These are (1) DNS Abuse Mitigation, (2) Enforceability of Public Interest Commitments (PICs) and Registry Voluntary Commitments (RVCs), (3) Closed Generics, (4) Applicant Support, (5) Auctions and Private Resolution of Contention Sets, (6) Community Priority Evaluation (CPE), (7) Geographic Names at the Top Level, and (8) ALAC Standing in Community Objection.</i>
2020/12/03	Correspondence: Mozilla DNS over HTTPS (DoH) and Trusted Recursive Resolver (TRR) Comment Period	<i>On behalf of the ALAC, ALAC Chair Maureen Hilyard wrote to the ICANN Office of the Chief Technology Officer (OCTO) to encourage they respond to the Mozilla Public Consultation on DoH and TRR. David Conrad responded to Maureen Hilyard and ICANN OCTO provided comments to the Mozilla consultation on 4 January 2021.</i>
2020/12/02	Comment: IANA Naming Function Review (IFR) Initial Report	<i>The ALAC encouraged the ICANN Board to fulfill the IFR recommendations as indicated in the report. The ALAC also congratulated the IANA Naming Function Review Team for the methodology used in the review.</i>
2020/11/30	Comment: DRAFT PTI and IANA FY22 Operating Plan and Budgets	<i>The ALAC noted that the DRAFT PTI and IANA FY22 Operating Plan and Budgets - especially the operating plans - are an improvement on both PTI and IANA functions, as well as a transparent initiative to show the community "Operational Improvements Activities and System Enhancements" in advance. Although there is a 30% increase in the budget from the last real results (FY20), the ALAC is glad to see that ICANN org is dedicating more resources to its core function.</i>
2020/11/23	Comment: Recommendations for Early Warning for Root Zone Scaling	<i>The ALAC made three recommendations with regards to Early Warning Root Zone Scaling: 1) Early warning signs from the anti-abuse communities should be taken seriously; 2) Proper consultation/feedback channel or mechanism should be put in place between ICANN and the various stakeholders should there be any future RSS scaling concerns; 3) In the event that any ICANN process is severely impacted as a result of the proposed scaling, there should be a mechanism in place to pause the process.</i>

2020/11/16	Comment: Proposed Amendment 1 to the .JOBS Registry Agreement	<i>The ALAC registered concerns about the requested amendments to the .JOBS Registry Agreement with Employ Media which would remove the nonprofit Society for Human Resource Management (SHRM) as sponsor and make Employ Media the sponsor of the .JOBS TLD in the absence of any clear rationale. The ALAC pointed out that the end user community places a very high value on the role of nonprofits as stewards of TLDs, as was evident in the recent controversy over a proposed sale of PIR. Finally, the ALAC noted it believes that it would be in the best interests of end users to maintain more robust oversight provision on behalf of the .JOBS community, and ultimately the end user community.</i>
2020/10/15	Comment: Reference Label Generation Rulesets (LGRs) for the Second Level	<i>The ALAC addressed four areas of concern with regards to LGRs: 1) The ALAC believes that the particular registries whose practices were used (with regards to cross-script variants in the Root Zone) should be specified; 2) Missing code points that were not considered for possible variants need to be evaluated; 3) The definition of variants for SLDs needs to be substantially expanded - otherwise the level of potential confusion, and DNS Abuse, is simply too large; and 4) As something that is critical for security and the avoidance of DNS Abuse, blocking variant names should not be optional. The ALAC made a suggested revision to the text accordingly.</i>
2020/09/29	Comment: GNSO New gTLD Subsequent Procedures Draft Final Report	<i>The At-Large Consolidated Policy Working Group (CPWG) held several single-issue teleconferences about the New gTLD Subsequent Procedures (SubPro) PDP earlier in 2020 in preparation for the Public Comment proceeding. A small team, led by ALAC Member Justine Chew, organized these sessions and gave weekly presentations to the CPWG on the topic. In September 2020, the ALAC submitted a statement on the GNSO New gTLD Subsequent Procedures Draft Final Report, the culmination of months of volunteer work in developing At-Large scorecards on SubPro topics, creating a survey on geographic names, and analyzing feedback from the community of Internet end users.</i>
2020/08/24	Comment: Addendum to the ALAC Statement on EPDP (August 2020)	<i>Although the ALAC and the BC, IPC, GAC and the SSAC each took a somewhat different approach to addressing their positions in respect to the report, the ALAC is in general agreement with the positions taken in the GAC, SSAC and BC/IPC statements. In particular, the ALAC appreciates the in-depth and insightful analysis provided by the GAC, SSAC and BC/IPC.</i>
2020/08/02	Comment: Enhancing the Effectiveness of ICANN's Multistakeholder Model – Next Steps	<i>The At-Large community is pleased to follow up on its prior ALAC statements regarding ICANN's Multistakeholder Model (see: 13 June 2019, 14 October 2019, February 2020) with this ALAC statement on Enhancing the Effectiveness of ICANN's Multistakeholder Model - Next Steps. The ALAC made recommendations on priority issues, moving out of silos, restoring recruitment and demographics, reviewing previous responses, identifying gaps, pandemic related issues and evaluation of success with respect to the latest Public Comment on the topic.</i>
2020/07/31	Comment: Final Report of the Cross Community Working Group (CCWG) on new gTLD Auction Proceeds	<i>The ALAC appointed five Members to the CCWG and these Members, alongside several participants from At-Large, were very active contributors to the work of the CCWG. The ALAC believes that all of its concerns have been addressed and therefore was pleased to accept and ratify the Final Report of the new gTLD Auction Proceeds Cross Community Working Group.</i>
2020/07/31	Comment: Third Accountability and Transparency Review Team (ATRT3) Final Report	<i>The ALAC strongly supports the limited and focused number of recommendations proposed by the ATRT3 report, reflecting the pending implementation of proposals from previous review teams. In moving forward, the ALAC advises the ICANN Board to: (1) Swiftly implement ATRT3 recommendation to evolve both specific and organizational reviews as per Section 8 of the final report; (2) Fully endorse the recommendation to enhance current methods of Prioritization and Rationalization of Activities, Policies, and Recommendations (as per Section 10 of the report); (3) Share the ATRT3 Review Team's approach to the review process and methodology behind it, aiming to ensure that all elements contributing to achieving strategic objectives and their subcomponents are Specific, Measurable, Achievable, Relevant and Time-based (SMART) and that all reporting on these refers to well specified metrics, to be reviewed on a regular or timely basis (as per Section 9 of the report).</i>
2020/07/29	Comment: ALAC Statement on EPDP (July 2020)	<p><i>A vast amount of work has been done, but the ALAC believes that if and when the SSAD is deployed, the probability of its meeting the goals needed by the communities whose efforts we support will be low. Therefore, in order for the ALAC to support the EPDP Final Report, the ALAC noted the following GNSO Council outcomes would be required:</i></p> <ol style="list-style-type: none"> <i>1. GNSO Council would agree that any Evolution Standing Committee recommendation on additional SSAD decision use-cases (that are in full accordance with the EPDP Policy Recommendation 9.3) will be treated as Implementation and not require further policy deliberations.</i> <i>2. Legal vs Natural, Accuracy, WHOIS Accuracy Reporting System and Anonymized contact email will be fully addressed with full participation in all aspects of discussions by the ICANN Advisory Committees that wish to participate. If these issues are deemed to be policy, they must be addressed by a group empowered to make policy recommendations, led by a qualified, non-conflicted chair. The GAC, ALAC and SSAC must be involved in setting the mandate or charter of such groups. The target for completion of all work should be no later than April 2021.</i> <i>3. The GNSO Council would agree that ratifying the Evolution Standing Committee recommendations will only require a GNSO Majority as currently called for in the GNSO Policy Manual.</i> <i>4. The GNSO Council would acknowledge that deliberations during implementation setting of prices for the SSAD must involve the future potential users of the SSAD and not only look at cost recovery but the actual ability and willingness of SSAD users to pay the prices being set.</i>

2020/07/14	LACRALO Comment: Latin America and Caribbean (LAC) Regional Strategic Plan for FY2021-2025	<p>The LACRALO statement was in response to the ICANN Latin America and Caribbean (LAC) Regional Strategic Plan for FY2021-2025. As all LACRALO countries fall under the LAC Regional Plan, a diverse drafting team from the region provided feedback on strategy topics such as security, ICANN governance, unique identifiers system, geopolitics, and financials.</p> <p>Note: Ratified by the LACRALO Leadership Team and the ALAC.</p>
2020/07/09	Comment: ccNSO PDP3: Initial Proposals for Process to Retire ccTLDs	<p>As a whole, the ALAC supports the ccNSO PDP3. From an end user perspective, the ALAC suggested two points to be considered: 1) As a user of the Internet, the removal of a TLD will mean less likelihood for confusion as usually a ccTLD would be removed to make way for a new one. This enhances Trust in the domain name identifiers; 2) As a domain name registrant, the retirement of the ccTLD could pose a problem when correspondents are accustomed to use the "old" address using the obsolete ccTLD. Some companies have built a brand around the "old" ccTLD.</p>
2020/06/17	Comment: Name Collision Analysis Project (NCAP) Study 1: Proposed Final Report	<p>The ALAC strongly supports the SSAC in proceeding with Studies 2 and 3, and it also strongly urges the ICANN Board and ICANN Org/OCTO to take the necessary action to facilitate the conduct and funding of the NCAP Studies 2 and 3 in a manner agreeable by the SSAC.</p>
2020/06/01	Comment: Draft PTI FY21-24 Strategic Plan	<p>The ALAC supports the five strategic objectives of the Draft PTI Strategic Plan, and strategies to achieve those objectives. The ALAC particularly supported the following elements: Awareness of PTI's mandate and remit, alignment of ICANN and PTI's Strategic and Financial Plans, and input into the development of ICANN policies.</p>
2020/05/27	AFRALO Comment : ICANN Africa Regional Plan for Fiscal Years 2021-2025	<p>The AFRALO statement was in response to the ICANN Africa Regional Plan for Fiscal Years 2021-2025. As all AFRALO countries fall under the Africa Regional Plan, a drafting team from the region provided feedback on strategy topics such as security, ICANN governance, unique identifiers system, geopolitics, and financials.</p> <p>Note: Ratified by the AFRALO Leadership Team and the ALAC.</p>
2020/05/05	Comment: Addendum to the Initial Report of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Team – Phase 2	<p>The ALAC commented on the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Team – Phase 2, via a comprehensive Public Comment Google form. The ALAC provided feedback on related issues such as display of information, legal versus natural persons, privacy, et al. For all recommendations not listed in the ALAC statement, the ALAC noted that they they "Support as written".</p>
2020/05/04	Comment: Phase 1 Initial Report of the Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process	<p>The ALAC commented on the Phase 1 Initial Report, via a comprehensive Public Comment Google form. The ALAC provided feedback on related issues such as URS recommendations, TMCH preliminary recommendations, sunrise recommendations, et al.</p>
2020/04/13	Comment: Revised Community Travel Support Guidelines	<p>The ALAC noted that At-Large is unique within the ICANN community in that virtually all volunteers in At-Large activities, including those involving travel, do so as true volunteers. Without ICANN travel support, the number of active At-Large participants at ICANN meetings would be few in number. The ALAC specifically commented on wire transfer and foreign exchange fees/losses, visa reimbursement, travel insurance, ICANN arranged travel, room guarantees, forced overnight delays, early check-in and late check-out, as they pertain to the successful participation of the community during ICANN meetings.</p>
2020/04/03	AFRALO-APRALO Comment: Middle East and Adjoining Countries (MEAC) Strategy 2021-2025	<p>The AFRALO and APRALO joint statement was the first joint RALO statement within the At-Large Community, in response to the ICANN MEAC Strategy 2021-2025. The countries that fall under the MEAC Strategy within AFRALO and APRALO provided feedback on strategy topics as security, ICANN's governance, unique identifier systems, and geopolitics.</p> <p>Note: Ratified by the AFRALO & APRALO Leadership Teams and the ALAC.</p>
2020/03/31	Comment: Draft Proposal for NextGen@ICANN Program Improvements	<p>The ALAC suggested several significant recommendations to the NextGen@ICANN Program, to the benefit of the community by opening the program and ensuring a welcoming environment to all NextGeners, including first time participants. The ALAC's recommendations would ensure that participants are selected with a stronger focus on their work and can then attend more than one meeting to engage with the community and find their "policy home". As a part of its recommendations, the ALAC stated that At-Large would welcome a more active participation of NextGeners in its community.</p>
2020/03/31	Comment: Name Collision Analysis Project (NCAP) Study 1	<p>The ALAC acknowledged the report as a useful primer on the subject of Name Collisions. The ALAC noted that they look forward to further deliberation by the relevant groups and their onward action with respect to the third goal of Study 1, which is to determine if the NCAP Project will proceed onto a Study 2.</p>

2020/03/23	Comment: Initial Report of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Team – PHASE 2	<i>For all recommendations not listed in the ALAC statement, the ALAC noted that they they “Support as written”. The ALAC “supported wording with change” for several other recommendations - 1, 6, 7, 9, 15, 19 - and made a general comment that differentiation between natural and legal persons would offload the system from unnecessary queries that are permissible under GDPR.</i>
2020/03/20	Comment: Second Security, Stability, and Resiliency (SSR2) Review Team Draft Report	<p><i>The ALAC noted that ensuring the security, stability and resiliency of the DNS is arguably ICANN's single most important role. The ALAC has a particular interest in the recommendations related to DNS Abuse, and notes that several of the recommendations overlap with and complement those issued by the RDS WHOIS2-RT and the CCT RT. DNS Security, stability and resiliency is not something that we can afford to ignore.</i></p> <p><i>The ALAC has a particular focus on and interest in DNS Abuse. To address this may require contractual changes to facilitate Contractual Compliance action. Such changes require either negotiations with the contracted parties or a PDP, and the ALAC recommends against a PDP and instead encourages ICANN to come to an agreement with contracted parties. Known vulnerabilities need to be corrected with the utmost haste.</i></p>
2020/03/13	Comment: ALAC Feedback to PIR Public Comment Proceeding	<p>Note: Not an ICANN Public Comment. The Public Interest Registry (PIR) held a Public Comment proceeding on the issue of the ISOC/PIR. (8) responses were submitted on behalf the ALAC to the PIR Public Comment proceeding.</p> <p><i>The ALAC made several suggestions to PIR regarding the issue of ISOC/PIR. The ALAC noted that PICs are the best mechanism with which to enshrine the essential characteristics of a .ORG registry, yet there are significant issues with PIC enforcement that need to be addressed for PICs to be considered a trustworthy assurance. They noted that from the standpoint of an "individual end user," a 10 annual price cap would add a lot of predictability. The ALAC also noted that the stewardship council for .ORG is a good start, but its mandate should be wider than just free speech and privacy, and suggested a few board seats reserved for 501c(3) organizations, chosen by the community, would be more powerful. Reserving certain seats to be selected by NPOC and perhaps the ALAC (to represent the individual registrants) would help a great deal.</i></p> <p><i>The ALAC's objective is to enshrine PIR's best practices in its contract with ICANN such that they survive any further transitions of ownership.</i></p>
2020/02/25	Comment: Draft FY21-25 Operating & Financial Plan and Draft FY21 Operating Plan & Budget	<p><i>The ALAC congratulated the ICANN Finance and Planning team, as the draft plans and budget have shown great improvement over the past few years. Not only in how the information is provided, but in the way the plans and budget are structured. The ALAC made several suggestions with regards to the Operating & Financial Plan and Budget, emphasizing that there is not an exact correlation between the number of domains and the income of ICANN. This is important because ICANN relies upon the number of contracted registries and registrars and the number of domains a gTLD has.</i></p> <p><i>The ALAC drafted a separate response to Appendix C, relating to the Evolution of the Multistakeholder Model, following their statement. The At-Large community registered its surprise and disappointment at seeing this important subject, which has been such a major topic of discussion, now relegated to an appendix in this Public Comment - in which it is unlikely to get the time and attention it deserves from the ICANN community.</i></p>
2020/02/13	Comment: Proposed Final Report of the New gTLD Auction Proceeds Cross Community Working Group	<p><i>While several Members of the ALAC Auction Proceeds team originally preferred Mechanism B - where ICANN worked with a non-profit organization already adept in the evaluation, selection and the allocation and distribution of grant funds - ALAC consensus was arrive at for Mechanism A. (Mechanism A allows outsourcing if viewed as advantageous, and in fact ICANN often outsources parts of its responsibilities which are not core to overseeing its Bylaw-mandated responsibilities. Thus Mechanism A could end up being comparable to Mechanism B, but provided more management flexibility in deciding how the varying aspects of the project would be carried out).</i></p> <p><i>The ALAC notes that presumption of the independent panel, with no connection to or control by either ICANN Org or the ICANN Board (preferably contracted to a suitable non-profit or a set of experts in the field of grant selection and allocation) is a critical part of this decision and the ALAC would strongly object and withdraw its support if that condition changes.</i></p>
2020/02/13	Comment: "At-Large Valentine" submitted to the ICANN Board regarding Proposed Amendment 3 to the .COM Registry Agreement	<p><i>An “At-Large Valentine”, regarding the Proposed Amendment 3 to the .COM Registry Agreement, written in good faith and good humor, was submitted to the ICANN Board on 13 February 2020. Jonathan Zuck, ALAC Vice Chair for Policy and CPWG Co-Chair, drafted the letter on behalf of At-Large. ALAC Members and At-Large community members reviewed and approved the letter during the CPWG meeting on Wednesday, 12 February 2020.</i></p> <p><i>The ALAC welcomed the LOI between Verisign and ICANN as a commitment to expand efforts to identify and promulgate best practices by contracted parties to mitigate DNS Abuse. While there are many whose efforts exceed those of others, the At-Large Community believes that even more can be done both in terms of best practices and in terms of bringing along those whose practices are not the best.</i></p>

2020/02/11	Comment: Proposed Dates for ICANN Public Meetings 2024-2028 and Revised Dates in 2022	<p>The ALAC noted that ICANN has been striving to be more inclusive in an effort to engage more volunteers with diverse backgrounds. ICANN acknowledges the difficulty in getting new people to join and engage within ICANN and to increase the diversity of participants. The Multistakeholder Model Work Plan takes note of the importance to ICANN to develop pathways to enable effective participation. One of the more practical ways for ICANN to facilitate participation is for ICANN Org, to be more aware of and to avoid clashing with important holidays and religious days observed by volunteers who work countless hours to improve ICANN's multistakeholder advisory work. By avoiding these dates as much as possible it is showing all volunteers that ICANN Org understands their concerns and does its best to avoid conflicts.</p> <p>The ALAC made several other suggestions regarding ICANN meeting dates in 2022 and from 2024-2028.</p>
2020/01/31	Comment: Third Accountability and Transparency Review Team (ATRT3) Draft Report	<p>The ALAC noted the ATRT review has produced a considerable amount of work in little time and this is laudable. Nevertheless, from an end-user perspective, ATRT should consider deliberating the following questions: (1) How can ICANN better address conflicts of interest? The ICANN community is relatively small, with relatively few actors involved in the process. Conflicts of interest, perceived or real, can impact negatively on ICANN's standing; (2) How can transparency be increased? (3) How can ICANN ensure that in cases where issues persist, processes are initiated to correct trajectory? (For example, if multiple reviews identify the same issue or if they find implementation to be lacking, how can this be fast-tracked transparently and effectively?) (4) Might it be necessary to "silo off" or ring-fence certain functions, including reviews, compliance, and other types of community oversight? (5) How can ICANN improve their responsiveness to community and review team questions and affairs, and what policies should be created to ensure these are dealt with? The ALAC also suggested taking several noted options into consideration, emphasizing from an end user perspective, more, not less, accountability and transparency is required from the ICANN community and org.</p> <p>Overall, the ALAC supports the suggested changes to the ICANN Public Comment, public input as well as the accountability indicators. We believe those changes would make the Public Comments more effective and show better transparency. We strongly believe that a wide, open and inclusive process should be maintained in policy development process especially with input representing the multistakeholder environment. Policy development must be transparent, efficient and should not be biased or skewed towards a group.</p>
2020/01/31	Advice: ALAC Advice to the ICANN Board on ISOC/PIR Issue	<p>The ALAC noted the proposed sale of PIR to Ethos Capital has, understandably, created quite a stir, prompting commentary from many perspectives within the ICANN community, and applauds the efforts by the ICANN Board to clarify and make transparent, as much as possible, the process regarding the deal and to take the time to encourage the best possible result.</p> <p>The ALAC Advice to the ICANN Board suggested (8) recommendations: (1) The Registry for .ORG must be organized as either a charitable non-profit [501c(3) in the US] or a "Benefit Corporation" (B Corporation); (2) One-third of the Registry Corporate Board must be representatives of charitable nonprofits; (3) One Board member selected by the ALAC; (4) The Registry for .ORG must enshrine in its bylaws that the principal focus of the domain is nonprofits and individuals and not commercial interests; (5) The Registry must enshrine in its bylaws a commitment to free speech and a resistance to takedown demands with a political basis; (6) The Registry must provide 6 months prior written notice to its registrants of any increase in wholesale price of their domain names registration renewal fees and the option of a 20-year renewal thereof at the pre-increase price; (7) The Registry Agreement must enshrine PIR prohibited practices such as bulk sales to commercial registrars; and (8) The Registry Agreement must establish a "DNS Abuse Ceiling".</p>
2019/12/24	Advice: ALAC Advice to the ICANN Board on DNS Abuse	<p>Background</p> <p>Prior to ICANN66, At-Large and other community groups within ICANN identified the issue, released several reports on the topic of DNS Abuse. In advance of ICANN66, At-Large Consolidated Policy Working Group (CPWG) led by Co-Chairs Jonathan Zuck and Olivier Crépin-Leblond discussed recent DNS Abuse research and how DNS Abuse impacts the Internet end user community, including the erosion of trust and security. During ICANN66, At-Large organized a policy session on "DNS Abuse – End User Concerns", with a panel presentation. Jonathan Zuck and Joanna Kulesza, ALAC Member, moderated the session and summarized how At-Large can enhance Internet end user protection against DNS Abuse. The ALAC drafted ALAC Advice on the topic during ICANN66, and finalized the draft in subsequent CPWG meetings. The ALAC Advice on DNS Abuse was submitted to the ICANN Board on 24 December 2019.</p> <p>ALAC Advice</p> <p>The ALAC made a series of (8) recommendations to the ICANN Board. The ALAC emphasized that community dialogue cannot delay or defer ICANN's commitments or operations related to DNS Abuse. Their recommendations speak to the insufficiency of the status quo, and stressed their recommendations that no new round will be approved without substantial changes in the area of DNS Abuse. Please read the full advice here.</p>
2019/12/12	Comment: Implementation Plan for the GNSO Consensus Policy Relating to the Protection of Certain Red Cross Names	<p>As a worldwide internationally recognized humanitarian aid organization, and one that has been regularly the target of those seeking to fraudulently extract donations, the ALAC believes that the International Federation of Red Cross and Red Crescent Societies (incorporating National Red Cross or Red Crescent Societies, and the International Committee of the Red Cross) should be given the benefit of protection to its various identifiers, designations and/or acronyms as intended by the policy changes proposed for implementation in the said updated consensus policy. This includes the proposed action to recognize changes to the official names of the Red Cross Society entities, including component names, in Eswatini and Macedonia, respectively, an action we view as necessary.</p>

2019/12/09	Comment: Registrar Directory Service (RDS-WHOIS2) Review Team Final Report	<p>The ALAC finds the report to include very useful information that should be used to guide the development of relevant policies, and appreciates the team's effort and supports the provided recommendations.</p> <p>The ALAC highlights the importance of the recommendations related to the accuracy of data, and it strongly advises its acceptance by the ICANN Board. In light of the GDPR, the ALAC noted the importance of several other recommendations in the WHOIS Report encouraging a more proactive position of contractual compliance, especially in regards to DNS Abuse, as well as the team's findings with regard to law enforcement needs.</p>
2019/11/27	Comment: DRAFT PTI and IANA FY21 Operating Plan and Budgets	<p>The ALAC noted that the proposed PTI and IANA FY21 Operating Plan and Budgets are aligned with the ICANN Strategic Plan, and are also very similar to previous years' budgets. An adjustment in the PTI budget is noticeable, including adjustments in salaries, services and other administrative cross-charges from ICANN to PTI or IANA.</p> <p>However, the ALAC pointed out that a change is in process in the Governance of the Root Server System, these changes are not reflected in the proposed PTI and IANA FY21 Operating Plan and Budgets. The ALAC asked several exploratory questions in their response.</p>
2019/10/14	Comment: Next Steps to Improve the Effectiveness of ICANN's Multistakeholder Model	<p>The ALAC summarized its comments as follows:</p> <p><u>I. Strengthen ICANN's bottom-up multistakeholder decision-making process and ensure that work gets done and policies are developed in an effective and timely manner.</u></p> <p>Issue 1: Prioritization of work. ALAC feels this must be addressed (Category A). Some suggestions include: spreading the workload, increased outreach (ATLAS III, further incentives to keep contributing volunteers, adequate knowledge and resources (specified in II) The entire community, as well as ICANN.org must contribute to the resolution of this problem.</p> <p>Issue 2: Precision in scoping the work. This issue may fall into Category A - must be addressed - or Category B -- might be partially addressed in current processes. We foresee scoping that is tight and smart and relevant to the process. It is impossible to say who should be responsible when so much activity around it is unresolved.</p> <p>Issue 3: Efficient use of resources. This is a category A issue which must be addressed. We recognize that it might be partially addressed by current processes but cannot assess the situation until these processes are completed. We are concerned that PDP 3.0 may offer efficiency at the cost of inclusiveness which we feel would be a backwards step in the evolution of ICANN's MSM.</p> <p>Issue 4: Roles and responsibilities and a holistic view of ICANN. This is a category A issue although it will require further processes to resolve. ALAC seeks a bottom-up review of roles and responsibilities as an independent process.</p> <p><u>II. Support and grow active, informed and effective stakeholder participation.</u></p> <p>Strategies to expand the concept of participation are offered as well as various resources and support needed to ensure informed participation. We consider this to be a Category A issue -- the model cannot evolve if it is not addressed. This is a major concern for At Large and other volunteer-based constituencies and all will need to be involved in addressing it. Support from ICANN.org and the Board will be necessary.</p> <p>Issue 5: Representativeness and inclusiveness. Mentorship programs are a key part of ensuring that the MSM system remains representative and inclusive. Relevant constituencies as well as staff need to make sure these programs are working as they are intended and that they are reaching the right demographics. Inclusiveness at the leadership level needs to be improved through a bottom up process with staff assistance.</p> <p><u>III. Sustain and improve openness, inclusivity, accountability and transparency.</u></p> <p>Issue 6: Culture, trust and silos. This is a category A issue that needs to be addressed in this process. All constituencies need to reach across their boundaries, respect for other viewpoints must be reinforced. This is a problem in many large organizations and there are professional services available to help build trust and cooperation. By engaging some of these services, ICANN.org could help constituencies build a better working environment.</p> <p>Issue 7: Complexity. This is an inherent feature of ICANN work, but where it can be alleviated, ICANN.org should take the lead. Make sure information such as the website is well organized and understandable and closely monitor the internet governance environment for issues that will impact ICANN directly.</p> <p>Issue 8: Consensus. Creating conditions that would facilitate consensus is the goal of the issues already listed. Preserving the voice of end users in the decision-making processes is crucial to ICANN's MSM model -- a Category A issue in which all parties play a role but the role of the Board will be particularly important.</p>

2019/08/12	Comment: Proposed Definition of Name Collisions and Scope of Inquiry for the Name Collisions Analysis Project	<p>The ALAC considers the issue of Name Collision in the DNS an area of importance for the minimization of unintended consequences for Internet end users. The ALAC appreciates the need to have a Name Collision definition for purposes of scoping the inquiry for the Name Collision Analysis Project (NCAP), in order for the NCAP Study One to be manageable and on point, and therefore supports the Proposed Definition of Name Collision and Scope of Inquiry for the Name Collision Analysis Project of 1 July 2019. Of particular importance to us are:</p> <p>(1) The recognition and inclusion of Type B situations (ie. B. In scope but not intended to be the subject of data studies) which provides built-in peripheral consideration of such situations with decision for examination through data analysis at a later stage if a compelling case were to arise within Study One; and</p> <p>(2) The possibility of amending the Definition of Name Collision and Scope of Inquiry for the Name Collision Analysis Project should further pertinent information come to light at a later stage either through the ongoing work of the NCAP DG, NCAP Working Party and/or input obtained from the party/ies eventually contracted to undertake NCAP Study One.</p>
2019/08/09	Comment: Evolving the Governance of the Root Server System	<p>The ALAC strongly supports the overall proposal and appreciates the opportunity to comment. The RSS, according to RRSAC37, needs to evolve so it remains a reliable, resilient, and sustainable service in the face of increasing traffic and cyberattacks. However, the ALAC finds it difficult to accept that ICANN is not considered a primary stakeholder with regard to the RSS, given that the Domain Name System and its reliable and trusted operation is a prime reason for ICANN's existence. The ALAC also encourages that Internet users, the ultimate user and beneficiary of the DNS, should be listed as having a stake in the existence and evolution of the RSS.</p> <p>The financial model is also of some concern to the ALAC. No figures are provided to allow even order-of-magnitude estimates. It is surely time that we begin to understand exactly what level of funding will be required and hypothesize on where such funding will come from.</p>
2019/08/05	Comment: Draft Financial Assumptions & Projections and Operating Initiatives for the development of Fiscal Years 2021-2025 Operating & Financial Plan	<p>The ALAC considered the Draft Financial Assumptions, Projections and Operating Initiatives, and offered comments on the following topics among others:</p> <ul style="list-style-type: none"> • The ALAC is not optimistic that Financial Assumptions A (Roll-out of New gTLDs) and B (New Business Models – Geographic gTLDs and Brand gTLDs) will be highly successful vehicles to new revenue. Although the first round of new gTLDs did bring in considerable revenue, the ALAC notes that these earlier rounds represented the “low hanging fruit” in the new gTLD market. • The ALAC agrees that ICANN continue to put money towards the an urgent need to resolve current challenges around Universal Acceptance, as well as the primary strategic goal of security, stability and trust. • The ALAC agrees that work which needs to be done on evolving the multistakeholder system is substantial and complex and that it must be ongoing with adequate resources directed towards its completion. The objectives related to diverse and inclusive participation in policy making in an efficient and effective way are essential to improving the system, underlining that face-to-face meetings are essential to the functioning of the multistakeholder model. • The ALAC/At-Large community propose some clarity via a listing of priorities and statements on the impact of each project on ICANN org and on each of the unique ACs and SOs. The community believes that while policy development and implementation activities are integral to the planning process, so are other activities, such as those that enable communication, collaboration, and outreach, between RALOS, At-Large members and other constituencies.
2019/07/26	Comment: Proposed IANA SLAs for Publishing LGRs /IDN Tables	<p>The ALAC supports the recommendations of the CSC and PTI for the proposed IANA SLAs for publishing the LGRs/IDN Tables.</p>
2019/07/26	Comment: Fundamental Bylaws Amendment Proposal – IANA Naming Function Review	<p>The ALAC supported the current version of the ICANN Bylaws Section 18.7(a) and 18.7(b), but understands that it has now proven to be difficult to implement. The ALAC agrees that the proposed change preserves the intent of the original Fundamental Bylaw and supports the change. Subject to any new information being brought to the ALAC's attention, the current intention is that the ALAC will support this Fundamental Bylaw change when it is presented to the Empowered Community.</p>
2019/06/13	Comment: Evolving ICANN's Multistakeholder Model	<p>The ALAC contribution to the evolving multistakeholder model condensed the 21 issues developed through community consultations into 4 general categories: (1) structural, (2) process, (3) participation and (4) intergroup relations. Regarding structure and process, the ALAC recommends more specific scoping, the use of external influences and project management tools, easily retrievable records of discussions and decisions and joint community/staff priority setting. Regarding participation, the ALAC noted the multistakeholder system depends on wide participation in the process and wide participation from all regions remains a challenge, including language barriers and volunteer burnout. Finally regarding intergroup relations, the ALAC noted there will always be disagreements, but a culture of positive relations between and among groups must be actively encouraged.</p>
2019/05/07	Comment: Proposed Renewal of .asia Registry Agreement	<p>The ALAC supports the proposed changes to the .asia (DotAsia) renewal agreement, with (3) comments related to universal acceptance (UA), public interest commitments and fees to be paid to ICANN org.</p>

2019/05/02	Comment: ALAC Statement on Registry Agreement Renewals .org, .biz and .info	<p>The ALAC generally refrained from commenting on these prior proposed Registry Agreement renewals, with the exception of the proposed renewal of the .NET Registry Agreement in 2017. The ALAC in general favors standardizing Registry Agreements as this allows for transparency and predictability, as well as ease of review and compliance monitoring of one standard contract (with necessary but controlled variations through Addendums) instead of managing many disparate/varying contracts. Being supportive of this approach, the ALAC has not objected to the base Registry Agreement, or to its use in prior renewals.</p> <p>In respect of the intent to standardize the said 3 proposed Registry Agreement renewals (.org, .biz, .info), the ALAC welcomes the following proposals:</p> <ul style="list-style-type: none"> (i) inclusion of Public Interest Commitments (per Specification 11), (ii) inclusion of Minimum requirements for Rights Protection Mechanisms (per Specification 7), (iii) adoption of the Registry Code of Conduct (per Specification 9), and (iv) amendment of the relevant section in Specification 5 to govern the allocation of two-character labels at the second level to avoid confusion with corresponding country codes. <p>The ALAC also noted there are differences in opinion within At-Large regarding the omission and quantum of price caps.</p>
2019/04/17	Advice (sent to ICANN Board): GN SO Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Policy Recommendations for ICANN Board Consideration	<p>The ALAC provided advice to the ICANN Board, noting significant concern related to three aspects of the EPDP Report. Specifically, the ALAC is concerned not only with the outcomes, but with the process that was followed to address the issues. All three impact the ability to access registration data and the completeness of that data, specifically: "to identify the appropriate balance for a path forward to ensure compliance with the GDPR while maintaining the existing WHOIS system to the greatest extent possible". The ALAC advises the ICANN Board to:</p> <ul style="list-style-type: none"> • Request that the issue of Thick WHOIS be discussed during the EPDP Phase 2 in light of the new legal opinion; • Request that the issue of geographic differentiation be re-opened during the EPDP Phase 2 in light of the new legal opinion and the lack of considering the competing needs of privacy vs the benefits of non-redaction on cyber-security activities and that the ensuing discussion factor in the needs of those using the data for cyber-security and other legitimate purposes; • Request that the issue of legal/natural differentiation be discussed during the EPDP Phase 2 explicitly considering the competing needs of those using the data for cybersecurity and other legitimate purposes; • Initiate independent studies related to the implementation of geographic and legal/natural differentiation as well as the impact of the Temporary Specification implementation on cyber-security, or request that the EPDP Phase 2 commission such studies. If the latter, the Board should ensure adequate funding for such work.
2019/03/13	Comment (sent to ICANN Board): ICA NN64 Joint GAC-ALAC Statement on EPDP	<p>During ICANN64, the At-Large Advisory Committee (ALAC) and Governmental Advisory Committee (GAC) drafted and approved a Joint GAC-ALAC Statement on the EPDP. The GAC and ALAC are aligned overall with the EPDP Phase I Report, as it pertains to outstanding concerns as articulated in their respective statements to the report. The two advisory committees are in agreement on the need to distinguish between natural and legal persons. In addition, the GAC and ALAC highlighted the importance of data accuracy, the technical contact field, and protecting the public interest. The statement was drafted jointly with the GAC with input from the ALAC Liaison to the GAC, Yrjö Lansipuro, and GAC representative, Cathrin Bauer-Bulst, as well as the At-Large representatives to the EPDP, Hadia Elminiawi and Alan Greenberg.</p>
2019/02/20	Comment: Updated Operating Standards for Specific Reviews	<p>It is the view of the ALAC that the level of specificity for specific reviews is necessary to prevent misunderstandings and missteps by any of the parties involved in the review. The ALAC believes scope should be well defined within the confines of bylaws and review teams should be free to pursue their mandate within that scope. Accordingly, the ALAC voiced their strong support for the updates to the Operating Standards for Specific Reviews.</p>
2019/02/20	Comment: First Consultation on a 2-Year Planning Process	<p>The ALAC/At-Large community agrees that more time should be given for additional community involvement, and requests that ICANN Org provide a listing of priorities and statements on the impact of each project within ICANN Org and on each of the unique ACs and SOs. The ALAC also encourages ICANN Org to provide the appropriate level of resources to ICANN IT for continued support of services which are vital for community policy work. The ALAC believes that the additional time from 15 months to 2 years would provide more transparency as the community becomes more aware of priority ranking of projects or has collaborated with ICANN Org on priority ranking. The At-Large Advisory Committee believes that beyond the priorities of keeping the Internet secure and stable, and maintaining the multistakeholder model, the community should be directly involved in setting other priorities. In addition to policy activity, the ALAC emphasizes that outreach and engagement are integral to the planning cycle, and the benefit of CCWGs and CCEGs in planning activities. The ALAC supports a formalized, dedicated planning phase to plan for SO/AC activities. The ALAC noted it strongly believes that for ICANN to be as inclusive as possible, documents should be translated into multiple languages; important community meetings should be held in different time zones and in different languages, with real time translation (language channels) and captioning / real time transcription (RTT) provided on all calls. Finally, the ALAC strongly believes that for ICANN to be seen to be truly multistakeholder-focused and inclusive, then appropriate resources must be made available to remove barriers that might prevent the full participation of the ICANN community in policy activities.</p>

2019/02/11	Comment: ICANN Strategic Plan for Fiscal Years 2021 – 2025	<i>The ALAC stressed the importance of ICANN's role in the multistakeholder model of Internet Governance (including 6 recommendations to improve its effectiveness), suggested a rebalancing of representation on the ICANN Board to enhance the Internet end user perspective, and noted that more fulsome cost/benefit analyses of programs like the gTLD expansion should be available in order predict the future impact on total resources. The ALAC also commented on strengthening the security of the Domain Name System (DNS) and the DNS Root Server System, evolving the unique identifier systems to continue to serve the needs of the global Internet user base, addressing geopolitical issues impacting ICANN's mission to ensure a single and globally interoperable Internet, and ensuring ICANN's long-term financial sustainability.</i>
2019/02/08	1st Comment: ICA NN Draft FY20 Operating Plan and Budget and Five-Year Operating Plan Update	<i>Of principle concern to the ALAC/At-Large is their ability to achieve the objectives of the At-Large Review Implementation Plan. The comments in the statement relate to particular portfolio or project areas and incorporate specific At-Large concerns, namely: language services, raising stakeholder awareness of ICANN worldwide, engage stakeholders regionally, support policy development, policy related and advisory activities, reinforce stakeholder effectiveness, collaboration and communication capabilities, coordination of ICANN participation in Internet Governance, supporting organizational reviews, and supporting stakeholder participation.</i>
	2nd Comment: ICA NN Draft FY20 Operating Plan and Budget and Five-Year Operating Plan Update	<i>The ALAC Chair determined to submit an additional ALAC statement on this public comment, in accordance with new rules regarding FY20 Additional Budget Requests (ABRs). As ABRs are no longer intended to request travel support to ICANN meetings, the ALAC decided to submit an additional comment to the FY20 Budget public comment, requesting two travel slots to support the attendance of active At-Large policy/outreach leaders in At-Large work session activities at ICANN meetings.</i>
2019/01/22	Comment: Work Track 5 on Geographic Names at the Top Level - Supplemental Initial Report of the New gTLD Subsequent Procedures Policy Development Process	<i>The ALAC notes that there has yet to be a discussion about whether any new gTLDs are needed. In case of an expansion, first and foremost, (1) strings with geographic connotations should not present harm (eg. risk for confusion) to end-users and (2) end-users, as residents of a given geographic entity, should have a say, through their governments or public authorities, in how its name is used. The ALAC prefers preventative protection mechanisms for country, territory, sub-national place and capital names. In the case of non-capital city names, there is a balanced support within the ALAC for either (1) requiring support or a non-objection letter from the relevant authority only if the applicant intends to use the TLD primarily for purposes associated with the city or (2) requiring support or a non-objection letter in any case. As to the 2012 AGB, ALAC thinks that its final version generally worked well and supports, in general, its treatment of geographic names.</i>
2019/01/04	Comment: Application for New Uniform Domain Name Dispute Resolution Policy (UDRP) Dispute-Resolution Service Provider	<i>The ALAC strongly supports the proposal for a new UDRP Dispute Resolution Provider, viewing it beneficial to the interests of all Internet end users, particularly to domain name registrants.</i>
2018/12/21	Comment: Initial Report of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Team	<i>The ALAC submitted a Word Doc form mirroring the new Google Form requested by the EPDP Team for collection of this public comment. In its statement, the ALAC provided its answers on the questions posed by the EPDP Team. In particular, the ALAC made recommendations on additional purposes for processing registration data, including the Accuracy Reporting System (ARS) and research and threats analysis/prevention from the Office of the Chief Technology Officer (OCTO). Regarding data elements, the ALAC noted Registrant provided data must not be unilaterally removed without due consultation with the data provider, and the registrant must declare whether it is a natural or legal person. The ALAC noted the technical contact fields must be mandatory, and the Organization field should not be redacted. The ALAC also noted in its conclusion the SSAC revised version of SAC101, a paper previously supported by ALAC, drawing particular attention to the statement, "RDDS access must comply with the law, but access should not be less timely, more restricted and less public than law requires."</i>
2018/12/21	Comment: Supplemental Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4)	<i>The ALAC put on record their responses, suggestions and in some cases, advocacy, to the preliminary recommendations, options and questions in the Report. In particular, the ALAC strongly opposes the retention of the regular highest-bid auction process which was used in the 2012 round ("regular auctions") as the mechanism of last resort for resolution of contention sets within the Program, proposing instead that the ICANN Community explore the introduction of a multiplier-enhanced Vickrey auction, while supporting ways to increase avenues for voluntary resolutions of contention sets in order to avoid auctions. The ALAC also notably does not support a total ban of all forms of private resolutions, but are strongly in favor of disallowing forms of private resolutions which result in a 'losing' applicant gaining or being promised a financial benefit in return for withdrawing their application in a contention set, including and especially private auctions.</i>
2018/12/14	Comment: Proposed Consensus Policy on Protections for Certain Red Cross and Red Crescent Names in All Generic Top-Level Domains	<i>The ALAC continues to take the position that as a humanitarian organization, and one that has been regularly the target of those seeking to fraudulently attract donations, the Red Cross should be afforded the courtesy of having its various identifiers protected at the second level in gTLD domain names. The ALAC cited its June 2018 statement of support for the Initial Report on the Protections for Certain Red Cross Names in all gTLDs – Policy Amendment Process, and affirmed support for the Reconvened WG's recommendations on proposed amendments.</i>

2018/12/11	Comment: Competition, Consumer Trust, and Consumer Choice Review Team (CCT) Final Report & Recommendations	<i>As the principal voice of Internet end users within the ICANN community, the ALAC were interested in the findings and recommendations from the CCT Review, particularly in the areas of Choice and Trust. The ALAC is supportive of all of the recommendations in the Report, including the new ones relating to DNS abuse in New gTLDs. The ALAC reiterated they 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 ALAC commented on additional sections of the Report and Recommendations, including Recommendations 1, 8-10, 11-13, 14-25, 29-31, 32, 33 and 34-35.</i>
2018/12/11	Comment: Initial Report of the New gTLD Auction Proceeds Cross-Community Working Group	<i>The ALAC have been following this issue closely, and discussed the issues internally prior to the issuance of the Initial Report. The ALAC discussed each of these mechanisms among the participants and members of the working group, and in their statement commented on Recommendations 1-10, noting it believes strongly that At-Large Structures (ALSes) and Individual members should be able to apply for funds; the proceeds from past auctions were intended for use in capacity building activities enhancing the mission of ICANN and consistent with one of its core principles for an "open and interoperable Internet", for the benefit of the Internet community.</i>
2018/12/03	Comment: Draft Final Report of the Security and Stability Advisory Committee Review (SSAC2)	<i>The ALAC is in support of the SSAC's continued role in the ICANN community as an Advisory Committee. It commented specifically on Recommendations 1-5, 8, 10, 12, 14, 16-17, 21-22, 24 and 25 in the Report, noting that the SSAC should, in addition to revising its advice to the Board, also simultaneously attempt to write advice in such a way that non-technical experts in the ICANN community more easily understand them.</i>
2018/11/18	Comment: Registration Directory Service (RDS-WHOIS2) Review Team Draft Report of Recommendations	<i>The primary concern for the ALAC in the RDS-WHOIS2 Review is the accuracy of registrant data (WHOIS data) and its use by security and law enforcement bodies in addressing the misuse and abuse of the DNS system. The ALAC summarized their positions on the 16 Recommendations under Objective 1, as well as Objectives 3, 5, 6 and the ICANN Bylaws.</i>
2018/11/14	Comment: ICANN Seeking Community Feedback on Proposed Unified Access Model	<i>The ALAC cited their prior statement from 10 April 2018 relating to the access of WHOIS, and offered (4) general comments on the proposed UAM: (1) Any access model must be compliant with the GDPR, and ICANN should obtain legal advice from expert counsel to confirm compliance; (2) Internet end user rights should be part of the calculus, including knowledge of email sender identity, et al; (3) The UAM design should be scalable and not overly-reliant upon manual updates, and should have a well-defined taxonomy of abuse types, et al. Once an agreed upon set of inputs and outcomes is established, an automated system may be created to respond to WHOIS requests; (4) The various harms taken into account when considering the UAM must be done so in a non-biased fashion.</i>
2018/11/12	Comment: Draft PTI and IANA FY20 Operating Plan and Budgets	<i>After consultations with the ICANN Finance Department and ALAC Finance and Budget Subcommittee (FBSC), the ALAC submitted comment on (4) sections of the Draft PTI and IANA FY20 Operating Plan and Budgets, including the Executive Summary, PTI Services Financial Overview, PTI Services Overview and PTI Services and Operating Plan.</i>
2018/10/24	Advice: Follow-Up to the Joint Statement by ALAC and GAC: Enabling Inclusive, Informed and Meaningful Participation at ICANN <u>Note: submitted to ICANN Board as ALAC Advice, ratified during ICANN63.</u>	<i>In its follow up to the joint statement, the ALAC and GAC agreed in the context of the Information Transparency Initiative (ITI) that clear and up-to-date information (from ICANN) to facilitate quick understanding of relevant issues and high interest topics is key for inclusive, informed and meaningful participation by all stakeholders, including non-experts – as, in the context of the IANA transition process – ICANN was able to offer timely and comprehensible information by breaking down complex issues into understandable components, which allowed interaction within the entire community. The ALAC and the GAC ask from ICANN that the same level of effort be made and the same service be provided to the community concerning information on all other relevant issues.</i>
2018/10/13	Comment: Proposed gTLD-Registration Data Access Protocol (RDAP) Profile	<i>The ALAC recommends that ICANN adopt the RDAP quickly and effectively because they hold it is an essential step for ICANN to deploy a tiered-access model adequately. In addition, the ALAC recommends that ICANN address 5 ambiguities in the RDAP that are also present in the European Union's (EU) General Data Protection Regulation (GDPR), noting them in the statement.</i>
2018/10/05	Comment: Next Steps on Reviews	<i>The ALAC supports the proposed path forward for the ATRT3, while stating the consideration of how to streamline specific reviews to make them more effective and impactful is a low priority item for ATRT3. The ALAC encourages active community participation in formulating any recommendations in organizational reviews, and states that specific reviews operating standards should take a minimalist approach.</i>

2018/09/26	Comment: Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4)	While the ALAC and wider At-Large community continue to debate the actual benefits to communities in expanding the New gTLD Program, they acknowledge that the Program will likely continue to be expanded in one form or another. In this respect, the ALAC put on record their responses, suggestions and in some cases, advocacy, to the preliminary recommendations and questions as posed by the GNSO New gTLD Subsequent Procedures PDP Working Group in its Initial Report, from the perspective of and benefit to Internet end users At-Large. The ALAC highlighted key consensus positions on the 86-page statement, including: Concept of "Rounds", Community Applications and Community Priority Evaluation, Metrics, Public Interest Commitments, Applicant Support Program, IDNs, Universal Acceptance, SSAC Research and Recommendations, Objections, and High Standards for Applicants.
2018/09/17	Comment: Recommendations for Managing IDN Variant Top-Level Domains	The ALAC believes the main challenge while integrating IDN variant top-level domains is to balance positive user experience while ensuring the security, stability and manageability of the DNS. The ALAC provided advice on (4) questions posed by ICANN regarding the issue, and in general believes strict adherence to the Root Zone LGRs are the most appropriate way of arriving at IDN variant labels.
2018/09/10	Comment: Draft ICANN Africa Strategic Plan 2016-2020 Version 3.0	The ALAC recommended (1) an increased number of African ICANN staff to be seriously considered in the Draft Africa Strategic Plan; (2) involving more African participation in strategy planning and implementation; (3) local capacity building; (4) increased representation of African stakeholders in the SOs and ACs in addition to the ALAC and GAC. The ALAC also noted criteria for implementation should be further developed, and offered collaboration with the African community in At-Large.
2018/08/31	Comment: IPC/BC Accreditation & Access Model for Non-Public Data v1.7 <u>Note: Not a formal ICANN Public Comment.</u>	The ALAC understands that tiered access is the most probable solution to ensuring compliance with the General Data Protection Regulation (GDPR), yet it has serious concerns as to the structure of this proposed model. The ALAC recommends a three-dimensional access model of accreditation: 1) identity of the petitioner; 2) determining the petitioner's purpose; and 3) requesting information on how they will use that data. The ALAC feels these considerations towards the access model will propel the ICANN community further towards a reliable and trusted domain name system (DNS).
2018/08/06	Comment: Open Data Initiative Datasets and Metadata	The ALAC made specific comments in relation to: (1) Centralized, easy access to properly organized data repository, (2) Types and value of data collected, lack of discernable information; (3) Uniformity of and responsibility for data; and (4) Privacy rights. Overall, the ALAC believes it would be useful if ICANN Org could assist in re-generating a list of datasets with suggestions on what downstream or upstream information can possibly be gleaned from each dataset.
2018/07/31	Comment: Initial Report on the Protections for Certain Red Cross Names in all gTLDs – Policy Amendment Process	The ALAC has always taken the position that as a humanitarian organization, and one that has been regularly the target of those seeking to fraudulently attract donations, the Red Cross should be afforded the courtesy of having its various identifiers protected at the second level in gTLD domain names.
2018/07/31	Comment: Short-Term Options to Adjust the Timeline for Specific Reviews	Of the three options presented on the public comment, the ALAC prefers the option to commence RT work upon Board action on CCWG-WS2 recommendations, to be started no later than end of June 2019. With this option, the review team will be in charge of the evaluation of implementation of prior review recommendations and other topics, with no duplication or overlap with CCWG-WS2 implementation.
2018/07/31	Comment: Long-Term Options to Adjust the Timeline of Reviews	The ALAC approached the comment by separating it into two issues: (1) Organizational Reviews and (2) Specific Reviews. The ALAC recommended ICANN Org stop initiating Organizational Reviews until its is assessed how effective they have been and develop a methodology to allow them to be cost effective and effective overall. The ALAC also recommends changing the Bylaws to give the Board more flexibility with the timing of Specific Reviews going forward.
2018/07/27	Comment: Draft Proposal of the New Fellowship Program Approach	The ALAC provided extensive community comment on (4) issues related to the Draft Proposal of the New Fellowship Program Approach, including application and selection criteria of the Fellowship Program, as well as on-site recommendations and post-meeting requirements.
2018/07/16	Comment: Draft Community Travel Support Guidelines	The ALAC submitted a detailed statement representing the Internet end user community within ICANN. The ALAC noted At-Large is unique within the ICANN community in that most volunteers in At-Large activities do so as true volunteers. None travel in support of their employers, few are employed by what could be considered the domain name industry or in activities supporting it, and many are not even employed in jobs supporting the Internet.
2018/06/20	Comment: Release for Registration one .COM Domain Name with a Single-Character Label: O.COM	During ICANN62, the ALAC revised, ratified and resubmitted their statement. The ALAC supported the proposition, provided it offers the proceeds to nonprofit organizations that serve the public interest. The ALAC offered three suggestions to that end: (1) ICANN should permit the release of O.com and allow Verisign to conduct a third-party auction, (2) Third-party auction service providers should screen candidates for auction, and (3) Verisign should forfeit the auction's proceeds and renewals to non-profit entity.

2018/06/10	Comment: Draft Final Report of the RSSAC2 Review	<i>The ALAC is responsible for representing the interests of Internet end users within ICANN, and there are few parts of the Internet as critical as the Root Server System. The ALAC commented specifically on recommendations 1, 2 and 5 of the RSSAC2 Review, related to 1) RSSAC membership criteria, the 2) RSSAC charter and 3) engaging more effectively with ICANN.</i>
2018/05/11	Comment: CCWG-Accountability WS2 Final Report	<i>The ALAC noted that the assurance of full consistency between all of the recommendations - which are noted in the report to be more than 100 - would depend primarily on the interpretation of the recommendations and the implementation plan. The ALAC recommends dedicating enough time to ensure inconsistencies do not result due to misinterpretation of the recommendations.</i>
2018/05/07	Comment: Draft Final Report of the NomCom2 Review	<i>On the whole, the ALAC believes the ICANN NomCom system has been working well considering the significant challenges it faces. The ALAC made 8 general comments to improve the function of the NomCom, noting that while confidentiality needs to be maintained, whenever possible, open, transparent processes should be adopted to represent the multistakeholder nature of ICANN.</i>
2018/04/25	Comment: ICANN Reserve Fund: Proposed Replenishment Strategy	<i>The ALAC supports the overall strategy, with several important conditions related to operational savings, auction proceeds, per-domain registrar fees and revenue.</i>
2018/04/18	Comment: Draft Project Plan for the Proposed Name Collision Analysis Project (NCAP)	<i>As the principle voice of end users within the ICANN community, the ALAC supported the SSAC in its efforts to address the issue of Name Collisions, while encouraging clarity on the SSAC's bidding process for work contemplated under the Draft Project Plan.</i>
2018/04/02	Comment: Draft Procedure for Community gTLD Change Requests	<i>Community TLDs are of crucial importance to At-Large. The ALAC supported the Draft Procedure (including the proposed Community gTLD Change Request Form), subject to three provisos articulated in the Statement.</i>
2018/04/02	Comment: Plan to Restart the Root Key Signing Key (KSK) Rollover Process	<i>The ALAC provided several recommendations to ICANN regarding the impending KSK Rollover, and called for a holistic review including a risk assessment of the alternatives, in time for further discussion at ICANN62.</i>
2018/03/30	Comment: Data Protection/Privacy Issues: ICANN-proposed Interim Model	<i>Overall, the ALAC agreed with the Interim Compliance Model's tiered access approach, while remaining divided on several other issues including purposes of processing WHOIS data, applying the Interim Model on a global basis, and distinction between legal and natural persons.</i>
2018/03/30	Comment: ICANN Fellowship Program Community Consultation	<i>The ALAC suggested that changes are required in order to achieve greater effectiveness of the Program, not only to meet At-Large policy goals relating to the DNS.</i>
2018/03/08	Comment: ICANN Draft FY19 Operating Plan and Budget and Five-Year Operating Plan Update	<i>The ALAC supports a balanced budget, while recommending increases be clearly explained and cuts refrain from targeting the most vulnerable community volunteers and activities.</i>
2018/02/01	Comment: Proposed Incremental Changes to the ICANN Meetings Strategy	<i>The ALAC agrees with no change regarding the Community Forum, but recommends at least 5 days for outreach at Policy Forum and 6 days plus 1 additional for wrap up activity at the AGM.</i>
2018/01/15	Comment: Competition, Consumer Trust, and Consumer Choice Review Team - New Sections to Draft Report of Recommendations	<i>The ALAC overall supports Recommendations A, B, C, D and "Recommendation 5" relating to DNS Abuse.</i>
2018/01/14	Comment: Recommendations to Improve ICANN's Office of Ombudsman (IOO)	<i>The ALAC recommended language diversity in Staff resource configuration, and is of the opinion policing of the Ombudsman should not be a solution to fix a performance issue.</i>

2018/01/14	Comment: Recommendations on ICANN Jurisdiction	<i>The ALAC fully supports the Subgroup proposal, articulating the need for a path forward for Jurisdiction concerns beyond the CCWG, developing another multistakeholder process to resolve these concerns.</i>
2018/01/14	Comment: Recommendations to Improve ICANN Staff Accountability	<i>The ALAC fully endorses the CCWG Accountability recommendations, noting the suggestions to deal holistically with any contentious staff accountability issues are well developed.</i>
2018/01/14	Comment: Enhancing Accountability - Recommendations for Diversity	<i>The ALAC supports the recommendations for enhancing diversity as a whole, while emphasizing the need for language diversity and captioning/real time transcription (RTT) services, particularly for those whose first language is not English.</i>
2017/11/30	Comment: ICANN Reserve Fund – Public Comment on Rationale and Target Level	<i>The ALAC supports having the Reserve Fund at the level of 12 months expenses, and higher if there is a practical way of achieving that without unduly impacting ICANN's ability to provide necessary services. At whatever level the Reserve Fund target is set, the ALAC suggests ICANN must publish a plan on how and when this will be achieved.</i>
2017/11/02	Advice: Enabling Inclusive, Informed and Meaningful Participation at ICANN - A Joint Statement by ALAC and GAC <u>Note: submitted to ICANN Board as ALAC Advice: ratified during ICANN60.</u>	<i>The ALAC echoes the rationale provided by the GAC. Specifically: One of ICANN's core values is to seek and support "broad, informed participation reflecting the functional, geographic, and cultural diversity of the Internet at all levels of policy development and decision-making to ensure that the bottom-up, multistakeholder policy development process is used to ascertain the global public interest and that those processes are accountable and transparent" (Bylaws Section 1.2.c.ii). In the view of the GAC and the ALAC it is not only among ICANN's core values but also critical to ICANN's legitimacy to act in the global public interest to allow non-expert stakeholders to meaningfully participate in ICANN's processes and make their voices, their needs and interests heard, and duly take them into account in order to act and take decisions that are in fact, in the global public interest. These proposed measures will go some way to address this.</i>