



Brussels  
30 August 2013

**SUBJECT: Input from the Council of European National Top Level Domain Registries on the ICANN 5-year strategic planning process<sup>1</sup>**

**Role Clarity for ICANN**

ICANN's role as derived from its bylaws is clear and specific: "The mission of The Internet Corporation for Assigned Names and Numbers ("ICANN") is to coordinate, at the overall level, the global Internet's systems of unique identifiers, and in particular to ensure the stable and secure operation of the Internet's unique identifier systems."

In order to be able to fulfill this role, ICANN needs to continue to build the necessary relations with the different stakeholders, in particular with governments.

All additional activities and initiatives should be in direct support of the organisation's mission. The recognition and goodwill ICANN receives depend upon the excellence with which this core mission is fulfilled. By focusing on its core mission, ICANN will avoid being seen as a threat.

CENTR welcomes the decision to separate ICANN's operational role from its policy role. Considering that ccTLD policies are set locally, the aforementioned approach will help our community to contribute and participate in the relevant areas.

**ICANN Community**

It is CENTR's opinion that if ICANN wishes to succeed in its mission, it needs to ensure that the organisation is rooted deeply in the different stakeholder groups. Representation in certain stakeholder groups needs to increase. Broader public participation will reinforce its position in the global Internet Governance debates. ICANN should increase its engagement efforts and target those areas that are currently under-represented, like the SMEs. In most European countries they are at the heart of the economy, but they are hardly represented in the Internet international environment.

The expansion of the stakeholder groups may have an adverse effect on the impact that the current participants have in the process. Those groups that have currently shaped ICANN's policy and strategy might see their influence reduced as more and different voices join the debate.

Given the diversity and the growing number of its stakeholders and the role ICANN plays in the online environment, it is crucial that ICANN keeps investing in online collaboration tools and platforms. Assuming that ICANN succeeds in its efforts to attract more and more active participation, the current in-person meetings are

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<sup>1</sup> These comments have also been uploaded to: <http://www.icann.org/en/about/planning/strategic-engagement/introduction>

not scalable. The current meeting strategy as outreach mechanism should be reviewed as it is doubtful that the original goals (involving the regional Internet communities) are either cost efficient or successful.

To better understand this expanding and evolving group of stakeholders, ICANN could invest more in fact-finding and data analysis. These facts and figures could then be used as an additional input to the voices and opinions from those represented at the ICANN meetings. Collaboration with international organisations (such as ITU or UNSTATS) should be envisaged as it could help in identifying the relevant datasets.

### Internationalisation & Regional Development

ICANN's current plans to truly internationalise the organization's operations deserve credit. Regional development and internationalisation should go hand in hand. By opening up on a regional (and through the engagement centers even a local) level, ICANN increases the chances that the current stakeholder groups get widened and deepened. The traditional mantra could be tweaked to: listen locally, act globally. Only those regional activities that serve or directly support ICANN's global mission should be considered. Regional involvement outside the scope of its global mission may push back certain stakeholders, in particular governments.

We do, however, encourage ICANN to clarify the link between the overall ICANN Strategic Plan and the regional strategies. Currently it is unclear how these fit into the global strategy.

### Internet Governance (IG)

The Internet Governance ecosystem should be regarded as an environment where, through expertise and experience based contributions, all stakeholders support the further development of an open and affordable Internet. In this context, ICANN has an important role to play. Not only because of the fact that its mission is critical to the functioning of the Internet, but also because it has a unique decade long experience working as a multi-stakeholder model with a strong track record (with the introduction of IDNs as a prime example). Through its own stakeholders and communication channels, ICANN can also help raising awareness on the importance of an inclusive and bottom-up approach to IG. Without broader recognition and awareness, the IG ecosystem risk to lock itself up in an ivory tower.

ICANN should not strive to steer the IG ecosystem, but be seen as a strong, respected and neutral contributor to advocate the models values.

### Security & Stability

According to ICANN's AOC (Affirmation to Commitment) signed on September 30th 2009 and the resulting 28 recommendations from the review team *Security, Stability and Resiliency of the DNS* (SSR RT) in their final report from June 2012, ICANN should develop a roadmap to enhance the operational stability, reliability, resiliency, security, and global interoperability of the DNS, which must be regularly updated by ICANN to reflect emerging threats to the DNS.

The SSR RT was particularly paying attention to:

- a. security, stability and resiliency matters, both physical and network, relating to the secure and stable coordination of the Internet DNS;

- b. ensuring appropriate contingency planning; and
- c. maintaining clear processes.

It is not clear if and how the recommendations from the SSR RT will be followed up by the Strategy Panel on Identifier Technology Innovation in the continuous work of ICANN. It is of CENTR's opinion that the panel could benefit from building from prior work rather than start all over. Nevertheless ICANN also need to take a longer view at some of the challenges facing the DNS (beyond root key rollover). The most recent update from the SSR work was published in the appendix to the FY 14 SSR Framework.<sup>2</sup>

CENTR would like to point out the importance of respecting the existing diversity as an essential element of the overall security of the DNS.

### Operational Excellence

Operational excellence starts with S.M.A.R.T. goals. Without them it is hard to measure the value of any initiative and its possible excellence. We encourage ICANN to introduce the SMART approach as soon as possible. Furthermore, CENTR fully supports the comments made by the SOP WG on June 26<sup>th</sup>, 2013<sup>3</sup>.

Long-term financial stability can only be achieved by finding sufficient (financial) support and commitment for projects and activities before launching them. Therefore, it is of paramount importance that ICANN looks carefully into the economic aspect of any action.

More than in any other area, operational excellence is a must for the IANA function. Improvements over the recent years have led to high standards and meeting expectations. CENTR encourages IANA to continue to reach out to the relevant communities and commits to providing feedback where relevant.

### Domain Name Industry

ICANN should not get involved in R&D activities or innovation in the DN industry. On technical issues, the IETF plays that role. Business innovation should come from the businesses.

ICANN could, however, provide a platform to showcase innovation and recognize R&D efforts. In this way and by raising awareness, ICANN could support those that have invested in these initiatives.

ICANN's relation with the registries and registrars will change as their increasing number will require a different type of interface and communication avenues. In the gTLD space, the contractual relations will remain the foundation for the way ICANN and the registries or registrars interact. As for the relations with the ccTLD, we would like to underscore once more the importance of having a community with immensely valuable experience and expertise that is happy to share it with ICANN anytime it is needed.

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<sup>2</sup> <http://www.icann.org/en/news/public-comment/ssr-fy14-06mar13-en.htm>

<sup>3</sup> <http://ccnsb.icann.org/workinggroups/sop-comments-op-budget-fy14-26jun13-en.pdf>