The ICANN GNSO "Business Constituency"

Comment on
Initial Report on Data & Metrics for Policy Making

Status: FINAL
Version: 1
7-Sep-2015

Business Constituency Submission

GNSO//CSG//BC

Background

This document is the response of the ICANN Business Constituency (BC). The BC's comments arise from the perspective of Business users and registrants, as defined in our Charter[1]:

> The mission of the Business Constituency is to ensure that ICANN policy positions are consistent with the development of an Internet that:
>   1.   promotes end-user confidence because it is a safe place to conduct business
>   2.   is competitive in the supply of registry and registrar and related services
>   3.   is technically stable, secure and reliable.

On 29-July-2015, ICANN's *Initial Report on Data & Metrics for Policy Making* was posted for public comment.

BC Comments

1.   The BC recognizes that this WG proposes to improve ICANN's addressing of critical issues pertaining to registrants, registries, and registrars by developing solutions to improve the approach to developing consensus policies, and by evolving ICANN's culture into a better-informed, fact-based policy development and decision-making organization.

2.   The BC strongly supports the use of data and metrics, among other tools, to aid in ICANN's policy making processes. Specifically, the BC believes that the use of data and metrics as a complement to the multi-stakeholder process will improve the effectiveness of the PDP by helping the community set clear goals and benchmarks at the outset, and will also help focus efforts on the initiatives with the most significant impact on the community.

3.   The BC believes that Working Groups should be encouraged to use data sources that are preexisting and/or publicly available when considering what data and metrics would support a PDP, as to minimize the costs and delays associated with appointing a new third party provider to collect and handle the information. To the extent that the use of data and metrics as described in the initial report becomes a regular and major part of the PDP, ICANN should consider hiring additional staff with the requisite skills to manage the collection and analysis of such data.

     Improved approaches to making policy may be found via other organizations with similar challenges whose work can serve as examples. Also, the academic discipline of policy-making continues to progress, and likely has useful information for addressing specific uses of data and metrics. (One example: "Cambridge Conference: Policy-Making in the Big Data Era", June 2015; http://www.publicpolicy.cam.ac.uk/data-for-policy-conference)

---

[1] Business Constituency Charter, at http://www.bizconst.org/charter.htm.

4. The BC supports the recommendation to include Key Metric Considerations at the chartering stage of the PDP. As a PDP may have numerous objectives and phases, we recommend that the chart provided in Annex A be modified to clearly and specifically define the issue or prospective improvement associated with a particular data point.

5. The BC supports the collection of qualitative data, in addition to quantitative data, to the extent that it is not already captured in the multi-stakeholder process. Qualitative data is particularly important where policies touch on Internet users. Given the size and diversity of this community, it may not be possible to garner an accurate and fully representative view of users' perspectives solely through the ICANN Working Group model. Accordingly, policies that directly affect users could significantly benefit from surveys or direct observation of more representative samples of users. However, qualitative input should be used to inform and interpret data and metrics, but not to replace or outweigh them.

6. The BC appreciates ICANN's move toward research-based policymaking, and envisions an outcome with an adaptive approach that will improve the quality of ICANN policies.

--

Angie Graves, Andy Abrams, and Tim Chen led drafting of these comments.

These comments were approved in accordance with the BC Charter.