

ALAC Updates ---- Oct-Nov 2022

Policy Development Activities

Statements approved by the ALAC

[Proposed Updates to the GNSO Operating Procedures Public Comment Proceeding](#)

The At-Large Advisory Committee (ALAC) and At-Large Community welcome the opportunity to respond to the call for Public Comment.

The ALAC has only one request for the Generic Names Supporting Organization (GNSO) in regards to the Council Committee for Overseeing and Implementing Continuous Improvement (CCOICI) Review of Working Group Self Assessment Requirements document. Under item 3, "Primary Organizational Affiliation," which is that we request that "At-Large Community" be included as an option in the list of responses, in addition to the existing option of "At-Large Advisory Committee (ALAC)."

A distinction between the ALAC and the At-Large Community ought to be recognized for the following considerations:

1. Membership to the ALAC is solely by way of either selection through Regional At-Large Organizations (RALOs) or appointments by the Nominating Committee (NomCom).
2. Except for the (proposed) "NomCom appointee (GNSO)" and "NomCom appointee (other)" response options, all the other organizations listed are ones where a person can join as a 'grouping' in which case, the appropriate grouping for us is the At-Large Community (and not the ALAC).
3. Since the GNSO Operating Procedures still allow for open-model policy development process working groups, an At-Large member could still identify themselves as a member of the At-Large Community and should do so if they are not appointed or selected by the ALAC to represent the ALAC in a particular PDP working group.
4. The requested amendment does not negatively impact the nature or substance of the assessment survey, but seeks to offer a respondent the ability to be more precise about their affiliation.

Justine Chew, ALAC Liaison to the GNSO, had also submitted this request during the GNSO Council meeting of 17 February 2022. Page 3 of the GNSO Council meeting minutes provide this as an action item with the following comment:

With respect to the suggested revisions to the Working Group Self-Assessment, the CCOICI to consider those made during the meeting for incorporation in its Final Report which will be submitted after review of public comments (namely, whether it should be possible for respondents who choose to, to have their name published in the summary report and adding "At-Large Community" as one of the respondent affiliations to the survey).

[Universal Acceptance Roadmap for Domain Name Registry and Registrar Systems](#)

1. ALAC appreciates the opportunity to comment on this report.
2. ALAC appreciates the Universal Acceptance Steering Group's (UASG) efforts to publish this report, as it provides a systematic roadmap for assisting Registries and Registrars to achieve UA compliance. ALAC believes that the document will highlight the issue of UA compliance within the registry and registrar communities, and will assist the community to achieve compliance.
3. Since the document is largely targeted at Registries and Registrars, and direct end-user impact is limited to some well-known protocols already documented, ALAC would like to provide the following comments on a few topics that may help build better clarity.
4. The report has chosen not to consider the issue of Internationalized Domain Name (IDN) variants, presumably as the policy for delegating top-level variants (as well as for harmonizing policies on IDN variants at the second level) is being created as we speak.
 - a. As the report concedes, IDN variants will have a significant impact on the software used by registries and registrars, as, for the first time, there may be a need to treat a source label together with its variants in the form of a variant set.
 - b. This is new functionality, and every test for UA compliance would need to check for the integrity of the whole variant set as well. On this topic, we believe that a slightly deeper analysis of the nature and magnitude of the impact of IDN variants--as and when policies are adopted to integrate them--would add value to the report, and also provide the Registry-Registrar communities with advance notice of this issue.
5. The report does not mention the role of resellers. Given that the role of resellers is important, and they need to be UA-ready as well, an analysis of their operations and software use--such as standalone software or API-integration to registrars--would enhance the completeness of the report.
6. The report also does not take into account the continuing changes to the access mechanisms for registration data, although it does mention WHOIS and Registration Data Access Protocol (RDAP). An analysis of the impact of regulatory frameworks such as the General Data Protection Regulation (GDPR) and its possible impact on UA Readiness of Registries and Registrars would also be useful.

[Pilot Holistic Review Draft Terms of Reference \(ToR\) Public Comment Proceeding](#)

The ALAC/At-Large appreciate the opportunity to comment on these ToR for the Pilot Holistic Review. However, the ALAC/At-Large remain concerned that this Public Comment proceeding was not opened until the end of August and has a timeline that closes on 20 October 2022, with reporting by the start of 4 November 2022. Even with all due haste, kicking off the Pilot Holistic Review process at the beginning of 2023 is still going to be a challenge. Although we accept that the pilot is to be started and progressed in the most expedient way possible, we understand that this will require efficient and effective preparation and planning of project aspects and

workflow, before the actual start of the Review being done. Both of these phases will require Community support in a timely manner and this may extend the timeline and will require efficient preparation and planning of multiple aspects before the actual start of the Review. To minimize risks of time slippage here it seems essential that proper *prior* preparation occurs and is carried out in a well-planned and clearly understood manner.

ALAC/At-Large notes that the Public Comment proceeding for the ToR states that the ICANN Board "would also welcome input on the pilot Holistic Review scheduling and timing in light of other community and stakeholder work." We believe that the expediency and effectiveness of this pilot Holistic Review is integral to the implementation and conduct of other essential community and stakeholder continuous improvement initiatives. These would include initiatives outlined and envisaged in the recommendations from previous cross community activities and Specific Reviews, such as CCWG-Accountability Work Stream 2 and ATRT3. Relating specifically to ATRT3, we support the recommendations related to the initial and following Holistic Reviews for ensuing Reviews and SO/AC/NomCom Continuous Improvements. To reiterate our responses to the specific questions posed in the call for Public Comment please note ALAC/At-Large:

1. Support the Pilot Holistic Review Terms of Reference as drafted.
2. Agree that the Holistic Review Program outlined in Section II of the Draft Terms of Reference provides a clear approach to accomplishing ATRT3's objectives while addressing the information gaps identified by the ICANN Board.
3. Further agree that the steps and the deliverables associated with each ATRT3 recommendation 3.5 objectives, as described in Section II of the Terms of Reference, are clearly defined and outlined the scope of work for the Pilot Holistic Review.
4. Particularly appreciate the clarity that the steps and the deliverables associated with each ATRT3 Recommendation 3.5 objective, as described in Section II of the Terms of Reference, explain how Supporting Organizations, Advisory Committees, Nominating Committee, as well as their constituent parts participate in the process of establishing a Holistic Review Program.

The Holistic Review Pilot Project is an unprecedented effort that will significantly contribute to improving ICANN Reviews and the multistakeholder model. ALAC/At-Large support the establishment of the Holistic Review as part of the overall ICANN org Review process, rather than remaining a pilot. ALAC/At-Large appreciate that the ToR for the Holistic Review are important to frame during this pilot phase.

ALAC/At-Large recognize and appreciate the work ICANN org and the ICANN Board are doing in support of evolving ICANN, and specifically note that the contributions made through the Holistic Review process will no doubt be highly significant to this evolution.