

Country Code Name Supporting Organization

January 2010

To: Ambassador Jānis Kārklīš
Chair - ICANN Governmental Advisory Committee

By Email

Draft GAC Principles on IDN ccTLDs

Dear Jānis,

I am writing to convey the views of the ccNSO Council on the GAC's draft Principles on IDN ccTLDs¹.

Firstly, the ccNSO Council welcomes the GAC's willingness, as expressed in its Seoul Communiqué, to delay adoption of a formal principles document to allow the opportunity for further consultation with other ICANN Supporting Organizations and Advisory Committees.

While the ccNSO Council understands the GAC's traditional practice of developing statements of principle, it holds concerns about the way in which a finalised GAC position could impact upon the flexibility and effectiveness of ICANN's ongoing multi-stakeholder processes and, specifically, the current IDN country code Policy Development Process.

The ccNSO Council is concerned that the adoption of any formal GAC principles on IDN ccTLDs may be inconsistent with one of the primary tenets followed throughout the recently concluded IDN fast-track process: **that no actions or decisions should pre-empt the outcome of the IDN cc PDP.**

This guiding principle was codified in both the Final Report of the IDNC Working Group and the Implementation Plan for the IDN ccTLD fast-track. The ccNSO Council notes that representatives from the GAC participated, along with all other Advisory Committees and Supporting Organisations, in the development of both of these documents, and agreed that it would be inappropriate to pre-empt the IDN ccPDP.

Throughout ICANN's history, GAC Principles documents such as those relating to the delegation and administration of ccTLDs and the introduction of new gTLDs have stood as a clear, definitive position from governments on key issues and have been afforded considerable policy priority and operational adherence.

The ccNSO Council would welcome the GAC's consideration of releasing its perspectives on IDN ccTLDs as a series of "Interim Principles" that would provide valuable input to the Policy Development Process and facilitate ongoing deliberation of key issues within that process without presenting a final governmental position. The provision of interim

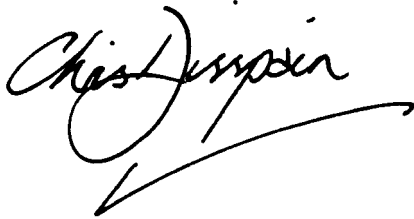
¹ As attached to the GAC Seoul Communiqué: http://gac.icann.org/system/files/Seoul_communique.pdf

principles would assist not only the GAC representatives on the IDN PDP Working Group, but also the Working Group as a whole.

The ccNSO Council would like to understand why, given the GAC is directly and actively involved in the PDP, the GAC feels it necessary to develop a definitive policy position in isolation of this process.

In order to develop a better mutual understanding of the issues at hand and how best to resolve them, the ccNSO Council would welcome the opportunity to discuss these matters with the GAC either through an open email list or a dedicated teleconference, prior to ICANN's Nairobi meetings.

Yours Sincerely,

A handwritten signature in black ink that reads "Chris Disspain". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Chris Disspain
Chairman – ccNSO Council