| **IRT Feedback, 19 Sept, App Guide v2** | | | | | |
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| **Issue** | **Section** | **Topic** | **Issue** | **Summary of IRT Input** | **Status** |
| 1 | Accreditation Criteria | Applicant tracks | Do we really need 4 tracks? Could we just have two (affiliated/non-affiliated?)—raised by Volker Greimann | **Steve Metalitz**—Section 6 in the application needs to apply to both affiliated and non-affiliated applicants. Particularly if these are changed to “confirmation” type questions there should be less of an issue for affiliated applicants to complete.  **Vicky Sheckler—**agree with Steve | ICANN is reviewing draft application per IRT input. It’s likely that tracks could be simplified or reduced as the application is restructured. |
| 2 | Accreditation Criteria | Criteria, generally | (Volker) A lot of the requirements seem excessive (especially datacenter certification). Many of these could be certified by a yes/no answer. Focus on the bare necessities for both affiliates and non-affiliates. | **(Alex Deacon)** Why wouldn’t we ask this for non-affiliates? If we don’t ask non-affiliates, there would be a gap between what we get for affiliates (via other evaluations) and non-affiliates.  **(Volker)** Not saying we strike all of these, just dial it back to what is absolutely necessary. Avoid requiring costly documentation (such as corporate documents) where items could be self-certified.  **Vicky Sheckler**--+1 Alex  **Alex**-+1 Volker for affiliates  **Theo Geurts**—this makes sense for affiliates that we already have this info, for non-affiliates, it’s more of a balance we need to provide here. From my PoV, if we can trim this down and make this more logical, onboarding will be less costly.  **Volker Greimann**—the question I’m asking is how much detail is needed? A lot of this could be handled by self-certification that the entity is in compliance (like annual registrar certification); the educational course also duplicates the questions—shouldn’t have to do both | Criteria to be reviewed pursuant to more specific IRT feedback below. |
| 2 | Application for Accreditation, Section 3 | Background check questions |  | **Steve Metalitz**—because these are the same as what is asked for registrars, I don’t understand why this is so burdensome—they’ve already gone through this; if the registrar has already gone through this within the past year that can be sufficient—does this help? And for non-affiliates we should be asking basically the same thing  **Susan Kawaguchi**—even if it’s an affiliate, must ensure that those managing secondary entity are checked; if not screened previously they should be screened-not excluded across-the-board unless they are exact duplicate of those who have been previously screened  **Volker Greimann—**the requirements should be less for PP than Rrs; there should not be a recheck for affiliates. Also, we could potentially forego the background check by requiring the provider to post officer/director info on their website and letting the community check  **Steve Metalitz—**this was proposed in the new gTLD process (crowdsourcing the background check) and rejected  **Susan Kawaguchi**—this should not be a more lightweight process. Because Rrs are required to do many things by contract, there is more leverage. It’s also much more damaging to not getting info from a proxy than from a registrar. The proxy provider is a very critical function and also a major roadblock when trying to figure out who is doing bad things.  **Vicky Sheckler, Leana Melnichuk--+1 Susan** |  |
| 3 | Application for Accreditation, Section 6 | Proposed change to question format | Could we change from “essay”-type questions to “confirm you will comply”/checkbox type questions? | **Steve Metalitz—**What would ICANN do with the long-form answers? It seems most of these requirements are related to publishing info for the public, so you can see whether they are in compliance or not  Maybe questions like the labeling one are an exception, but the value of this is that registrars and the public need to know that the provider is complying with certain things, publicly—telling ICANN privately doesn’t facilitate that. There’s value to having these questions of compliance handled in a more transparent fashion rather than private negotiation with ICANN. Just make it clear that provider knows they have to publish this info and the public can see whether they are sufficient and living up to them.  **Volker Greimann—**Also, once you have these essay-style questions, what happens when the process changes?  **Greg DiBiase—**these answers could change. The important point is that the provider is meeting the requirement, not how.  **Steve Metalitz—**I agree this could get pretty complicated in the essay questions but the provider is going to have to do that because they have to publish info about their practices—their disclosure may be complicated. But the issue is where the disclosure is made and who it is made to. It’s important that it’s done and that it’s disclosed. We need to look at each question individually, such as the labeling one. | ICANN is revisiting the structure of the application per IRT feedback and will be presenting a draft v3 for IRT discussion. The draft will change many of the “essay”-type questions to “confirmation”-type questions. |
| 4 | Fees |  | IRT proposal to reduce fees for application and annual fee | **Volker Greimann—**I propose that as compliance has no additional work, fees for registrars should cover their affiliated providers. The fees are too high and are not economical—the costs will drive people out of business.  **Steve Metalitz—**We need more info about the costs underlying the fees proposal  **Theo Geurts—**We need to reduce these fees significantly. We provide these services for free-I don’t want to pay another 4k a year; agree should be cost-based, but we should streamline to reduce costs  **Leana Melnichuk—**the costs should not be more than ICANN costs  **Vicky Sheckler—**the fees shouldn’t be less than ICANN’s costs  **Volker—**The community has lobbied for this accreditation program, so perhaps the community should pay for it by having the costs of the program come out of the ICANN budget; the budget has a lot of potential for savings  **Vicky Sheckler—**if PP is a loss leader then need to consider revenue affiliated providers obtain from other services in considering whether a cost for accreditation is high  **Greg DiBiase—**Additional compliance efforts doesn’t justify this fee  **Susan Kawaguchi**—yes the community has demanded this, but there are quite a few good players out there that have processes for reveal, etc. But the real cause of the demand from the community was the providers that do not play well, do not respond, etc, so Compliance is going to have quite a job. This shouldn’t be a profit center but there are going to be costs in managing this. | ICANN is preparing more detailed documentation re: anticipated program costs for IRT review and discussion. |
| 5 | Definitions | Current definitions of “privacy” and “proxy” | Definitions in PPAA were updated to reflect other defined terms (the edits were non-substantive, such as changing “beneficial user” and/or privacy and/or proxy customer to “Customer”, changing WHOIS to “RDDS” etc). In latest comments on App Guide draft, it was recommended that we revert to the definitions in the Final Report | No input received on 19 Sept IRT call. | The IRT previously was presented with these edits and these were not opposed by anyone present on the call or on the list the following week. If multiple IRT members would like to revisit this, we will raise this issue again on a subsequent IRT call. |