



The Intellectual Property Constituency (IPC) appreciates this opportunity to comment on the North American Engagement Plan published on July 10, 2025 (the "Plan").

The IPC is one of the stakeholder groups and constituencies of the Generic Names Supporting Organization (GNSO) of the Internet Corporation for Assigned Names and Numbers (ICANN) charged with the responsibility of advising the ICANN Board, Organization, and other stakeholders on policy issues relating to the management of the domain name system (DNS), particularly on matters pertaining to intellectual property and consumer protection. The IPC represents the views and interests of owners of intellectual property worldwide, with a particular emphasis on trademark, copyright, and related intellectual property rights and their impact on and interaction with the DNS. We also represent the interests and concerns of consumers who depend on strong intellectual property protections as an essential element of building and ensuring consumer confidence, consumer trust, and consumer protection. Our members include individuals, companies, law firms, and intellectual property organizations from around the world.

Our comments on the Plan are described below.

Strategic Objective 1: Inclusivity

Outreach to Indigenous Communities - The IPC notes that there are numerous indigenous communities located in North America and recommends that such communities be targeted specifically for outreach and inclusion. For example, organizations such as the Tribal In-house Council Association and the US Government Bureau of Indian Affairs as well as the Crown-Indigenous Relations and Northern Affairs Council of the Canadian Government, can be helpful. The Mexican government also has a National Institute of Indigenous Peoples (INPI). The IPC notes that GAC members and Observers may be helpful in making the appropriate connections. More specifically, the Strategic Goals should expressly include references to outreach and inclusion of Indigenous Peoples.

Leadership Development - The IPC recommends that a sub-goal could be added to encourage leadership development and support for multistakeholder representatives. The IPC believes that inclusive representation and collaboration are easier with stronger leadership development paths.

Strategic Goal 1.1

The IPC notes the use of conditional language such as "to the extent feasible" and "where possible and appropriate" in the discussion of planned efforts toward inclusion and increasing participation. In this regard, it is recommended that such conditional language be deleted. A

reasonable substitute might be "consistent with fiscal considerations" or some other language that is more clearly defined as a limitation on these efforts would be appreciated.

With respect to the following goal: "[i]ncrease focus on the academic sector to recruit and/or retain potential stakeholders/newcomers," the IPC recommends increased focus on medium-sized and small commercial entities as well as indigenous peoples as both are currently under-represented in the ICANN policy-making processes. A key to such increased focus will be educating these communities as to best methods for onboarding and participating without substantial commitments of time, personnel, and travel costs.

Engagement in High Concentration Areas - The IPC questions whether the engagement needs to be in high concentration areas, especially if the outreach is virtual. There may be benefits to target developing tech spaces that should not be overlooked.

Global Communications - ICANN's communications should also highlight the benefits of the multi-stakeholder model and how the individual stakeholders are essential to that approach.

Effectiveness of Events - If ICANN desires to improve the effectiveness of its events in North America, it should increase the awareness of these events and invite ICANN colleagues to present outside of ICANN. If ICANN is supporting the multistakeholder model, then inviting members from other stakeholder groups to non-ICANN panels or engagements could help grow participation.

Engagement Tools ICANN could focus its attention toward technology companies, as owners and users of domains and as developers of new technologies using the DNS. In short, engage the tool creators.

Strategic Goal 1.2

Robust Communications We suggest that the reference to "robust communications within and outside the current ICANN community" is too vague to yield concrete and measurable results. A more detailed description of the specific intent behind "robust communications" is advisable.

Proactive engagement with Public Policy Stakeholders The 2026-30 Strategic Plan talks about proactive engagement with governments, regulators, IGOs and other public policy stakeholders. The IPC notes that the Plan does not address this topic, and would seem an important aspect of NA engagement. Since it is not clear where these robust communications are happening, the IPC encourages more transparency into these engagements. This includes transparency into the talking points that ICANN uses when engaging with governments. The IPC is concerned that the engagement often presents a one-sided perspective of the CPH, without presenting a more balanced position that highlights the IP and business impacts of domain name policies.

Cross-Functional Engagement - We recommend that ICANN simplify this language to focus on engaging cross-functionally on ICANN policy development. The current language sounds like a lot of process about process.

Strategic Goal 1.3

The IPC would appreciate more information as to the meaning of the term "like-minded organizations" in the reference to collaboration. Is this a reference to organizations that advocate for the Multi-Stakeholder Model? If so, we recommend expressly so stating in the plan.

We believe that identifying new collaborative organizations that overlap or complement ICANN is important. This should be the first step described in this section.

Strategic Objective 2 - Collaboration with Regional Stakeholders

The IPC recommends that stakeholder sectors in the region who are not currently actively involved in ICANN policy-making activities be specifically identified for collaboration. As noted above, this would include small to medium size commercial entities and indigenous tribes.

Strategic Goal 2.

Regarding the goal of raising awareness of the new gTLD Program and the Applicant Support Program, the IPC notes the difficulty in accomplishing this goal over a five year period when the next round will open in the spring of 2026 and the ASP Program application process closes in November of 2025 with no known date for reopening. Thus, with respect to the following language "Hold events in select targeted markets to raise awareness about new gTLDs and the availability of assistance through the ASP", the IPC recommends (1) further definition of how "targeted markets" will be chosen and (2) "availability of assistance" will be marketed given these circumstances. In other words, what activities and expenditures are most relevant during periods where no applications can be taken? Further thought is needed on how to achieve this goal during times when the opportunity to apply is not there. It's also unclear how "media and press coverage" regarding these aspects of ICANN's work will provide a benefit in relation to the cost of the same given the closing of the ASP window in 2025 and the closing of the next round in 2026. In this regard, it may be more productive for this goal to include focus on the ICANN Grant Program which presumably does not have the same time-bound restrictions.

Please also note the same comment as the one provided in 1.3 above with respect to "like-minded organizations".

Additional Educational Outreach - We believe that the Plan should also include events focused on educating people about ICANN's role and function and critical services, such as WHOIS or DNS abuse tools. ICANN could target law schools, business schools, computer science programs. ICANN could encourage membership for future professionals similar to the approach taken by INTA, where a pipeline is created for future trademark practitioners. ICANN could

consider expanding the NextGen Program to develop a pipeline of future community members outside of a specific regional ICANN meeting.

When speaking about Region, IPC believes that internet users' input have not been well-represented by the current ICANN structure and that it may be useful for ICANN and stakeholders to engage with Internet users to better understand their point of view.

Strategic Objective 3 - Strengthen the stability and security of the Internet's unique identifier systems

The IPC recommends broadening the scope of stakeholders involved in reinforcing the stability and security of the Internet's unique identifier systems. The limited scope of "partnership" today does not allow the spreading of security awareness and implementation.

Strategic Goal 3.1 - Strengthen partnerships with relevant stakeholders to reinforce the shared responsibility of ensuring secure and stable Internet unique identifier systems

Regarding the building up of awareness of new technologies and their potential impact on Internet operations, the IPC believes that opening partnerships with academia, civil society groups, and technical education institutions not merely by letting them know that they may participate but also to set up incentives to do so make them "feel" to be an integrated part of it.

New Strategic Goal 3.3 - Awareness and Outreach Addressing AI-Generated Scams

With the increase in AI-generated scam sites and lookalike domain names, the IPC believes that the Plan could also include a new strategic goal to focus on awareness raising and outreach to SMEs (and smaller, non IP-specialist law and security firms) so they are aware of the practical ins-and-outs of ICANN's policies (or lack, as the case may be) that impact their ability to enforce their rights online and to protect consumers.