



GoDaddy Comments Regarding the ICANN Community Participant Code of Conduct on SOIs and General Ethics Policy

GoDaddy appreciates ICANN's commitment to transparency and fairness in policy development and welcomes the draft Community Participant Code of Conduct on SOIs and General Ethics Policy. This draft represents a significant advancement in clarifying ICANN's expectations for participation in policy development and upholding the essential elements required for trust in the multistakeholder approach.

We recognize that there may be situations in which a party is unable to disclose their client(s), and in those rare cases, GoDaddy agrees with ICANN's conclusion that the participant forfeits the ability to participate in associated processes.

While this draft Code of Conduct is a commendable starting point, GoDaddy believes additional detail is required regarding enforcement. Without effective enforcement mechanisms, existing problems with the status quo will persist and we will not realize the benefits of enhanced ethical practices and transparency when participating in ICANN.

GoDaddy supports the perspectives expressed by the GAC in their comments on enforcement, particularly the need for "more elaboration on the means and ways envisaged to enforce provisions of the Code." Further, GoDaddy endorses the comments put forward by the Registrar Stakeholder Group:

"The Code does not speak to an escalation process beyond the relevant chair of the group or session where the issue occurred, other than to note that the Ombuds has no specific role in this scenario. Setting clear expectations in this regard, including what to do if the relevant chair does not adequately address the complaint as well as how to proceed in cases where the chair is themselves the subject of the concern, would benefit this Code. Further, there should be consideration of how best to empower the chair to take action—can they remove someone? What happens if someone decides not to stop participation at the chair's request? Is there an appeal process? The Code should be more clear about how issues with this policy will be adjudicated and should consider training for community members and leadership in understanding and enforcing the Code."

GoDaddy eagerly anticipates collaborating with the ICANN community in finalizing the Code and expresses gratitude to ICANN for acknowledging the significance of this matter.