2 July 2024

RrSG Public Comment

Policy Status Report: GNSO Policy & Implementation Working Group Recommendations

The Registrar Stakeholder Group (RrSG) welcomes the opportunity to provide a comment on the Policy Status Report: GNSO Policy & Implementation Working Group Recommendations. This report represents a significant undertaking by ICANN org to gather information about how these various Policy and implementation processes have been used so far, and we appreciate that effort.

While we support many of the recommendations in the report (specific input below), it is worth noting that these processes are only truly effective when coupled with a commitment to transparency. Transparency of interests is essential to the success and integrity of the multistakeholder model of Internet governance. Initiatives such as the ICANN Board's work towards an Ethics Policy can advance this goal and the RrSG looks forward to understanding how this work will set standards of participation for all members of the ICANN Community.

The RrSG has reviewed the Policy Status Report and offers the following specific input:

Expedited Policy Development Process (EPDP)

Having an EPDP and leaving out the Issues Report step does seem to decrease the overall timeframe for a PDP WG. We think it is good to have the option to omit certain phases in appropriate circumstances, as is currently the case.

It may prove useful for there to be consideration of an aspirational time frame set before a PDP begins, and then reviewed for reasonableness after the work is fully kicked off. The process around project timelines may benefit from review.

It would likely be helpful to the GNSO Council for this Policy Status Report to include metrics about meeting frequency and meeting duration so as to better understand their impact on the amount of days to completion. This could be added along with the chart in §3.3 and could inform those aspirational timeframes.

Regarding the requirement for early input, it should be up to the GNSO Council to decide if early input is required or not; it can be useful for Community members to refine their thinking at the start of a PDP but in some cases it may not be useful.

GNSO Guidance Process (GGP)

Recognizing that the timeframe for a GGP is longer than was generally anticipated, we agree that an improved method of precisely defining the scope of the tasks of a future GGP could be helpful.

Implementation Review Team (IRT) Principles & Guidelines

The RrSG supports the proposal to gather more data on how IRT time is used throughout the process, specifically with regards to re-litigation of issues and the other root causes noted in the Report.

Consensus Policy Implementation Framework (CPIF)

The RrSG supports the creation of processes to (a) modify existing policy which is impacted by the implementation of another policy, and (b) for the Board to reconsider approval of Policy Recommendations which are no longer fit for purpose. However we caution that there must be concern for unexpected consequences; the work from one group must not be able to to interfere with the work of another (returning again to the re-litigation of issues).

The RrSG also supports provision of guidance for how to proceed in cases where the disagreement concerns other implementation details, and the incorporation of the IRT Guidelines into the CPIF.