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STATUS: Ratified

### **AT-LARGE ADVISORY COMMITTEE** **ccNSO Proposed Policy for Specific ccTLD Related Review Mechanism**

On 01 August 2023, the Public Comment proceeding opened for the [ccNSO Proposed Policy for Specific ccTLD Related Review Mechanism](#). On the same day, an At-Large [workspace](#) was created for their Public Comment submission. The At-Large Consolidated Policy Working Group (CPWG), decided it would be in the interest of end users to develop and submit an ALAC statement. Michael Palage, At-Large representative for the Consolidated Policy Working Group volunteered to draft the ALAC statement.

On 5 September 2023, Michael Palage drafted the initial ALAC statement, which was posted to its workspace by ICANN Policy staff in support of the At-Large community. The recommendations and At-Large positions were discussed during weekly CPWG calls in September.

On 5 September 2023, the CPWG finalized the At-Large Public Comment submission. The ALAC chair, Jonathan Zuck, requested that the statement be ratified by the ALAC before submission to the ICANN Public Comment feature.

On 26 September 2023, staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 out of 15 votes in favor. 0 votes against, and 0 abstentions. Please note 100 % of ALAC members participated in the poll. The ALAC members who participated in the poll are ( alphabetical order by first name): Bill Jouris, Carlos Aguirre, Dave Kissoondoyal, Eduardo Diaz, Joanna Kulesza, Jonathan Zuck, Laura Margolis, Marcelo Rodriguez, Matthias Hudobnik, Maureen Hilyard, Naveed Bin Rais, Raihanath Gbadamassi, Raymond Mamattah, Satish Babu, Tommi Karttaavi. You may view the results here:  
<https://tally.icann.org/cgi/results?e=93aba9d0846>

The At-Large Advisory Committee (ALAC) appreciates this opportunity to comment on the proposed ccNSO Proposed Policy for a Specific ccTLD Related Review Mechanism. The ALAC and At-Large community are supportive of the important role that the ccTLDs

Managers serve within the ccNSO and the broader ICANN community. However, the ALAC and At-Large community respectfully submit that the proposed amendments to the ICANN Bylaws should be expanded to provide additional standing for “significant stakeholders” and “relevant government” under the proposed review mechanism for the reasons set forth below.

The IANA guidance on the delegating or transferring of a country-code top-level domain (ccTLD) clearly enumerates “a number of different organizations and individuals” that should be “involved” in this process.<sup>1</sup> Included in this list are “significant stakeholders” defined as “those parties that benefit from the operation of the ccTLD” and the “respective government.” Despite the critical role that these parties play in delegating or transferring a ccTLD, under the proposed policy and corresponding Bylaw amendments, **ONLY** the ccTLD Manager or “applicant for a new ccTLD” have standing to bring an action under this review mechanism.

Failure to expand standing to “significant stakeholders” and the “respective government” under the proposed policy denies these groups due process in the event that they disagree with IANA’s initial findings. The inclusion of “individual internet users” within the definition of “significant stakeholders” is why ALAC and At-Large community thought it was so important to file this comment.

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<sup>1</sup> <https://www.iana.org/help/ccTLD-delegation>