

Statement of the Non-Commercial Stakeholders Group on the ICANN Strategic Plan for Fiscal Years 2021 – 2025¹

The Non-Commercial Stakeholders Group (NCSG) welcomes the opportunity to comment on the draft ICANN Strategic Plan for Fiscal Years 2021 - 2025 published 20 December 2018 as the Board works towards finalizing the plan.

About Us

The NCSG represents the interests of non-commercial domain name registrants and end-users in the formulation of Domain Name System policy within the Generic Names Supporting Organisation. We are proud to have individual and organizational members in over 160 countries, and as a network of academics, Internet end-users, and civil society actors, we represent a broad cross-section of the global Internet community. Since our predecessor's inception in 1999 we have facilitated global academic and civil society engagement in support of ICANN's mission, stimulating an informed citizenry and building their understanding of relevant DNS policy issues.

Introduction to the Plan

Increased Internet use, greater regulatory activity, the IANA transitions and many other internal and external factors underscore the importance ICANN's next strategic plan in the form of a renewed vision statement, as well as new strategic objectives, goals, targeted outcomes, and risks. We echo the need for this plan to guide ICANN toward greater global representation, transparency, and accountability. The five primary trends synthesized from stakeholder input are largely acceptable to the NCSG. However, we request the board to revisit some of the details we note below.

Vision

We agree that updating the vision statement (in italics below) post IANA transition is necessary, but we do request changes in some instances.

To be a champion of the single, open, and globally interoperable Internet, by being the independent, trusted, multistakeholder steward of the Internet's unique identifiers, and by providing an open and collaborative environment where diverse stakeholders come together in the global public interest to:

- This introductory statement to the vision is acceptable.

¹ <https://www.icann.org/public-comments/strategic-plan-2018-12-20-en>

- *Secure operational excellence of the IANA functions;*

- We would prefer the term 'ensure', since to secure may be misconstrued to privilege the security concerns while 'ensure' more accurately reflects the desire to 'guarantee' excellence. We suggest that 'in the stewardship' be inserted into the sentence to clarify its scope. We therefore suggest that the vision be revised to read, "**Ensure operational excellence in the stewardship** of the IANA functions."

- *Continuously improve the unique identifier systems;*

- This statement is acceptable.

- *Strengthen the security of the Domain Name System and the DNS Root Server System;*

- This statement is acceptable.

- *Evolve ICANN's governance model to remain effective, transparent, and accountable;*

- This statement calls for action to remain the same. It implies that ICANN is effective, transparent and accountable. We feel that the wording should acknowledge that ICANN is far from perfect in these areas. A better wording would be "Evolve ICANN's governance model to be increasingly effective, transparent, and accountable".

- *Improve the effectiveness of ICANN's policy development processes;*

- There is a danger in privileging 'effectiveness' in the Policy Development Process without concurrently considering inclusivity. We would therefore prefer "Improve the effectiveness **and inclusiveness** of ICANN's **multistakeholder** policy development processes".

- *Anticipate and manage the impact of legislation and regulation; and*

- This statement is acceptable. We consider ICANN's headstrong refusal for over 20 years to adhere to its legal obligations vis-à-vis privacy law to have been an institutional failure. Should this continue, this could pose a significant threat to the organization's legitimacy, sustainability, and reputation.

- *Ensure ICANN is technically robust and financially sustainable.*

- This statement is acceptable.

Mission

- No changes are proposed and thus no comments are pertinent here.

Strategic Objectives

1. *SECURITY: Strengthen the security of the Domain Name System and the DNS Root Server System.*
 - We question the value of only mentioning one security issue (DDOS attacks linked to IoT devices on pg. 8) in the opening summary. This paragraph is not necessary in the introduction.
- 1.1 *Strengthen DNS coordination in partnership with DNS stakeholders to improve the shared responsibility for upholding the security and stability of the DNS.*
 - Agree with Targeted Outcomes and Risks
- 1.2 *Strengthen DNS root server operations governance in coordination with the DNS root server operators.*
 - Agree with Outcomes and Risks. Specifically we commend the goal of developing a coordinated emergency plan.
- 1.3 *Understand and mitigate security threats to the DNS through greater engagement with DNS hardware, software, and service vendors.*
 - We think the first outcome listed should be updated as follows replace the word 'Internet' with 'DNS and unique identifiers system': "*The inherent security of the DNS and unique identifiers system measurably increases, due to higher adoption of global open Internet standards and greater awareness of security threats among stakeholders.*"
- 1.4 *Increase the robustness of the DNS root zone key signing and distribution services and processes to meet growing security needs.*
 - Agree with Targeted Outcomes and Risks.
2. *ICANN's GOVERNANCE: Improve the effectiveness of ICANN's multistakeholder model of governance.*
 - Acceptable summary

- 2.1. *Address the increasing needs of inclusivity, accountability and transparency, while at the same time ensuring that work gets done and policies are developed in an effective and timely manner*
 - Agree with Targeted Outcomes and Risks.
- 2.2. *Strengthen ICANN's multistakeholder decision-making process.*
 - Remove "global public interest" and replace with "reliability, stability, and security of the DNS and Internet infrastructure".
- 2.3. *Strengthen the inclusivity and openness of ICANN's multistakeholder model by improving and sustaining diverse representation and active, effective participation.*
 - While we agree with the Targeted Outcomes and Risks, the NCSG believes participation should also be informed by evidence and knowledge. We therefore suggest revising this sentence to read, "... active, **informed**, effective participation."
3. *UNIQUE IDENTIFIERS: Evolve the unique identifier systems to continue to serve the needs of the global Internet user base.*
 - 3.1. *Encourage readiness for Universal Acceptance, IDN implementation, and IPv6 by increasing awareness to enable more end users to use the Internet.*
 - Agree with Targeted Outcomes and Risks.
 - 3.2. *Improve understanding of and responsiveness to new technologies by greater engagement with industry, academia, standards development organizations, and other relevant parties.*
 - Update to read "new technologies which directly impact the reliability, stability, and security of the DNS and Internet infrastructure" to ensure ICANN stays on mission.
 - 3.3. *Continue to deliver and enhance the IANA functions with operational excellence.*
 - ICANN does not deliver the IANA functions since the incorporation of PTI in 2016. Section 3.3 should be removed as its appropriate location is within PTI's documentation set and remit.
 - 3.4. *Plan a properly funded, managed, and risk-evaluated new round of gTLDs.*
 - The NCSG would welcome the opportunity to evaluate a new round of gTLDs. We ask that this sentence be revised so to read: "**Evaluate** a properly funded, managed, and risk-evaluated expansion of gTLDs."

4. *GEOPOLITICS: Address geopolitical issues impacting ICANN's mission to ensure a single and globally interoperable Internet.*
 - Acceptable summary
- 4.1 *Further develop early warning systems, such as ICANN org's Legislative/Regulatory Development Reports, to identify and address global needs and threats, demonstrating ICANN's trustworthiness in resolving the challenges within its remit in a timely manner.*
 - Agree with Targeted Outcomes and Risks.
- 4.2 *Continue to build alliances in the Internet ecosystem and beyond to raise awareness, and equip stakeholders from around the world to become active participants in ICANN's policy making.*
 - Agree with Targeted Outcomes and Risks.
5. *FINANCIALS: Ensure ICANN's long-term financial sustainability.*
- 5.1 *Enhance ICANN's understanding of the domain name marketplace.*
 - While market trends should be considered in organizational guidance, it should be noted that market trends are only relevant insofar as they overlap with the current mission of ICANN.
- 5.2 *Strengthen cost management and financial accountability mechanisms.*
 - Agree with Targeted Outcomes and Risks. These should not impact the community first, and efforts should be shared by all, including ICANN staff and the Board.
- 5.3 *Enhance ICANN's financial planning model to better balance economic changes and stakeholders' needs.*
 - Agree with Targeted Outcomes and Risks.

Conclusion

Some targeted outcomes are vague while others are very specific. We laud the clarity and focus of calling for specific planning, prioritizing, preserving actions. We feel that there should be an increased emphasis on the notion that a primary targeted outcome is to ensure that ICANN stays within its current mission statement and bylaws. Emerging technologies and greater interests from increased actors threaten to pull ICANN's attention and resources toward areas that do not directly pertain to the reliability, stability, and security of the DNS and Internet infrastructure. Staying aware of market trends may help ICANN stay financially solvent but should not become an undue distraction from clearly defined mission of ICANN.