Subject: Re: [Ext] Re: RPM PDP Phase 1 Report public comments -- longer submissions and deadline extension

Date: Friday, May 1, 2020 at 7:25:08 AM Pacific Daylight Time

From: George Kirikos

To: Policy Staff, [redacted], [redacted], public-comment@icann.org, Goran Marby, ICANN Complaints Office

Adding Goran Marby and the Complaints department to this thread, which ICANN has ignored since Monday. I see [redacted] logged in to the spreadsheet as I type this email.

Will anyone fix the comments system, or address the issues I’ve raised in a timely manner? If your response is slow due to the Covid-19 health crisis, then perhaps that is yet another reason for the comment period to be extended, as the same delays impact the public who wish to give feedback on this issue.

Sincerely,

George Kirikos
416-588-0269

On Thu, Apr 30, 2020 at 1:08 PM George Kirikos [redacted] wrote:
>
> Still no response? I see [redacted] logged in and viewing the spreadsheet
> in the top right corner, when I attempt to view current comments.....
>
> As a workaround, I even attempted to fill out the form a 2nd time (via
> a George Kirikos (part 2)), attempting to not overlap with the pages I
> already answered, but only continuing to new questions on later pages
> (page 4 and beyond). But, alas the exact same problem happened, and it
> got stuck where I couldn’t even go back a page, etc. It didn’t get
> submitted (so it doesn’t appear on the spreadsheet now), but this goes
> to show how broken the system is, that even attempted workarounds are
> a no-go.
>
> I’ve also talked to multiple people who wanted to make comments, but
> aren’t going to because the form is just too long, and they don’t have
> hours and hours to invest.
>
> Anyhow, my current intention is to simply email you whatever I have
> before the deadline, and staff can manually copy/paste all the
> remaining answers into the spreadsheet. They will need to be very
> careful, though, because the columns in the spreadsheet are not
> actually in the exact same order as they are in the form!!
>
> Is that fine? Please advise.
>
>
> Truly the public deserves better than this fiasco....if it was
> registry operators complaining, rather than a registrant, ICANN staff
> would be heeding their wishes.
>
> > Sincerely,
>
> > George Kirikos
>
> On Tue, Apr 28, 2020 at 8:00 PM George Kirikos wrote:
>
> > P.S. Just to be clear, even if broken up into multiple bite-sized
> > forms, there's still going to be a need to handle longer submissions
> > manually for certain responses, that just aren't going to fit within
> > 5000 character form limits (for the things like "what else do you want
> > to see" type questions). That's why ultimately email is best, rather
> > than the loathed Google Forms.
>
> > Sincerely,
>
> > George Kirikos
>
> On Tue, Apr 28, 2020 at 7:39 PM George Kirikos wrote:
>
> > P.S. To make a further concrete suggestion, if the horrid Google Forms
> > are to be retained (which I've pointed out have major problems, e.g.
> > not being able to accessed at all from China), then one should redo
> > them completely, so that instead of 1 form with 11 parts, there are
> > multiple smaller "bite sized" forms with only 5 or 10 questions per
> > form. In other words, there would be on the order of 20 forms, to
> > ensure that the broken limits don't cause the same issues as are
> > happening now (and 20 spreadsheets with results, etc.). And folks
> > would have to redo all their input, etc. Giving folks an extra 3 or 4
> > weeks to do this would make sense. [presumably you have the email
> > addresses of all the people who've submitted comments already, so they
> > know they can copy/paste things; or it can be done for them]
>
> > We're basically in this situation because (a) past feedback on the
> > horrible forms was ignored, and (b) the current form was never
> > properly stress tested.
>
> > But, ideally folks return to the traditional email submissions, which
> > are much more user-friendly.
>
> > Sincerely,
On Tue, Apr 28, 2020 at 4:33 PM George Kirikos wrote:

Copying in the public-comment@icann.org email, as I've received no response on this. Do you acknowledge that the comment system is broken?

Sincerely,

George Kirikos

On Mon, Apr 27, 2020 at 4:41 PM George Kirikos wrote:

I found this page in the Google Support site (why should I be debugging your systems, by the way, when you guys are getting PAID for this, and I'm not?):

https://urldefense.proofpoint.com/v2/url?u=https-3A__support.google.com_docs_thread_18979957-3Fhl-3Den&d=DwIFaQ&c=FmY1u3PJp6wrcrwl3mSVzgfkbSSS6sJms7xl4I5cM&r=0HadoWerBOd6z1JTSwDsel0ZFvwFofO7lMjEtzbac3o&m=kIjx9TD3ITCe8oGdArDbgNOHxYaW2EqZVX05Ct5Q48B0&s=Gp1uuu04YmftVVFUMEDn3aCwZIx6Nczm018ym3jgu2U&e=

and there appear to be GLOBAL limits of either 32,700 or 50,000 characters, depending on who you believe. This makes the system essentially unusable when you have very long forms, say if you have responses spread out over 11 pages and nearly 200 questions! (look at how many columns there are in the spreadsheet!!!)

Perhaps folks will not hit that limit if they limit themselves to repeatedly saying "Great work, guys" or "I agree with the comment submitted by [person] on behalf of [person]" submitted repeatedly (!!), but others with more substantial input would hit that limit (I've already apparently hit some limit on page 3, and haven't even gotten to the LONG comments for later questions on pages 4 through 11, which I can't even see as I can't get past page 3 now).

Anyhow, I think you'll need to START OVER and do a complete reboot of the public comments period, as the system isn't going to scale properly for longer surveys with detailed answers. No one apparently bothered to test things.
On Mon, Apr 27, 2020 at 2:46 PM George Kirikos wrote:

> Definitely a bug in your system. I spent the last half hour
> re-entering all my responses on page 3 (as I had saved a backup of my
> responses!). I then saved, and went back to "Edit". It let me save
> everything initially, but then when I went through the pages, clicking
> "No, I want to continue to the next section", I threw up that "Your
> response is too large. Try shortening some answers." again on page 3.
> So, it won't let me advance, and doesn't say which response(s) are too
> large (they clearly weren't too large when I initially entered and
> saved them!).

> Someone at ICANN blogged recently about "Best-of-breed software"
> https://urldefense.proofpoint.com/v2/url?u=https-3A__www.icann.org_news_blog_best-2Dof-2Dbreed-2Dsoftware-2Dnot-2Djust-2Dan-2Dotherthought&d=DwIFaQ&c=FmY1u3Plp6wcrwll3mSVzgfkbPSS6sJms7xcl4I5cM&r=OHadoWerBOd6z1JTSwDsel0ZFvwFofo7IMjEtzbac3o&m=kjx9TD3ITCe8oGdArDbgNOHxYfWZEqZVX05Ct5Q4GB0&s=zVWk-hDNwKb1DYfdO6mS0GL8i5diUux10_2f8LriCSc&e=

> This comment system is definitely NOT "best of breed", when it has
> bugs like this. Read what SSAC said about this, more than a year ago:
> https://urldefense.proofpoint.com/v2/url?u=https-3A__www.icann.org_en_system_files_files_sac-2D104-2Den.pdf&d=DwIFaQ&c=FmY1u3Plp6wcrwll3mSVzgfkbPSS6sJms7xcl4I5cM&r=OHadoWerBOd6z1JTSwDsel0ZFvwFof07IMjEtzbac3o&m=kjx9TD3ITCe8oGdArDbgNOHxYfWZEqZVX05Ct5Q4GB0&s=QvykYbWhTQ0x86RTqYHPo2gAaggPnuungxLrcjSgpG4&e=

>(page 3, footnote 3) "The new comment mechanism only allowed a
> predetermined subset of feedback, limited by what questions were asked
> and how they were asked. The form was ill-suited for providing
> feedback about higher-level issues, or about topics found only in the
> body of the report. We also have comments relevant to specific
> recommendations but found that our comments did not line up with any
> of the specific question/response fields. Ultimately we feel that this
> experiment was not entirely successful and is not yet refined enough
> to be used as a model for ICANN public comments."

> Yet, ICANN staff ignored this! I plan to blog about this later today,
Sincerely,

George Kirikos

On Mon, Apr 27, 2020 at 2:01 PM George Kirikos wrote:

And now when I try to use the form to edit, all my prior answers/submissions on page 3 have completely disappeared from the form!! They're blank on my side. Even though I can still see them on the worksheet, if I "View Comments" from:

https://urldefense.proofpoint.com/v2/url?u=https-3A__www.icann.org_public-2Dcomments_rpm-2Dinitial-2Dreport-2D2020-2D03-2D18-2Den&d=DwIFaQ&c=FmY1u3Pjp6wrcrWll3mSVzgfkbPSS6sJms7xcl4I5cM&r=0HadoWerBOd6z1JTSwDseI0ZFvwFofO7lMjEtzbac3o&m=kJx9TD3TCe8oGdArDbgNOHxYfWZEqZVXO5ct5Q4GB0&s=v0no1GMWMPz4TJ9HfGYb2dHWtddLPx-ZEOw-v6hrDB4&e=

This is a joke! It took me more than 6 hours to do page 3 over the weekend. I'm considered technically competent by most --- how would an "average" or "typical" user be expected to deal with this?

Sincerely,

George Kirikos

On Mon, Apr 27, 2020 at 1:51 PM George Kirikos wrote:

Furthermore, I just went through the form now, to get to "new questions", and got an error message:

"Your response is too large. Try shortening some answers"

on page 3, even though I didn't change any of my answers!! (I just jumped to the bottom and chose "No, I wish to continue to the next section", so that I could get to questions I didn't respond to yet. My prior submissions worked and weren't "too large", and I didn't change them on page 3!

I reiterate the need for a longer time period, so that you can fix your forms (or replace it entirely with proper traditional email comment periods), and actually provide sufficient time to thoughtfully comment on this report.
I (and everyone else) shouldn't have to be fighting with this horrid interface. It doesn't even say or highlight *which* answer is too long! It's as though someone changed the limits in the background on the server side, and there's now a new **aggregate limit** somewhere.

Maybe Ariel did something? (I saw she was logged in, at the top right corner of the spreadsheet earlier)

Sincerely,

George Kirikos

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On Mon, Apr 27, 2020 at 11:32 AM George Kirikos wrote:

1 week isn't enough. I spent more than 20 hours already, and have only finished 20% to 25% of the forms. I've talked to others who are not going to comment at all, because it's just too long. That seems to have been the goal, to shut out public comments.

The co-chairs need to add substantially more time, like the 30 days that appeared to seek, with also a standard "traditional" comment period via email. I've blogged about just some of the problems on my website:

https://urldefense.proofpoint.com/v2/url?u=https-3A__freespeech.com_2020_04_27_icann-2Drpm-2Dpdp-2Dphase-2D1-2Dcomment-2Dperiod-2Dis-2Danother-2Dsham-2Dpart-2D4_&d=DwIFaQ&c=FmY1u3PJp6wrrcwll3mSVzgfkbPS56Jms7xcl4I5cM&r=0HadoWerBOd6z1JTSwDsel0ZFvfoFO7I MjEtzbac3o&m=kJx9TD3ITCe8oGdArDbgNOHxYfWZEeqZVXO5CtSQ4GB0&sf=KbGO6LXZW2tdtLuM3G-rU4e2ubcqMg2cdYCgkMe7uY&=e

Sincerely,

George Kirikos

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On Tue, Apr 21, 2020 at 9:58 PM Policy Staff wrote:

Hello George,

This is to let you know that per WG's request/decision, the public comment period for the RPM PDP Phase 1 Initial Report has been extended for one week. The public comment period will now close on 4 May 2020 at 23:59 UTC.

The public comment page has been updated according: https://urldefense.proofpoint.com/v2/url?u=https-3A__www.icann.org_public-2Dcomments_rpm-2Dinitial-2Dreport-2D2020-2D2020-2D2020-2D218-2D2En&d=DwIFaQ&c=FmY1u3PJp6wrrcwll3mSVzgfkbPS56Jms7xcl4I5cM&r=0HadoWerBOd6z1JTSwDsel0ZFvfoFO7I MjEtzbac3o&m=kJx9TD3ITCe8oGdArDbgNOHxYfWZEeqZVXO5CtSQ4GB0&sf=KbGO6LXZW2tdtLuM3G-rU4e2ubcqMg2cdYCgkMe7uY&=e
On 4/17/20, 10:05 AM, "George Kirikos" wrote:
I carefully reviewed the working group public mailing list for April 2020, and read no objections to my request for an extension: https://mm.icann.org/pipermail/gnso-rpm-wg/

Given there were no objections, please advise ASAP as to the new date.

Sincerely,
George Kirikos

On Wed, Apr 15, 2020 at 7:38 PM George Kirikos wrote:
> Do let the WG know that there's been a request, so that they can discuss extending the deadline (I've not seen any discussions on the public mailing list).
> Sincerely,
George Kirikos

On Wed, Apr 15, 2020 at 7:26 PM Policy Staff <policy-staff@icann.org> wrote:
> Hello George,
> Thanks for your email, and hope you are doing well/staying healthy.
> You can submit your longer comments via this Word doc version of the Google Form: https://urldefense.proofpoint.com/v2/url?u=https-3A__gnso.icann.org_en_issues_rpm-2Dinitial-2Dreport-2Dpublic-2Dcomment-2Dinput-2Dform-2D18mar20-2Den.docx&d=DwIFaQ&c=FmY1u3Pjp6wrcrwlI3mSVzgfkbPSS6sJms7xcl4I5cM&r=vDBvd4m-oE-cB-BSPKAA9wAXR-GX7-K_Fr1GGRMdZztherm=gflN0Gkpl6bkWm1hN15dPgyt1ChesiaoYjk2GY-x0&s=u18AZo6MO0WsErK-5HClNrlFyvNFi5dtH3K7AtuTv4&e=. Staff will then insert your comments into the Google Spreadsheet in a consistent manner and clearly link your comments to the specific sections (e.g., preliminary recommendation, community question, individual proposal) of the report. Nevertheless, we strongly encourage you to keep your comments succinct as much as possible, so that the WG would be able to digest and debilitate on them efficiently and effectively.
We have noted your extension request, but it would be a decision for the WG to make. Should the WG decide to extend the public comment period, the public comment page will be updated and a notification will go out.

Best Regards,
ICANN Policy Staff

On 4/15/20, 6:16 PM, "George Kirikos" wrote:

Just following up on Monday's email, as I've not heard back from anyone.

Sincerely,
George Kirikos

On Mon, Apr 13, 2020 at 4:06 PM George Kirikos wrote:

Hello,

According to the form:
"There is a limit of 2,000 characters (about 350-400 words) for each "comment box" question In the event you reach the character limit, you may send an email to policy-staff@icann.org, and the Working Group Support Staff will assist you and manually enter your responses."

I will almost certainly exceed that character limit for numerous comment boxes. Please advise how to submit longer comments.

Furthermore, I've spoken to a number of people who would like the deadline for submissions extended, given the current health crisis.

I'd like to formally request that this deadline be extended.

Sincerely,
George Kirikos