

<b>Translations: If translations will be provided please indicate the languages below:</b>									

## Report of Public Comments

<b>Title:</b>	<b>Consultation on ccTLD Delegation and Redelegation Performance Standards</b>								
<b>Publication Date:</b>	06 August 2013								
<b>Prepared By:</b>	Michelle Cotton								
<b>Comment Period:</b>					<b>Important Information Links</b>				
Open Date:	15 Jan 2013				<a href="#">Announcement</a>				
Close Date:	28 Feb 2013				<a href="#">Public Comment Box</a>				
Time (UTC):	23:59				<a href="#">View Comments Submitted</a>				
<b>Staff Contact:</b>	Michelle Cotton				<b>Email:</b>	michelle.cotton@icann.org			
<b>Section I: General Overview and Next Steps</b>									
<p>The comments received provided important feedback for performance standards proposed by ICANN for ccTLD delegations and redelegations. There were calls for specific reporting formats, which ICANN plans to accept, and the publication of data relating to ongoing delegation and redelegation requests. The proposed reports will provide data related to the delegation and redelegation requests respecting any confidential data submitted by requesters. Due to the conflicting input about performance metrics for timeliness, ICANN will produce 6 months of measures as a baseline and will then propose the performance targets for timeliness.</p>									
<b>Section II: Contributors</b>									
<p><i>At the time this report was prepared, a total of six (6) community submissions had been posted to the Forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.</i></p>									
<u>Organizations and Groups:</u>									
<b>Name</b>					<b>Submitted by</b>				
At-Large Advisory Committee (ALAC)					ICANN At-Large Staff				
Asia-Pacific Top Level Domain Association (APTLD)					Jian Zhang				
The Council of European National Top-Level Domain Registries (CENTR)					Peter Van Roste				
Country Code Names Supporting Organization (ccNSO)					Lesley Cowley				
<u>Individuals:</u>									

Name	Affiliation (if provided)
Michele Neylon	Blacknight Internet Solutions Ltd
Baasansuren Burmaa	MN Domain Registry, Datacom

### Section III: Summary of Comments

*General Disclaimer: This section is intended to broadly and comprehensively summarize the comments submitted to this Forum, but not to address every specific position stated by each contributor. Staff recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).*

The comments that ICANN received are summarized below in the relevant question.

#### **What are the key performance standards that would be meaningful for delivering the ccTLD delegation and redelegation?**

Timing and accuracy were considered to be reasonable performance standards. In particular, those who commented said they should be fully documented and publicly available to the extent possible. Communications and Transparency should also be included as key performance standards. For example having incident reports available and reporting on the response times to inquiries.

A common theme among the submissions was that it would be meaningful to categorize the performance standards for ccTLD delegations and redelegations between contested and non-contested requests. The comments also indicated that for ccTLD redelegations in particular, end-to-end time is not useful, especially when it is a contested request. Identifying when the request submission is deemed successfully submitted would be useful.

Commenters also mentioned that it would be appropriate to wait for the Framework of Interpretation Working Group (FOIWG) work to finish as the group will have recommendations on performance standards and other information related to ccTLD delegation and redelegation processes.

Focus on the effectiveness, efficiency, accountability and transparency of the involvement of the “Local Internet Community” and “Significantly Interested Parties” was also noted.

Measuring complaints would help with understanding “the stability and consumer confidence in a given ccTLD.”

**What do you consider KPIs for successful performance of the ccTLD delegation/redelegation service?**

Most of the Key Performance Indicators (KPIs) identified in the consultation are reasonable. Accuracy at 100% is an appropriate target for a performance indicator.

There were some different viewpoints with regards to KPI targets for ccTLD delegation and redelegation requests. It was suggested that for ccTLD redelegations, a one of a kind and/or elongated process within a specific request would skew the overall stats. There were suggestions that 60 days for those requests in normal/routine circumstances seems conservative and a better target would be 30 business days. There was understanding by the commenters that a longer period for hostile redelegations is expected.

Other comments suggested that setting strict timeliness KPIs for ccTLD redelegations/delegations is not ideal, as they do not want that to result in “rushed or suboptimal outcomes” or risk not being able to meet the performance standards.

Other suggestions included for processes not concluded within the monthly reporting cycle should be displayed to follow progress. Accuracy rates should be displayed along with errors and remediation of errors. Responses to the requester should be provided within five business days upon receiving a complete submission. In addition to KPIs, suggestions were made that it is more important to have a predictable process than a rapid resolution in making a ccTLD delegation or redelegation.

**In what formats would you like the results reported to the community?**

There was consensus in the comments received that presenting data on the website monthly is an acceptable method for reporting to the community. Along with the website and email communications, it was suggested that the ability to subscribe to alerts about delegation and redelegation requests and their status would be useful (while still respecting confidentiality). In addition to monthly data, improving the currently published data with the ability to drill down to get more specific information during all stages of the request and having the data exports was suggested.

Other suggestions included presenting at regional meetings, making full disclosure of relevant board discussions (minutes) available, and having a regular user satisfaction survey.

**Do you have additional input on suitable performance standards for the ccTLD delegation and redelegation service?**

Most all commenters stressed the importance of having good user documentation and submitted suggestions. There was also a suggestion to have incident reports in general.

Related to the transparency performance standards for ccTLD delegations and redelegations, there was consensus in the comments received to publish basic information relating to pending delegation

and redelegations that are in process in order to provide an opportunity for public and “significantly interested parties” to provide reviews.

#### **Section IV: Analysis of Comments**

*General Disclaimer: This section is intended to provide an analysis and evaluation of the comments received along with explanations regarding the basis for any recommendations provided within the analysis.*

ICANN acknowledges there is ongoing work within the FOIWG to provide guidance on how ccTLD delegations and redelegations are conducted. The timing of this consultation is in accordance with obligations under the IANA Functions Contract. ICANN expects that as we receive the completed FOIWG advice, and other guidance from interested and affected parties, it will spur future reviews of the procedures.

Based on the comments received it is clear that accuracy, timeliness and transparency are important KPIs. There is clear consensus that the accuracy target for ccTLD delegation and redelegation requests should be 100%. ICANN will continue to keep the 100% accuracy target as part of its performance standards and report any incidents (i.e. errors in root zone processing) to the community in a timely manner.

It is also clear that timeliness is important, however not as easy to set targets for due to the nature of the delegation and redelegation requests. ICANN will review the suggestions for categorizing delegation and redelegation requests and will suggest new appropriate targets for timeliness performance standards.

Related to the transparency performance standards for ccTLD delegations and redelegations, there was consensus in the comments received to publish basic information relating to pending delegation and redelegations in order to provide an opportunity for public review.

This consultation also received many comments about making sure there is comprehensive documentation on the requirements for ccTLD delegations and redelegations as well as a document of Frequently Asked Questions (FAQs). We understand the importance of making sure this information available. The topic of better documentation, including FAQs, will be covered in the User Instructions for ccTLD delegation and redelegations consultation targeted to be published in July 2013.