

# ICANN | SPECIFIC REVIEWS

## Competition, Consumer Trust, and Consumer Choice Review (CCT) – Accepted Recommendations – Plan for Implementation

### Status of This Document

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This plan for implementation was produced by ICANN org in accordance with resolution 2019.03.01.03 of the ICANN Board of Directors to accept, subject to costing and implementation considerations, recommendations 1, 17, 21, 22, 30 and 31 issued by the Competition, Consumer Trust, and Consumer Choice Review Team (CCT-RT).

### Preamble

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On 1 March 2019, the Board directed ICANN org to *develop and submit to the Board a plan for the implementation of the CCT accepted recommendations (1, 17, 21, 22, 30 and 31).*

*Resolved ([2019.03.01.03](#)), for the six recommendations that are specified as accepted in the Scorecard, the Board directs the ICANN President and CEO, or his designee(s), to develop and submit to the Board a plan for the implementation of the accepted recommendations. This plan should be completed and provided to the community for consideration no later than six months after this Board action. The ICANN President and CEO, or his designee(s), is directed to report back to the Board on the plan and any community input no later than nine (9) months after this Board action.*

This document sets out the approach for future implementation of accepted recommendations. A detailed implementation plan will be produced after ICANN Board directs the implementation work to begin. The plan will include details such as resource availability and scheduling, and will be supplemented with budget plans once implementation is underway.

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# 1. Introduction

The Competition, Consumer Trust, and Consumer Choice Review Team (CCT-RT) submitted its [Final Report and Recommendations](#) to the ICANN Board of Directors on 8 September 2018.

On 1 March 2019, the ICANN Board took action on the Final Recommendations produced by the Competition, Consumer Trust, and Consumer Choice Review Team (CCT-RT) [in resolution 2019.03.01.03](#). Per ICANN Bylaws, the ICANN Board carefully considered how to best address each of recommendation, and decided on three categories of action: accepted, pending, and passing through to different parts of the community, as documented in a [detailed scorecard](#) accompanying the Board resolution. The resolution accepted CCT recommendations 1, 17, 21, 22, 30, 31, subject to costing and implementation considerations, and directed ICANN org to develop and submit to the Board a plan for the implementation of the accepted recommendation.

The Board resolution called for the plan to be completed and provided to the community for consideration no later than six months after the Board action. Accordingly, the community is being asked to provide inputs on the plan for implementation of the accepted recommendations. Feedback is also being sought on the plan to include implementation of CCT recommendations in the FY21-FY25 Operating Planning and Budgeting Process, allowing for appropriate prioritization within the context of all ICANN work.

ICANN org will report back to the Board on the plan and any community input no later than December 2019, in accordance with Board resolution provisions. This will allow the Board to understand how the resources allocated to specific recommendations support ICANN in serving its Mission, and to understand the balance of resources and prioritization needed in order to fund the work identified to meet the CCT-RT recommendations.

This plan includes:

- An overview of implementation activities.
- Dependencies related to accepted recommendations need consideration, to ensure proper implementation in as well as forecasting of resources.
- Detailed plan for implementation for each approved recommendation. When relevant, this document identifies the need for broad or targeted community consultation when it is crucial to the success of subsequent steps.

Prior to releasing the plan for implementation, CCT-RT Implementation Shepherds<sup>1</sup> were invited to join the Board Caucus Group dedicated to CCT for an overview of the proposed path forward and plans to address the 1 March Board action on CCT Final Recommendations.

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<sup>1</sup> Former CCT-RT members who volunteered to provide clarifications, on an as-needed basis, on recommendations' intent, rationale, facts leading to conclusions, timeline, and measures of implementation. See <https://community.icann.org/display/CCT/Implementation+Shepherds> for more information.

## 2. Request for Input

ICANN Board directed ICANN org to develop a plan for implementation of the CCT-RT recommendations the Board resolved to accept on 1 March 2019. As indicated in the Board action, this plan for implementation (herein referred to as “plan for implementation”) contains information such as a description of the activities proposed, estimated duration, resource requirements (including funding source), dependencies, and other elements, where available and possible. As articulated in the Board resolution, the costing and implementation considerations are “needed in order for the Board to fully understand the resource and costing impact before committing to spend ICANN resources. These considerations will also contribute to an understanding of how the resources allocated to any specific recommendations (or suite of recommendations) support ICANN in serving its Mission and the public interest, including what projects or work need to be traded off within ICANN in order to fund the work identified to meet the CCT-RT recommendations”. In exercising its fiduciary duty, the Board intends to consider the proposed plan for implementation as well as community feedback received on the proposed path forward, and considerations specific to each recommendation.

To record community feedback on the proposed plan for implementation, feedback is solicited through a 40-day public comment proceeding. Community input is essential to determine whether the path suggested to implement the CCT-RT recommendation is reasonable in the context of the intent of CCT-RT.

### **Next Steps**

Additionally, community feedback is invited on the next steps. Once the community feedback on the plan for implementation documented through a public comment summary and adequately considered, the ICANN Board will direct ICANN org to produce a detailed implementation plan that results in the implementation of recommendations presented below, including any adjustments the input received through the public comment proceeding may potentially prompt. Implementation work, where no significant incremental costs and resources are needed will begin immediately thereafter. CCT recommendations that require significant resources and budget will be included into the FY21–25 operational planning and budgeting process, which – per the process in place and in accordance with ICANN’s accountability and transparency commitments – is submitted for public comment. The call for input on the FY21–25 Operational Plan and Financial Plan is planned for December 2019 and will allow the community to consider how the implementation of CCT recommendations fits into all other planned work, allowing for prioritization within the broader context.

### 3. Overview of Recommendations

On 1 March 2019, the Board accepted a total of six (6) recommendations: 1, 17, 21, 22, 30, 31 based on the following criteria:

- Consistency with ICANN's Mission
- Public interest
- Remit of ICANN Board

Details of Board action were specified within the scorecard titled, "[Final CCT Recommendations: Board Action \(1 March 2019\)](#)" ("[Scorecard](#)"). The specified Board action is incorporated into the proposed plan for implementation of each recommendation (see section 5 below).

For each of the six (6) accepted recommendations, Board acceptance was a first step toward implementation. As part of its fiduciary duty, the Board directed ICANN org to develop and submit to the Board a plan for the implementation of the accepted recommendations.

Recommendation	Directed to	CCT-RT Priority <sup>2</sup>
<b>Recommendation 1</b> - Formalize and promote ongoing data collection.	ICANN organization	High
<b>Recommendation 17</b> - ICANN should collect data about and publicize the chain of parties responsible for gTLD domain name registrations.	The ICANN Board, the GNSO Expedited PDP, the Registry Stakeholders Group, the Registrar Stakeholders Group, the Generic Names Supporting Organization, the Subsequent Procedures PDP WG, SSAC	High
<b>Recommendation 21</b> - Include more detailed information on the subject matter of complaints in ICANN publicly available compliance reports. Specifically, more precise data on the subject matter of complaints, particularly: (1) the class/type of abuse; (2) the gTLD that is target of the abuse; (3) the safeguard that is at risk; (4) an indication of whether complaints relate to the protection of sensitive health or financial information; (5) what type of contractual breach is being complained of; and (6) resolution status of the complaints, including action details. These details would assist future review teams in their assessment of these safeguards.	ICANN organization	High
<b>Recommendation 22</b> - Initiate engagement with relevant stakeholders to determine what best practices are being implemented to offer reasonable and appropriate security measures commensurate with the offering of services that involve the gathering of sensitive health and financial information. Such a discussion could include identifying what falls within the categories of "sensitive health and financial information" and what metrics could be used to measure compliance with this safeguard.	ICANN organization	High
<b>Recommendation 30</b> - Expand and improve outreach into the Global South.	ICANN organization	Prerequisite
<b>Recommendation 31</b> - The ICANN organization to coordinate the pro bono assistance program.	ICANN organization	Prerequisite

<sup>2</sup> CCT-RT priority labels include: Prerequisite: Must be implemented prior to the launch of subsequent procedures for new gTLDs; High: Must be implemented within 18 months of the issuance of a final report; Medium priority: Must be implemented within 36 months of the issuance of a final report; Low: Must be implemented prior to the start of the next CCT Review.

## 4. Dependencies

Dependencies impact scheduling, resourcing and implementation, and it is critical to understand these impacts as we move toward implementation of the approved recommendations. Throughout this plan, you will see several repeating dependencies, including:

- The need for community input and consultation: successful implementation can depend on the willingness and availability of stakeholders to participate in these consultations.
- Overlap with the New gTLD Subsequent Procedures Policy Development Process (PDP) Working Group (WG), which is “tasked with calling upon the community’s collective experiences from the 2012 New gTLD Program round to determine what, if any changes may need to be made to the existing Introduction of New Generic Top-Level Domains policy recommendations from 8 August 2007.” In fact, a number of recommendations were passed through to the Generic Names Supporting Organization (GNSO) PDP WG, as documented in the [scorecard](#) accompanying the Board resolution on the CCT-RT Final Report.
- A reliance on third party vendors’ progress on meeting objectives (e.g. recommendation 1).

In some instances, planning of implementation activities needs to accommodate a chain of dependencies. For instance, recommendation 30 (Expand and improve outreach into the Global South) is tied to the timing of a subsequent round for gTLDs and related communications planning, which in turn are tied to the community work the New gTLD Subsequent Procedures PDP WG is shouldering. Definitional work tied to a cross-community effort, coupled with potential engagement related recommendations emerging from policy work and Specific Reviews (Registration Directory Service Review and Security, Stability, and Resiliency of the Domain Name System Review) that are running simultaneously, all need to be navigated for successful implementation of recommendation 30.

Another example is community initiatives to begin a dialogue on reaching a common community understanding of DNS Abuse, and subsequent terms relative to DNS Abuse, create a contingency for the portion of recommendation 21 relating to “the gTLD that is target of the abuse”, and Board direction “to investigate the potential negative impacts of implementing this item on enforcement of compliance, track this effort and propose a mitigation plan in case of any negative effects.” It is crucial that results of this dialogue be taken into conversation to inform subsequent work.

The dependencies are described in more detail in the sections below.

## 5. Proposed Plan for Implementation

Recommendation 1 - Formalize and promote ongoing data collection.	
<b>Board Action</b>	<p>“Accept the premise of this recommendation, as ICANN continues to be more focused on data collection to support the community’s and its work, which necessitates the centralization of data collection. The Board understands the concerns raised by the CCT Review Team about having access to data. As such, the Board requests ICANN org to prepare a framework of data elements to be discussed with the community in relation to the group of data collection recommendations, and respecting the bandwidth of the community, consider appropriate timing and prioritization. The outcome of this work will inform Board’s action on the other recommendations focusing on data collection (recommendations 6, 7, 8, 11, 13, 16, 20, 23, 24, and 26).”</p>
<b>ICANN org Analysis &amp; Scope</b>	<p>In its report, the CCT-RT provided additional detail on the recommendation, noting that: “In an effort to promote more objective policy development inside ICANN, the ICANN organization should establish a formal initiative, perhaps including a dedicated data scientist, to facilitate quantitative analysis of policy initiatives and reviews by staff, contractors, and the community. Specifically, where possible, the ICANN organization should proactively collect data needed to validate or invalidate policy initiatives (whether ICANN organization-or community-driven), identify and collect data necessary to measure program success, both incrementally and in retrospect. On a case-by-case basis, this initiative would help to ascertain the cost/benefit and security requirements for the data in question.”</p> <p>The CCT-RT recommendation provides for flexibility in defining the form of implementation. The scope of envisioned implementation activities for this recommendation centers around a data functions model and includes:</p> <ul style="list-style-type: none"> <li>• Definition of the model</li> <li>• Planning for implementation of the model</li> <li>• Implementation of the model</li> <li>• Launch of the model</li> <li>• Management and evolution of the model</li> </ul> <p>Implementation is anticipated to be an extended process involving extensive stakeholder consultation to define the requirements, which can then be implemented in line with agreed outcomes.</p> <p>It is important to note that this recommendation is focused on establishing the capabilities of ICANN org to support stakeholders with data collection and related activities, considered in this analysis as an initiative with distinct objectives from those of populating the relevant functions with data sets. The community discussion on how ICANN org should formalize and promote data collection is independent of the discussion on whether to implement and how to prioritize any specific recommendation. In its acceptance of recommendation 1, the Board specified a framework of data elements to be discussed with the community in relation to specific CCT-RT data collection recommendations placed in a Pending status. In a separate track of work, ICANN org is currently gathering, organizing, and analyzing the information necessary to inform this community discussion. on these pending data collection recommendations.</p>
<b>CCT-RT Directed Recommendation to</b>	ICANN organization

## Description of Desired Outcome from CCT-RT Perspective

In performing its review, the CCT-RT endeavored to rely on as much objective research as possible and to base its findings on available data. In describing its first overarching recommendation, the CCT-RT envisioned a resourced mechanism to support data requests to inform future CCT reviews and to help inform assessments about the relative success of policy initiatives, so that application of quantitative data becomes a part of the ICANN community's policy development and review work: "In an effort to promote more objective policy development inside ICANN, the ICANN organization should establish a formal initiative, perhaps including a dedicated data scientist, to facilitate quantitative analysis of policy initiatives and reviews by staff, contractors, and the community. Specifically, where possible, the ICANN organization should proactively collect data needed to validate or invalidate policy initiatives (whether ICANN organization-or community-driven), identify and collect data necessary to measure program success, both incrementally and in retrospect. On a case-by-case basis, this initiative would help to ascertain the cost/benefit and security requirements for the data in question."

The CCT-RT notes that this initiative may include a data scientist, indicating a desire for qualified resources and expertise to support the community and ensure rigor in the methodologies used to collect, process, and present data.

As described in the CCT-RT Final Report, the outcome of implementing this recommendation would be a standard mechanism for data requests to be assessed for cost/benefit and to address any security considerations, indicating an expectation for a governance structure supporting requests for collection, analysis, and publication of data.

## Description of Implementation Activities

The objective of implementing this recommendation is to develop a model to guide and support data-collection activities. This model could be developed by ICANN org resources with community input, by engaging a third-party vendor, by ICANN org in collaboration with a dedicated community advisory group, or some combination of these.

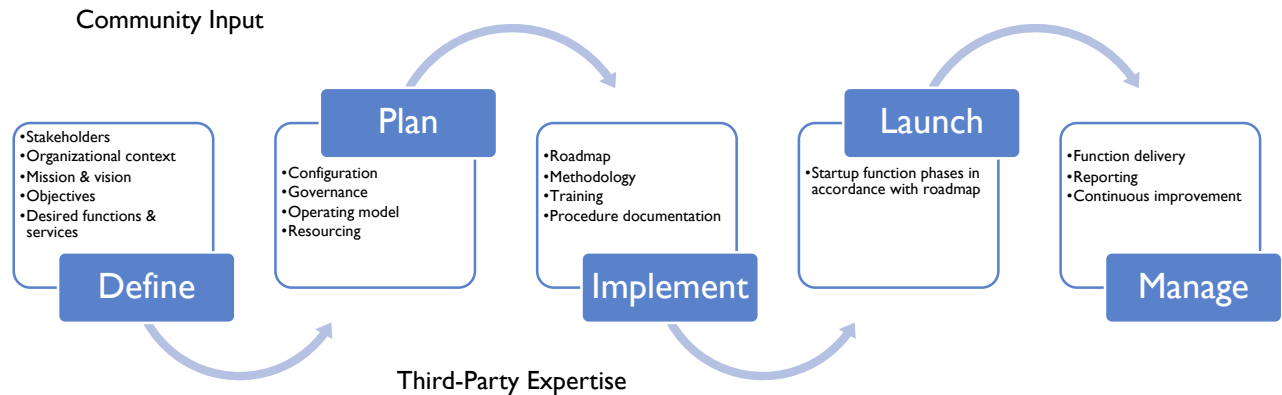
The optimal implementation approach incorporates the advantages of each, so that: 1) ICANN org provides project management, supports feasibility analysis and aligns with the ICANN multistakeholder model, 2) a third-party expert provides advice to support alignment with current data standards and best practices, and 3) the community provides assistance in developing requirements for a model that aligns with community working methods and needs.

Because this recommendation provides for an initiative to guides the mechanisms for ongoing data collection over the long term, implementation work would be organized as follows and depicted in the graphic below:

- **Definition** of the model
  - This includes identifying the mission, vision, and scope for the model including the organizational context and mandate, relevant stakeholder use cases, desired functions and services.
- **Planning** for implementation of the model
  - This includes creating the organizational structure, governance, resourcing, and operating assumptions for the model.
- **Implementation** of the model
  - This includes a roadmap with milestones leading to launch, such as development of procedures and education training activities.
- **Launch** of the model
  - This includes introduction of the initial function(s), which may include a phased introduction or pilot effort.
- **Management** and evolution of the model
  - This includes ongoing delivery of defined functions, reporting, and continuous improvement in line with stakeholder feedback.



## RECOMMENDATION I: FORMALIZE & PROMOTE ONGOING DATA COLLECTION



Community participation is particularly important in the definition and planning stages to gather the required perspectives, while third-party expertise is recommended, particularly in the planning and implementation stages, to draw on experience as well as existing best practices and standards for organizations that work with data.

### Deliverables/Milestones

Activity	Deliverable	Estimated Duration
Model definition	Initial requirements definition  This estimate is based on ICANN org preparation and publication of a white paper for community consultation, a public comment period or other mechanism for community review and feedback, analysis and incorporation of feedback received to create a recommended model.	20 weeks
Procurement process	Agreement with contractor (if applicable)  If undertaken, this could occur in parallel with other activities and is not counted separately in the total.	20 weeks
Implementation roadmap creation	Implementation roadmap  This estimate is based on drafting of an implementation plan also to be shared with the community for feedback. Time includes a feedback period and potential Board review and resolution on the plan to direct resourcing as needed.	13 weeks

Implementation and subsequent stages	The activities and duration will vary depending on the type of model arrived at via the previous stages	TBD
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Based on the outcomes of collaboration among ICANN org, the Board, and the community, it is expected that implementation of the recommended model would become a new project to be scoped and funded per a Board resolution or incorporated into the FY21–FY25 Operating Planning and Budgeting Process, allowing for appropriate prioritization within the context of all ICANN work. The duration and resources required to support ongoing operations would vary based on the relative complexity of the model.

**Dependencies**

There may be dependencies on third parties (e.g., community groups or third-party vendors) for certain deliverables, based on the implementation path. To enable progress on implementing this recommendation, the pending data-collection recommendations should not be a dependency.

It is also important to take into account and leverage existing work relevant to data collection for the organization, including the following:

- Open Data Program. The program goals are to a) increase transparency and improved accessibility and availability of data and b) strengthen ICANN org’s procedures, processes, and standards for higher data usability and reuse. This program includes an existing platform for publication of data.
- gTLD Marketplace Health Indicators. This set of statistics is published on a regular basis to track the evolution of the domain name marketplace in areas such as robustness, stability, and trust. A community advisory panel is working with ICANN org to develop and refine these indicators.
- Identifier Technology Health Indicators. This project involves metrics to measure the health of the system of unique identifiers the organization helps to coordinate. These include metrics about the level of abuse in domain names, supported by the Domain Abuse Activity Reporting (DAAR) project.

Based on the scope of the model developed to implement this recommendation, this effort may also be relevant to ongoing operational work that involves data collection, analysis, or reporting, such as Contractual Compliance, Global Domains Division (GDD), or Finance reporting.

**Issues & Other Considerations (i.e. Risks)**

To support alignment of the implementation of this recommendation with the CCT-RT’s goals and objectives, the plan should anticipate and support significant involvement of the CCT-RT Implementation Shepherds in the dialogue.

**One-Time Implementation Resources**

<b>Direct FTE</b>	GDD 1.0 FTE for 33 weeks with medium-level support from other departments. Other departments identified as participants in implementation of this recommendation , the Office of the Chief Technology Officer (OCTO), Legal, Policy, Communications and Global Stakeholder Engagement (GSE), will likely have additional costs for time in providing subject matter expertis.
<b>System Needs</b>	None for this phase.
<b>Third Party Cost</b>	Implementing this recommendation may involve external vendors or outsourced knowledge. Much of the work could be undertaken by ICANN org (for example, review and cataloging of current data frameworks and practices). However, use of professional services could help address challenges of bandwidth and expertise, as well as providing an independent perspective to the analysis and conclusions. Use of professional services to advise on some component(s) of the model may also be recommended as part of working with the community.
<b>Community Resources</b>	Community resources will include at least one public comment period and potentially an additional advisory group. No specific Supporting Organizations or Advisory Committees are targeted with the recommendation; however, it is expected that this may be of interest to

Supporting Organizations (SOs) and Advisory Committees (ACs) as well as Policy Development Process (PDP) working groups, review teams, cross-community working groups, and others.
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Travel would be incorporated into existing efforts (such as ICANN meetings or recurring stakeholder events). No dedicated travel is estimated at this time.

Note that the discussion in this section covers the estimated timeframes for model definition and planning stages. Costs for implementation and operation of the model once implemented are not included here but should be accounted for as part of the overall cost. Cost categories for an ongoing initiative include:

- Staffing, if applicable
- Data procurement costs
- Systems, software, and tools to support data collection, analysis, organization, storage, or visualization

#### **Other Functions to be Significantly Involved in the Implementation Work**

- Legal – Medium-level Effort (LOE) – providing legal support for the project, including legal compliance and best practices for data handling
- OCTO – High LOE – providing subject-matter expertise on DNS technical data and supporting feasibility discussions
- Compliance – Low LOE – providing subject-matter expertise
- gTLD Accounts & Services – High LOE – providing subject-matter expertise on gTLD agreements and services and industry trends
- Technical Services – High LOE – providing subject-matter expertise on data from ICANN org systems and supporting feasibility discussions
- Communications – Medium LOE – supporting external updates and communications on the project
- Policy Development Support – Medium LOE – providing subject-matter expertise on policy processes and liaison with policy groups
- GSE – Low LOE – supporting global/regional participation in dialogue

#### **Ongoing Resources (Annual)**

As described in the Scope and Analysis section above, the scope of work for implementing this recommendation is defined as working with the community to establish the desired model for data collection and related activities. Implementation of the agreed-upon model is considered a separate phase of work, and ongoing resources to support this model are dependent on the outcomes of these initial phases.

#### **Measures of Success**

The CCT-RT noted the success measure for this recommendation as: “The ability for the community to determine, through review process, if policy initiatives had well-defined issue measurement to justify reform and facilitate review.”

A successful implementation outcome for the first phase would be an approved and resourced implementation plan for a data functions model with multistakeholder community support.

**Recommendation 17 - ICANN should collect data about and publicize the chain of parties responsible for gTLD domain name registrations.**

<p><b>Board Action</b></p>	<p>“The Board notes that reseller information is already displayed within the publicly available WHOIS, reliant upon all contracted parties complying with ICANN Consensus Policies and contractual obligations to provide such data. To this extent, the recommendation is accepted. The Board notes, however, that the CCT-RT addressed this recommendation to a number of community groups. The Board notes that to the extent these groups may produce policy outcomes that impact this work, those will be taken into account when appropriate.”</p>
<p><b>ICANN org Analysis &amp; Scope</b></p>	<p>In its review, the CCT-RT found that “At present, there is no consistent mechanism for determining all of the ICANN-contracted and non-contracted operators associated with a gTLD domain name registration.” The report noted, for example, that the DNS Abuse Study “was unable to discern resellers from registrars to determine the degree to which DNS Security Abuse rates may be driven by specific-resellers, which in turn affects overall levels of DNS Security abuse.”</p> <p>The CCT-RT noted that “Thick WHOIS requirements do not mandate that resellers be listed in WHOIS records,” and proposes that “collecting and publicizing such information would enable end-users to readily determine the registry, registrar, and reseller associated with malicious domain name registrations. This would allow for more granular DNS abuse analysis as well as transparency for Internet users, thereby enhancing Community accountability efforts and Contractual Compliance enforcement.”</p> <p>The CCT-RT’s proposed success measure for this recommendation is that it is possible for anyone to readily determine the reseller associated with any gTLD registration.</p> <p>The Registry Registration Data Directory Services Consistent Labeling and Display Policy in effect as of August 2017 provides that the Reseller field is optional in response to domain name object queries, and that, if shown, the Reseller field must appear immediately before the "Domain Status" field and the value must be the name of the organization, in the case where the Reseller is a legal entity, or the name of a natural person.</p> <p>Per the Board action noted above, this recommendation has been implemented to the extent consistent with current policy requirements, and no further implementation work is planned by ICANN org at this time. Because the CCT-RT addressed this recommendation to a number of community groups, there may be future policy outcomes that impact this recommendation. To the extent that ongoing or future policy work conducted by the ICANN community may affect this assessment, ICANN org would review and report on the timing and scope of the implementation that may be needed accordingly.</p>
<p><b>CCT-RT Directed Recommendation to</b></p>	<p>The ICANN Board, the GNSO Expedited PDP, the Registry Stakeholders Group, the Registrar Stakeholders Group, the Generic Names Supporting Organization, the Subsequent Procedures PDP WG, SSAC.</p>

**Recommendation 21 - Include more detailed information on the subject matter of complaints in ICANN publicly available compliance reports. Specifically, more precise data on the subject matter of complaints, particularly: (1) the class/type of abuse; (2) the gTLD that is target of the abuse; (3) the safeguard that is at risk; (4) an indication of whether complaints relate to the protection of sensitive health or financial information; (5) what type of contractual breach is being complained of; and (6) resolution status of the complaints, including action details. These details would assist future review teams in their assessment of these safeguards.**

<b>Board Action</b>	“The Board accepts recommendation 21, noting that items (1), (3), (4) and (5) listed within this recommendation are already part of ICANN Contractual Compliance Department’s reporting process. In connection with item (2) of the recommendation relating to “the gTLD that is target of the abuse”, the Board directs ICANN org to investigate the potential negative impacts of implementing this item on enforcement of compliance, track this effort and propose a mitigation plan in case of any negative effects.”
<b>ICANN org Analysis &amp; Scope</b>	This recommendation calls for Contractual Compliance to publish reports regarding complaints received by ICANN Contractual Compliance. After review of the recommendation, Compliance published reports on Compliance webpages see Enhancing Transparency in Contractual Compliance Reporting - <a href="https://www.icann.org/news/blog/enhancing-transparency-in-contractual-compliance-reporting-en">https://www.icann.org/news/blog/enhancing-transparency-in-contractual-compliance-reporting-en</a> - relating to items (1), (3), (4) and (5) in recommendation 21 listed above. Compliance is currently working to publish item (6). However, item (2) requires further discussion within ICANN org as it requests to publish the Top Level Domain (TLD) of the domains being complained about.
<b>CCT-RT Directed Recommendation to</b>	ICANN organization

**Description of Desired Outcome from CCT-RT Perspective**

The CCT-RT considers recommendation 21 tied to recommendation 20 as they aim “to address whether the New gTLD Program safeguards, the mechanisms developed to implement them, and the outcomes of those implementations allow a reviewer to draw a definitive conclusion on their effectiveness and fitness to purpose.”

**Implementation Options (if Applicable) and Description of Implementation Activities**

See Deliverables/Milestones.

**Deliverables/Milestones**

<b>Activity</b>	<b>Deliverable</b>	<b>Estimated Duration</b>
1. Publish reports on monthly basis	Publish reports for items (1), (3), (4) and (5)	Completed
2. Provide link to reports published above in activity 1	Enhancing Transparency in Contractual Compliance Reporting - <a href="https://www.icann.org/news/blog/enhancing-transparency-in-contractual-compliance-reporting-en">https://www.icann.org/news/blog/enhancing-transparency-in-contractual-compliance-reporting-en</a> . This is the link to the published reports in activity 1.	Completed
3. To provide report on complaint resolution	Reports on Recommendation 21 item (6) to be included in Compliance reporting page. Link provided in activity 2.	2 months

details per item (6) of recommendation 21		
4. Determine if acceptable to publish TLD data as recommended in item (2)	See Issues & Other Considerations below.	To be determined

**Estimated Overall Duration**

Dependent on item 2. See Issues & Other Considerations below.

**Dependencies**

In item 2 of the recommendation relating to "the gTLD that is target of the abuse", the Board directs ICANN org to investigate the potential negative impacts of implementing this item on enforcement of compliance, track this effort and propose a mitigation plan in case of any negative effects. ICANN Contractual Compliance has the necessary data to publish. However, more discussion and alignment within the org and/or community is required on how to approach publishing such information.

ICANN org notes that in an effort to reach a common community understanding of DNS Abuse and subsequent terms relative to DNS Abuse, the Registries Stakeholder Group (RySG), Registrars Stakeholder Group (RrSG), Business Constituency (BC), Governmental Advisory Committee (GAC) and At-Large community have initiated a dialogue that will seek to provide a framework and definition for DNS Abuse. A cross-community plenary session is planned for ICANN66 in Montreal and it is anticipated that outcome of these discussions will serve to inform any subsequent policy work, as appropriate.

**Other functions to be significantly involved in the implementation work**

Opportunity to coordinate with GDD. See Issues & Other Considerations below.

**Implementation Options (if Applicable) and Description of Implementation Activities**

N/A

**Issues & Other Considerations (i.e. risks)**

On item 2, if we publish the TLD of each complaint, the Registry Operator would be known. This is similar to publication of Domain Abuse Activity Reporting (DAAR) data by TLD. Compliance has not published domain names or TLDs specifically in Compliance reports in the past.

Further investigation is needed before implementing this item, including possible consultation with the community. As indicated under dependencies, ICANN org notes that in an effort to reach a common community understanding of DNS Abuse and subsequent terms relative to DNS Abuse, the Registries Stakeholder Group (RySG), Registrars Stakeholder Group (RrSG), Business Constituency (BC), Governmental Advisory Committee (GAC) and At-Large community have initiated a dialogue that will seek to provide a framework and definition for DNS Abuse. This work will serve to inform any subsequent work and could also be a potential avenue for this discussion.

**Success Measures**

CCT-RT notes: "ICANN Contractual Compliance publication of a formatted report on abuse reports received and adjudicated, including, at minimum, all of the specified types and categories noted above.

**Recommendation 22 - Initiate engagement with relevant stakeholders to determine what best practices are being implemented to offer reasonable and appropriate security measures commensurate with the offering of services that involve the gathering of sensitive health and financial information. Such a discussion could include identifying what falls within the categories of “sensitive health and financial information” and what metrics could be used to measure compliance with this safeguard.**

<p><b>Board Action</b></p>	<p>“The Board directs ICANN org to initiate engagement within its existing budget, role, and work. The Board notes that while engagement can be initiated, it is unclear that ICANN org may have the ability to collect this data under the current contractual agreements and obligations.”</p>
<p><b>ICANN org Analysis &amp; Scope</b></p>	<p>The CCT-RT noted in its report that “protection of sensitive information, particularly sensitive financial and health information, is a high priority for Internet users. As a result, this recommendation aims at improving both complaint data regarding these issues and encouraging communications about best practices on how to protect these sensitive categories of information.”</p> <p>The recommendation asks that ICANN org engage with relevant stakeholders to understand best practices that are implemented to provide reasonable and appropriate security measures for any sensitive health and financial information that might be gathered in the offering of services. This will be a one-time effort that does not require resources to maintain ongoing data collection and analysis.</p> <p>Per the Board’s direction to ICANN org to “initiate engagement within its existing budget, role, and work,” ICANN org estimates that the implementation of this recommendation would entail utilizing minimal internal resources to identify and ask relevant stakeholders to share best practices being implemented to offer reasonable and appropriate security measures commensurate with the offering of services that involve the gathering of sensitive health and financial information. Such engagement is expected to utilize existing events such as ICANN meetings.</p>
<p><b>CCT-RT Directed Recommendation to</b></p>	<p>ICANN organization</p>

**Description of Desired Outcome from CCT-RT Perspective**

The GAC provided advice on requirements for registrants handling sensitive information, such as health or financial data, to “implement reasonable and appropriate security measures commensurate with the offering of those services, as defined by applicable law.” The CCT-RT was interested in the availability of data for future review teams to take into account on sensitive and regulated strings, as part of its analysis of the effectiveness of safeguards built into the New gTLD Program.

**Implementation Options (if Applicable) and Description of Implementation Activities**

Implementation of this recommendation is focused on engagement with stakeholders on a particular topic. Activities to support implementation of this recommendation include development of an engagement plan (including identification of the relevant stakeholders, opportunities and objectives, methodologies and requirements for data collection), executing the plan (which may include meetings and consultations in various forms), and providing the results to the Board for consideration of next steps.

## Deliverables/Milestones

Activity	Deliverable	Estimated Duration
Engagement Plan Development	Engagement Plan	10 weeks
Engagement Plan Execution	Engagement concluded	24 weeks
Board consideration	Board resolution	8 weeks

### Estimated Overall Duration

42 weeks

### Dependencies

There is a dependency on availability and participation of relevant stakeholders.

### Issues & Other Considerations (i.e. Risks)

This recommendation is particularly pertinent to GAC “category 1” strings, for which the registry agreement requires that “Registry operators will include a provision in their Registry-Registrar Agreements that requires Registrars to include in their Registration Agreements a provision requiring that registrants who collect and maintain sensitive health and financial data implement reasonable and appropriate security measures commensurate with the offering of those services, as defined by applicable law.”

It is important to note that the recommendation does not provide for collection of sensitive health or financial data by ICANN org; rather, information on best practices is sought to help future review teams and others understand the effectiveness of this provision.

### One-Time Implementation Resources

Per the Board’s direction, the implementation of this recommendation is expected to use existing budget and resources. The activities would leverage existing events such as ICANN meetings, and be incremental in nature so as to be able to accomplish this work within existing budget and resources.

### Other Functions to be Significantly Involved in the Implementation Work

- OCTO – High – supports outreach and subject matter expertise on engagement
- Contractual Compliance – helps guide engagement approach and discussions; integrates outcomes into Contractual Compliance work as relevant
- Legal – Medium – provides advice on engagement and legal considerations around sensitive data and best practices
- gTLD Account and Services – Medium – supports outreach and subject-matter expertise in industry matters

### Ongoing Resources (Annual)

In the event that metrics are established as a result of this effort, ongoing resources would be required to support measurement and delivery of such metrics. The resources required would be dependent on the parameters of any specific metrics established.



## Measures of Success

The CCT-RT's proposed measure of success was: "This recommendation would be successful if relevant stakeholders, including new gTLD registries and stakeholder groups representing the public interest, discuss what constitutes sensitive information and best practices regarding how to protect sensitive information. Such discussions could inform future policy in this area with a goal of increasing the public's trust of new gTLDs."

A successful implementation of this recommendation would be participation and receipt of input from a large enough sample to be able to call the input "best practices".

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**Recommendation 30 - Expand and improve outreach into the Global South.**

<p><b>Board Action</b></p>	<p>“The Board accepts the recommendation and directs ICANN org to provide the Board with a report on related engagement, noting that if the community wishes to have more resources dedicated to this activity, this should be addressed in the next budget cycle. Given the interdependency between this recommendation and recommendation 29, as both recommendations rely upon the undefined term “Global South”, the Board notes that the New gTLD Subsequent Procedures PDP WG could take on, should they choose to do so, defining the term “Global South” for this purpose in coordination with ICANN org, its engagement teams, and geographic regions definitions to create a workable definition, or agreeing on another term to describe underserved or underrepresented regions or stakeholders in coordination with ICANN org.”</p>
<p><b>ICANN org Analysis &amp; Scope</b></p>	<p>Note interdependency with Recommendation 29, which was passed through to the New gTLD Subsequent Procedures PDP Working Group (WG) and Generic Names Supporting Organization (GNSO). ICANN org functions have previously suggested in comments on the CCTRT the use of an alternate term for “global south”, which provides a geographic limitation on underserved and underrepresented stakeholders and regions. Some stakeholders view the term global south as not representative of their region and there are conflicting views on the use of this term outside of ICANN. The term uses a geographic descriptor rather than a social or economic one. The key aspect of implementation of this recommendation is that ICANN expand and improve engagement with diverse stakeholders and regions, who may not typically be aware of ICANN and the DNS ecosystem or as active in this work. ICANN org must show how engagement efforts to these stakeholders and regions raise awareness and inform them on opportunities to participate. The delivery of a report on engagement to underserved or underrepresented stakeholders is connected to the overall communications strategy associated with another gTLD round and is related to recommendation 29 (passed through to the GNSO). Ongoing engagement to diverse stakeholders and regions and cross-functional work continues ahead of the planning for another gTLD round. Underserved/underrepresented stakeholders and regions are already factored into regional GSE engagement strategies and these groups will be incorporated into the overall communications plan. There are also interdependencies with other community reviews such as Registration Directory Service Review (RDS-WHOIS2), Second Security, Stability, and Resiliency Review (SSR2), New gTLD Subsequent Procedures PDP WG, as those also have recommendations related to engagement.</p>
<p><b>CCT-RT Directed Recommendation to</b></p>	<p>ICANN organization</p>

**Description of Desired Outcome from CCT-RT Perspective**

The CCT-RT notes: “If increased applications from the Global South is determined to be an objective for a future round of applications, outreach to the Global South requires a more comprehensive program of conference participation, thought leader engagement, and traditional media. The work of AMGlobal should be built upon to identify targets, outlets, and venues for better outreach. This outreach should include cost projections, potential business models, and resources for further information. Furthermore, the review team recommends that the outreach program begin significantly earlier to facilitate internal decision-making by potential applicants.”

## Implementation Options and Description of Implementation Activities

Policy and GSE are working together to identify which underserved/underrepresented stakeholders and regions should be targeted in support of another gTLD round. From this exercise, Communications will develop a strategic communications plan to achieve the engagement objectives.

### Deliverables/Milestones

Activity	Deliverable	Estimated Duration
<b>Stakeholder Identification</b>	Identify diverse stakeholders and regions to target for communications and engagement related to another gTLD round	10 weeks
<b>Communications &amp; Engagement</b>	Communications & Engagement Plan for awareness on another gTLD round	Dependent on launch for communications effort and length of time for pre-round communications. Estimate 24-28 weeks.
<b>Report</b>	Preparation and delivery of engagement report	6 weeks. Dependent on timing of awareness-raising effort

### Description of Desired Outcome from CCT-RT Perspective

The CCT-RT wrote: “If increased applications from the Global South is determined to be an objective for a future round of applications, outreach to the Global South requires a more comprehensive program of conference participation, thought leader engagement, and traditional media. The work of AMGlobal should be built upon to identify targets, outlets, and venues for better outreach. This outreach should include cost projections, potential business models, and resources for further information. Furthermore, the review team recommends that the outreach program begin significantly earlier to facilitate internal decision-making by potential applicants.”

### Estimated Duration

The duration of the report depends on timing related to the overall communications period for another gTLD round, as it will likely cover the awareness-raising period for launch of the application process. This period will depend on the final product from the GNSO New gTLD Subsequent Procedures PDP WG.

### Dependencies

Dependencies for implementation of recommendation 30 are related to community work from the GNSO. Other dependencies include:

- Development of the overall communications strategy for a subsequent gTLD round based on decisions on which communities to target for awareness-raising
- Cross-functional agreement on an appropriate description for underserved/underrepresented stakeholders and regions
- The timing of another round for TLD applications
- The start of the subsequent round and related awareness-raising for ICANN Communications (supported by Global Stakeholder Engagement and Government Engagement teams)
- Interrelation with other reviews which include engagement-related recommendations

## Issues & Other Considerations (i.e. risks)

There are engagement-related recommendations in other reviews and other work such as RDS-WHOIS2, SSR2, New gTLD Subsequent Procedures PDP WG; and the interconnection with implementation of these recommendations will also have an impact on ICANN org resources, particularly GSE and Government Engagement. Headcount is needed to support this additional engagement overall, which is captured in the five-year operating plan.

## One-Time Implementation Resources

<b>Travel &amp; Engagement</b>	Associated ICANN org travel for engagement to awareness-raising for stakeholders and regions on next gTLD round	TBD
<b>Third Party Cost</b>	Engagement to media for underserved/underrepresented regions/stakeholders	
<b>Community Resources</b>		
<b>Total</b>		

There are costs to ICANN org to conduct engagement related to this recommendation to underserved/underrepresented stakeholders and regions which are not presently covered in the Global Stakeholder Engagement budget. Implementation is based on travel costs for engagement activities targeting diverse communities of participants in underserved/underrepresented regions and stakeholder groups, across the eight regions supported by Global Stakeholder Engagement. The costs are projected over a single fiscal year, from figures used to support the prior new gTLD round.

## Other functions to be significantly involved in implementation work

- GSE – High LOE – assistance in drafting definitions and terms; identifying stakeholders and regions; assembling data for report to Board on engagement; delivery of report
- Communications – High LOE – communications strategy for new gTLD program; messaging and materials associated awareness-raising for another gTLD round; support with engagement report
- Policy team – Medium LOE – Support in communicating with GNSO New gTLD Subsequent Procedures PDP WG on definition
- GDD – Low LOE – support in communicating appropriate messaging related to next round of gTLD applications

## Measures of Success

The CCT-RT define success as follows: “If increased applications from the Global South is determined to be an objective for a future round of applications, outreach to the Global South requires a more comprehensive program of conference participation, thought leader engagement, and traditional media. The work of AMGlobal should be built upon to identify targets, outlets, and venues for better outreach. This outreach should include cost projections, potential business models, and resources for further information. Furthermore, the review team recommends that the outreach program begin significantly earlier to facilitate internal decision-making by potential applicants.”

Successful implementation, per ICANN org, would unfold as follows:

- Identification of those stakeholders and regions not well represented and recognizing gaps
- Targeting and conducting engagement with identified communities and stakeholders.
- The delivery of the engagement report describing the engagement effort
- Report receives recognition from GNSO, other SO/AC groups & Board as a useful product.

Follow-up on report and awareness-raising efforts improves targeting of overall ICANN org engagement and attracts new active contributors to ICANN work.

**Recommendation 31 - The ICANN organization to coordinate the pro bono assistance program.**

<b>Board Action</b>	Accept contingent on the recommendation from the New gTLD Subsequent Procedures PDP WG that the pro bono assistance program continue.
<b>ICANN org Analysis &amp; Scope</b>	During the 2012 round of the New gTLD Program, the Applicant Support Program (ASP) assisted potential new gTLD applicants seeking both financial and non-financial support via the following mechanisms: Financial assistance in the form of new gTLD evaluation fee reduction; and coordination of pro bono services. The ICANN Board designated a budget of up to \$2 million USD for seed funding for applicant support. The New gTLD Subsequent Procedures PDP Working Group is reviewing the policy and implementation of the applicant support and the pro bono assistance program. Contingent on the recommendation from the New gTLD Subsequent Procedures PDP WG that the pro bono assistance program continues, ICANN org will continue to coordinate the pro bono assistance program per the recommendation. The detailed implementation plan for the pro bono assistance program will be constructed by ICANN org based on policy-level guidance from the New gTLD Subsequent Procedures PDP WG as part of the overall implementation plan for the next round of new gTLDs.
<b>CCT-RT Directed Recommendation to</b>	ICANN organization

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# Annex 1 - Background

Launched under the Affirmation of Commitments (AoC), the Competition, Consumer Trust and Consumer Choice (CCT) Review Team was formed in January 2016 to assess the effects of the New Generic Top-Level Domain (New gTLD) Program in three areas: competition, consumer trust, and consumer choice. The review also assessed the effectiveness of safeguards put in place to mitigate issues arising from the introduction of new gTLDs and the New gTLD Program's application and evaluation process.

The review, now included under ICANN Bylaws section 4.6 <https://www.icann.org/resources/pages/governance/bylaws-en/#article4.6>, examines the extent to which the New gTLD Program has promoted competition, consumer trust and consumer choice. The CCT analyzed both quantitative and qualitative data to produce recommendations for the ICANN Board to consider. Informed by multiple studies, research, and data gathering initiatives, as well as input from the ICANN community and ICANN Board, the CCT-RT released a final report on 8 September 2018 - <https://www.icann.org/en/system/files/files/cct-final-08sep18-en.pdf> on 8 September 2018.

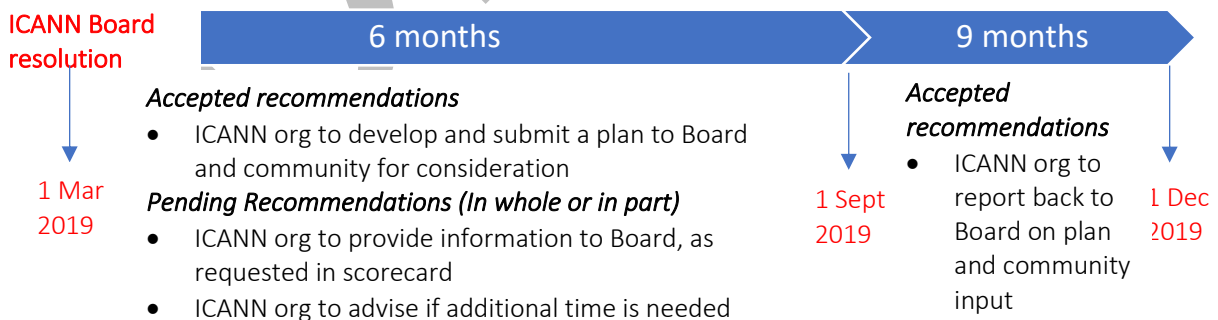
The report contains 35 full consensus recommendations, covering requests for more and better data collection, policy issues to be addressed by the community, and suggested reforms relating to transparency and data collection within ICANN Contractual Compliance.

As required by the ICANN Bylaws, the CCT-RT Final Report and Recommendations were published for public comment (<https://www.icann.org/public-comments/cct-final-recs-2018-10-08-en>) to inform Board action on the report. The summary of comments received on the Final Report (<https://www.icann.org/en/system/files/files/report-comments-cct-final-recs-01feb19-en.pdf>) highlighted divergences of opinion, including key concerns on the final recommendations and lack of community alignment on resource allocation.

Recognizing that the Board has the obligation and responsibility to plan and manage the work of ICANN org in order to preserve the ability for ICANN org to serve its mission and the public interest, the Board established three categories of action, as documented in the scorecard: <https://www.icann.org/en/system/files/files/resolutions-final-cct-recs-scorecard-01mar19-en.pdf>:

- Six recommendations were accepted (resolution 2019.03.01.03) subject to costing and implementation considerations. ICANN org was directed to *develop and submit to the Board a plan for the implementation of the accepted recommendations. This plan should be completed and provided to the community for consideration no later than six months after this Board action.*
- Seventeen recommendations (resolution 2019.03.01.04) were placed in pending status (in whole or in part), with a commitment to *take further action on these recommendations subsequent to the completion of intermediate steps as identified in the Scorecard.*
- Fourteen recommendations were passed through (in whole or in part) to community groups the CCT-RT identified for consideration. *In passing these recommendations through, the Board is neither accepting, nor rejecting the recommendations*

## Timeline Announced in 1 March 2019 Board Action on Competition, Consumer Trust and Consumer Choice Review



## Annex 2 - Methodology

ICANN org subject matter experts leading on topics of the six accepted recommendations were provided with a framework of areas to address. When possible, the subject matter experts endeavored to provide the information. A template was designed to address fields identified in the Board action as information the implementation should address.

Each recommendation includes sections for dependencies, information on who will implement the recommendations, resource requirements, resources needs, and proposed implementation steps.

- **Implementation Options and Description of Implementation Activities:** Describes the proposed service or function to be implemented to achieve the desired outcome, recognizing that these may be modified as additional information becomes available. Includes implementation options as applicable.
- **Dependencies:** lists other projects or activities which this recommendation is dependent on. These also could include studies, metrics, and data collection.
- **Who will implement** includes references to all functions at ICANN involved in implementation
- **Resources:** indicates the resources required to accomplish the recommendations. More precise financial information is not provided, but is expected to be produced in the implementation phase.

Multiple meetings were scheduled to ensure content for each recommendation accurately reflects input from all functions involved.