DRAFT Final Report: ccNSO Review Assessment & Recommendations

14 June 2019

Meridian Institute
Connecting People to Solve Problems

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Meridian Institute is a trusted third-party not-for-profit organization that helps people solve complex and controversial problems, make informed decisions, and implement solutions that improve lives, the economy, and the environment. As experts in multistakeholder processes, we design and manage collaboration, providing services such as facilitation, strategic planning, and research and analysis to inform decision-making. Drawing from over two decades of experience, we help people develop and implement solutions across a wide range of sectors, including science and technology, climate change and energy, agriculture and food systems, oceans and freshwater, forests, and health. As a neutral third-party, we bring people together to listen to one another, build trusted working relationships, and forge consensus.

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Acronyms

AC	Advisory Committee
AFTLD	Africa Top Level Domain Organization
ALAC	At-Large Advisory Committee
APTLD	Asia Pacific Top Level Domain Association
ccNSO	Country Code Name Supporting Organization
ccPDP	Country Code Policy-Development Process
ccTLD	Country Code Top-Level Domain
CCWG	Cross Community Working Group
CENTR	Council of European National Top-Level Domain Registries
COP	Community Onboarding Programme
DN	Domain Name
EC	Empowered Community
FOI	Framework of Interpretation
GAC	Governmental Advisory Committee
GNSO	Generic Name Supporting Organization
gTLD	Generic Top-Level Domain
IANA	Internet Assigned Numbers Authority
ICANN	Internet Corporation for Assigned Names and Numbers
IDN	Internationalized Domain Names
IFRT	IANA Function Review Team
LACTLD	Latin American and Caribbean ccTLDs Organization
MSSI	Multistakeholder Strategy and Strategic Initiatives
PTI	Public Technical Identifiers
RALO	Regional At-Large Organization
RWP	Review Working Party
SG	Stakeholder Group
SO	Supporting Organization
SOPC	Strategic and Operational Planning Standing Committee
SSAC	Security and Stability Advisory Committee
TechWG	Technical Information Gathering/Sharing Working Group

Executive Summary

This report presents the findings and draft recommendations of the second Country Code Names Supporting Organization (ccNSO) independent organizational review. The review assesses whether: 1) the ccNSO has a continuing purpose in the Internet Corporation for Assigned Names and Numbers (ICANN) structure; 2) whether changes in its structure or operations could improve its effectiveness; and 3) whether it is accountable to its constituencies, stakeholder groups, organizations, and other stakeholders.

The findings of this report were presented at ICANN64 in March 2019 to the broader ccNSO and ICANN communities. Their input, along with comments from the Review Working Party (RWP), were taken into consideration to revise and finalize the Assessment Report which has served as the basis for developing **recommendations** on continuous improvement in relation to the findings. In addition to recommendations, this report also contains **suggestions** from respondents that relate to the findings of our assessment. While suggestions are not necessarily specific, measurable, achievable, relevant, or time-limited (SMART), they are a reflection of what we heard from respondents. We have decided to publish suggestions in the spirit of continuous improvement to inform the ccNSO's ongoing work.

Meridian Institute, the Independent Examiner (IE), used a multi-modal approach to data collection and analysis to conduct the ccNSO review. This included conducting 45 targeted stakeholder semi-structured interviews with ccNSO members and participants as well as members of other Supporting Organizations (SOs), Advisory Committees (ACs), and bodies within the ICANN ecosystem. Data collection also included an online survey, which received 78 complete responses from 111 individuals. We also observed ccNSO Members Day meetings at ICANN63 and ICANN64, as well as a ccNSO Council meeting at ICANN64. Interview and survey data were fact-checked and supplemented through a document review process.

This report contains important findings from the ccNSO and surrounding community on how it fulfills its purpose, manages its structure and operations, and strives for accountability. Based upon the findings, our overall determination is that:

- the ccNSO has a strong continuing purpose;
- there does not seem to be a significant need to make structural or operational changes; and
- the ccNSO is accountable to its constituencies, including its members.

Within these categories, more nuanced findings are presented in detail regarding challenges the ccNSO faces in each area, the organization's strengths as perceived by its members, and how it fulfills its many roles and responsibilities. Where applicable, recommendations and suggestions are embedded in each section of the report as well as aggregated in Appendices 1 and 2. For easy accessibility, the recommendations are also included below.

List of Recommendations *(also in Appendix 1)*

CONTINUING PURPOSE

Finding: To address the findings regarding the ccNSO's ongoing continuing purpose, the ccNSO will need to involve next generation ccTLD managers and ensure that ccNSO work and meetings remain relevant.

> **Recommendation [1]:** The ccNSO should develop communications materials (including talking points) that clearly articulate the value of the ccNSO to potential new and current ccNSO members.

STRUCTURE & OPERATIONS – WORKING GROUPS AND COMMITTEES

Finding: There is an opportunity to better evaluate the merit of potential working group candidates in the event of more applicants than available spaces, thereby fostering more diverse participation and leadership.

> **Recommendation [2]:** the ccNSO Council should amend the "Information received from nominees" section of Annex B of the Guideline: ccNSO Working Groups to request that all applicants submit a short biography. The following Guideline section, "Initial selection of candidates" should be amended to indicate that biographies are anonymized by the ccNSO Secretariat before sharing with Councillors for a confidential ranking of candidates.

Finding: There is perceived lack of transparency and standardization around the selection process for Working Group members and Chairs.

> **Recommendation [3]:** the ccNSO should update Section 3.5 of the Guideline: ccNSO Working Groups to clearly articulate and standardize the process for nominating and appointing Working Group Chair(s).

Finding: The ccNSO's participation in the IANA Naming Function Review Team should not be impaired due to fluctuations in the number of ccNSO members and non-members.

> **Recommendation [4]:** the ccNSO should request a change in the Bylaws requirement for the IANA Naming Function Review Team, which requires two ccNSO members and one non-member. **NOTE:** This request was made to the ICANN Board[1] on 12 April 2019 and, as the IE, we concur. We recommend that the three seats on the IANA Naming Function Review Team be geographically diverse and membership-neutral.

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[1] Correspondence: Composition of the IANA Functions Review Team: proposed ICANN Bylaws change. (2019, April) Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/sataki-to-chalaby-12apr19-en.pdf

STRUCTURE & OPERATIONS – CCNSO COUNCIL

Finding: The number and diversity of people involved in the ccNSO Council could be improved.

> **Recommendation [5]:** the ccNSO should limit the number of consecutive terms a Councillor can serve. In regions with fewer members to draw upon and/or in the case of no willing volunteers seeking election, this requirement could be waived for that term. **NOTE:** a more restrictive version of this recommendation was made in the 2010 ccNSO Review that did not take into consideration diverse regional contexts which may prevent a region from cultivating new candidates. The recommendation was not adopted due to lack of feasibility across all regions.[2]

STRUCTURE & OPERATIONS – BARRIERS TO PARTICIPATION

Finding: It is important to engage a diversity of voices through varied, interactive meeting formats to enable participation from people who are not as comfortable standing up with a microphone in front of the membership.

> **Recommendation [6]:** the ccNSO Meetings Programme Committee should develop and adopt meeting formats to allow more varied interaction between participants at ICANN meetings (e.g., small regional group discussions followed by small group topical discussions). **Suggestion R** includes several ideas for implementing this recommendation.

Finding: The lack of real-time scribing of ccNSO Members Day meetings presents a barrier to participation for remote participants and non-native English speakers.

> **Recommendation [7]:** ICANN should provide real-time scribing of ccNSO Members Day meetings. As the Independent Examiner, we recognize that addressing this finding is outside of the ccNSO alone to remedy.

STRUCTURE & OPERATIONS – ORIENTATION AND ONBOARDING

Finding: Many respondents indicated that more could be done to enhance the orientation and onboarding of new and newer (< 2 years) ccNSO members as well as newly-elected leaders.

> **Recommendation [8]:** The written ccNSO course on the ICANN Learn portal should be translated into all ICANN languages.

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[2] Organizational Review of ICANN's Country Code Names Supporting Organization (ccNSO). Final Report. https://www.icann.org/en/system/files/files/items-ccnso-organisational-review-15jun10-en.pdf

Recommendation [9]: We recommend streamlining the mentorship program to more efficiently connect mentors and mentees. Recognizing the need for mentors may be greater than the availability of them, there may be efficiencies gained through group mentoring and/or dedicating face-to-face time at ICANN meetings for mentors and mentees to connect.

Recommendation [10]: Resources for newcomers (including multi-lingual ICANN Learn ccNSO portal materials) should be assembled into one location that is prominently featured and easily accessible on the ccNSO website.

ACCOUNTABILITY – ACCESSIBILITY AND TRANSPARENCY OF INFORMATION

Finding: Many of the findings related to accessibility and transparency of information are rooted in challenges with the current ccNSO website. As the Independent Examiner, we also experienced difficulty in trying to locate documents on the website for fact-checking. Lack of easy access to information also presents a barrier to participation.

Recommendation [11]: We recommend the ccNSO website should be redone as soon as possible. It is one of the more (if not the most) outdated SO/AC websites yet it is a key tool that supports accountability, transparent communication, and efficient operations.

ACCOUNTABILITY – ACCOUNTABILITY OF THE CCNSO COUNCIL

Finding: It appears that the inability to locate the appropriate Guideline for the recent ccNSO Vice-Chair election process stemmed from unclear file-naming and lack of consistent file storage and sharing.

Recommendation [12]: The ccNSO Secretariat, in collaboration with the ccNSO Council, should review the process for naming, filing, and uploading documents to the website to ensure a clear, transparent, and efficient process going forward. Standardizing information through templates, tagging, and automation could help improve the efficiency and transparency of information and accessibility.

Finding: The ccNSO Council does not always adhere to the ccNSO Council Practices Guideline with respect to publishing confirmed Council agendas seven days in advance of a Council meeting.

Recommendation [13]: The ccNSO Council should adhere to the ccNSO Council Practices Guideline. If the guidelines for Council agendas are too restrictive or impractical to follow, then the Guideline should be updated to reflect practices that are sustainable, keeping in mind members' interest in continued transparency and accountability.

ACCOUNTABILITY – INDEPENDENT REVIEWS

Finding: Considering the number of respondent statements that discussed the level of transparency of information being shared on various mailing lists, it would have been helpful to be able to independently verify this information in order to make more informed recommendations.

>   **Recommendation [14]:** We recommend that for future ccNSO reviews, the Independent Examiner have access to archived mailing lists for the period in review and/or be able to join as an observer to the mailing lists for the period of the review. **<u>NOTE:</u>** the Process Proposal for Streamlining Organizational Reviews[3] is currently out for public comment through 15 July 2019. This is an opportunity for the ccNSO to provide input to inform the organizational review process.

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[3] Process Proposal for Streamlining Organizational Reviews, Public Comment. See:
https://www.icann.org/public-comments/streamlining-org-reviews-proposal-2019-04-30-en

Introduction to the Review

Section 4.4 of the ICANN Bylaws mandates that an independent review of each Supporting Organization (SO) and Advisory Committee (AC) be conducted every five years. This is the second organizational review in the ccNSO's history. Due to the ccNSO's heavy workload, this review was deferred from its intended launch in August 2017.[4]

In accordance with the Bylaw review guidelines, this review assesses:
  (i)   whether [the ccNSO] has a continuing purpose in the ICANN structure;
  (ii)   if so, whether any change in structure or operations is desirable to improve [the ccNSO's] effectiveness; and
  (iii)   whether [the ccNSO] is accountable to its constituencies, stakeholder[5] groups, organizations and other stakeholders.

This draft Assessment and Recommendations Report is intended will be shared with the Review Working Party, the ccNSO, and the broader ICANN community for feedback through a presentation at ICANN65 and a 40-day public comment period in June 2019.

Methods

A multi-modal approach to data collection and analysis has been used to conduct the ccNSO review which includes the following methods:

1. Review of documentation related to the ccNSO's mission, functions, and operations
2. Review of documentation related to ccNSO processes and activities since the last ccNSO review
3. An online survey among existing and former ccNSO participants and members
4. Semi-structured interviews with a subset of former and existing ccNSO members and participants
5. Observations of ccNSO Members Day Meetings at ICANN63 and ICANN64 and one ccNSO Council meeting at ICANN64
6. Data validation
7. Regular reporting to the RWP

Throughout the process, we have ensured data validation for factual integrity through document review and regular reports to the Review Working Party (RWP). The RWP provided feedback on two versions of the draft report, preceding and following ICANN64, to help

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[4] Deferral of the Second Review of the Country Code Name Supporting Organization (ccNSO). (2017, September). Retrieved from https://features.icann.org/deferral-second-review-country-code-name-supporting-organization-ccnso.

[5] An individual, group or organization that has a direct or indirect interest or stake in a particular organization; that is, a given action has the ability to influence the organization's actions, decisions and policies to achieve results.

validate the findings in advance of the report's public release. The RWP's feedback and the IE's responses to those comments are available in Appendix 5.

Document Review

The following documents were carefully reviewed as part of the data analysis to assess the ccNSO's activities and processes against the stated mission, functions, operations, and processes provided in the documents.

- ICANN Bylaws
- ccNSO Rules of Procedure and Guidelines
- ccNSO statements and responses
- Working Group and Committee documents
- Letters to the ICANN Board of Directors (ICANN Board) and other SOs/ACs
- Previous draft and final reports from ccNSO reviews

Additional documents that relate to the ccNSO's function, structure, and operations have been reviewed throughout the data collection and analysis stages to validate information.

Interviews

Meridian conducted 45 targeted stakeholder semi-structured interviews[6] with ccNSO members and participants as well as members of other SOs, ACs, and bodies within the ICANN ecosystem. The rationale for this approach was to ensure the collection of ample, in-depth, qualitative data from diverse constituencies.

Thirty-nine structured, one-hour interviews were conducted at ICANN63 in Barcelona, Spain in October 2018. Six interviews were conducted in October and early November over the phone with individuals who did not attend ICANN63. Of these, 35% of respondents were female, 65% male (*Figure 1*). Regional breakdown had 33% of interview
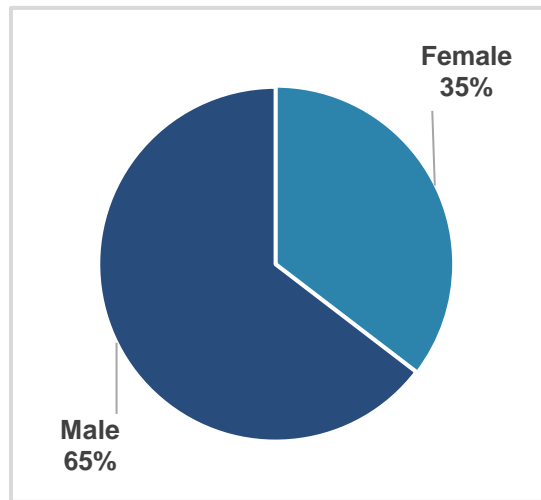

Figure 1. Interview respondents by gender. N=48

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[6] We interviewed 48 individuals total, as a few individuals chose to hold joint interviews with a colleague.

respondents from Europe; 25% from Asia Pacific; 15% from Africa; 15% from Latin America/Caribbean, and 12% from North America (*Figure 2*)

The Multistakeholder Strategy and Strategic Initiatives (MSSI) staff at ICANN was responsible for announcing and promoting interview opportunities. Primary means were through an announcement at icann.org and direct email outreach to all ICANN SO/AC/SG/C leaders, the ICANN Board, and ccNSO. All interview requests were granted. The breakdown of respondents by
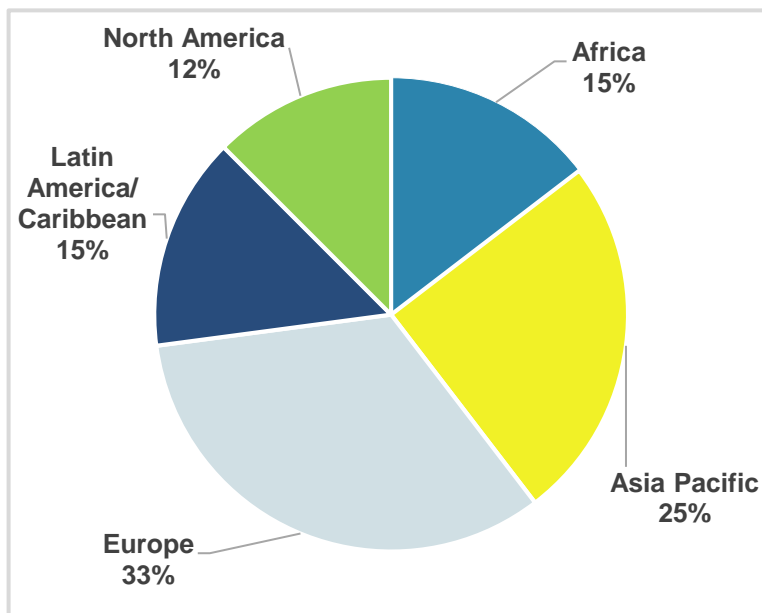
Figure 3. Interview respondents by region. N=48

Figure 2. Interview respondents by ICANN affiliation. N=48 (Interview respondents categorized by the ICANN affiliation(s) provided to the Independent Examiner by MSSI. Although individuals may fall into more than one category, they were only categorized by the affiliation(s) provided by MSSI).

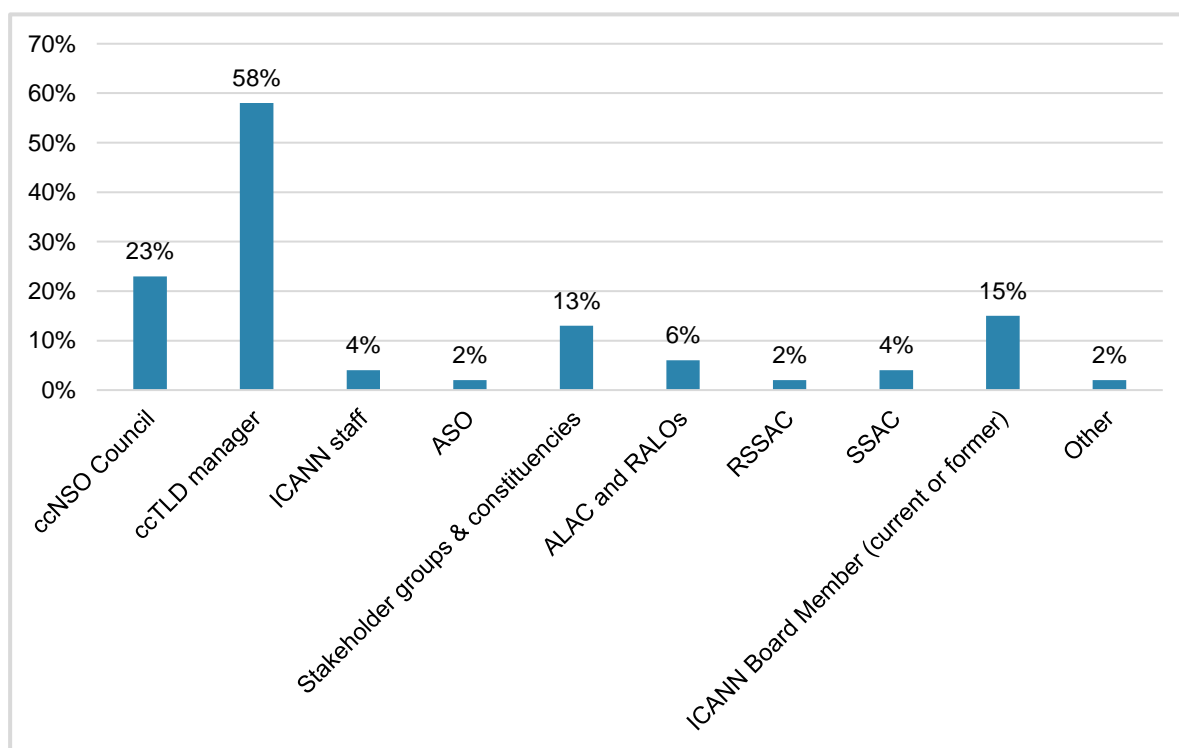affiliation is provided in *Figure 3* with Country Code Top-Level Domain (ccTLD) managers comprising 58% of interview respondents followed by 23% of respondents affiliated with the ccNSO Council.

Meridian Institute used Microsoft OneNote, a qualitative data analysis tool, to analyze interview data through open and axial coding. Data were categorized into main themes then further analyzed to identify core concepts. Observed emerging trends were used to develop survey questions, allowing Meridian to follow-up and gain deeper insight on interview data.

Online Survey

An online survey was conducted to capture a broader set of responses in addition to the interviews. The survey was open from 26 November 2018 to 11 January 2019 and received 78 complete responses from 111 respondents (a 70% completion rate). The survey was created on the online service SurveyMonkey; respondents were able to pause at any time during the survey and return to complete the questions later. Respondents could optionally provide their names, but all identifying information was kept confidential.

Similar to the announcements about interview opportunities, MSSI staff distributed the survey through announcements on icann.org, direct email outreach to the ccNSO and all ICANN SO/AC/SG/C leaders, and via social media.

The core survey was comprised of 16 questions. One additional question was posed to ccNSO participants (observers/non-members); two additional questions were posed to ccNSO members and ccNSO Councillors only; and three questions were posed to ccNSO members, ccNSO Councillors, and ccNSO participants (observers/non-members) only. Survey questions were both quantitative (employing a Likert scale) and qualitative, offering opportunities for respondents to provide narrative commentary. The survey questions were reviewed by RWP members to help ensure clarity of the instructions and questions.

The demographics of the survey results trended similarly to the interviews, with 35% female; 59% male, and 6% preferred not to say (*Figure 4*). By geographic region, 27% of respondents were from Europe; 23% from Latin America/Caribbean; 22% from Asia Pacific; 16% from North America; and 12% from Africa (*Figure 5*). In terms of respondent tenure in the ccNSO, 38% have been engaged for >10 years; 29% for 3-5 years; 19% for 0-2 years; and 14% for 6-9 years (*Figure 6*). In terms of affiliations, 35% of survey respondents identified as ccNSO members; 17% from stakeholder groups and constituencies; 14% from At-Large Advisory Committee
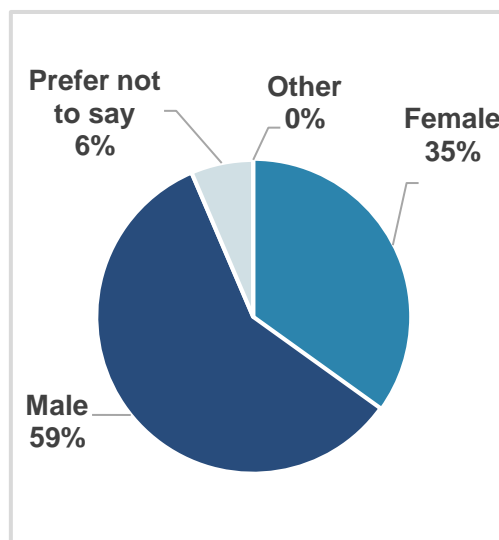
Figure 4. Survey respondents by gender. N=108

(ALAC) and Regional At-Large Organizations (RALOs); and 13% from the Governmental Advisory Committee (GAC) (see *Figure 7* for full breakdown).
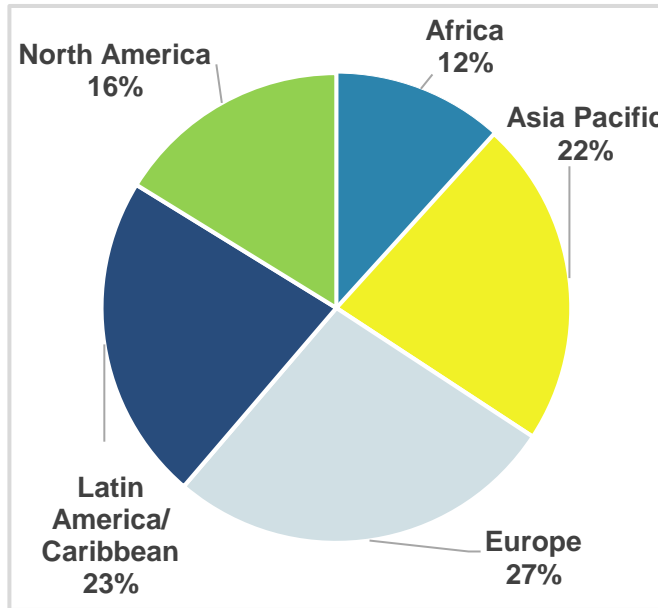
Figure 7. Survey respondents by region. N=111
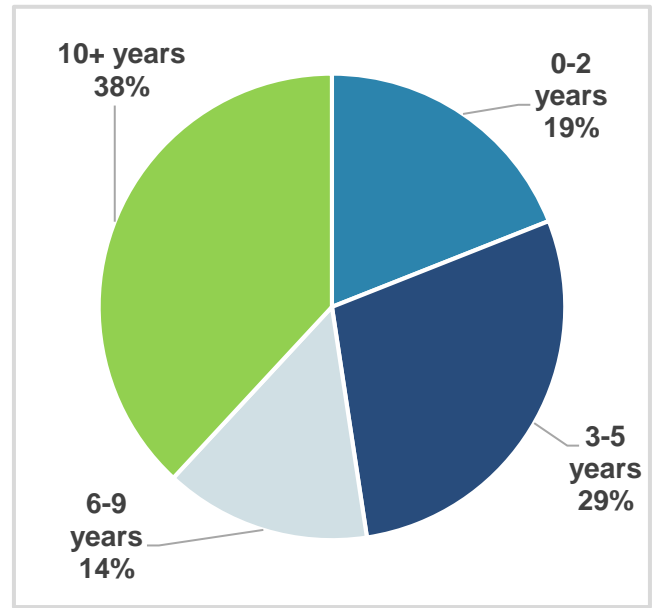
Figure 6. Survey respondents by length of participation in the ccNSO. N=42 (Question posed to ccNSO members and ccNSO Councillors only)
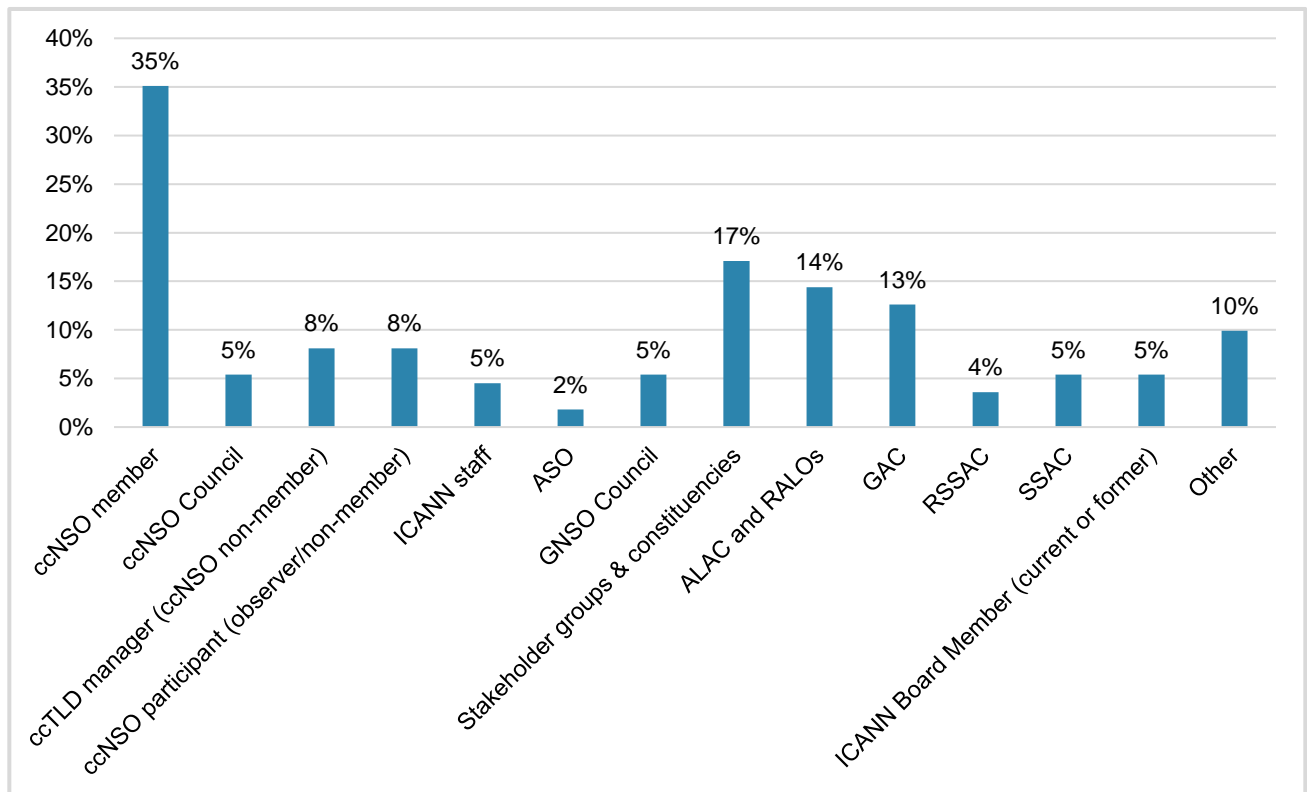
Figure 5. Survey respondents by ICANN affiliation. N=111 (respondents able to select more than one option)

Weighting Data

As discussed with the RWP prior to the development of the report, we relied primarily on survey data to provide a means to quantifiably validate findings from the qualitative interviews. Given the length of the survey and advice from the RWP to make more questions qualitative, we were limited in the number of interview topics and subtopics we could quantifiably validate. Consistent with our proposed methods for the review, we arrived at specific topics / themes, as well as sub-topics / sub-themes in the report, based on our coding and categorization process for qualitative interview data.

The subtopic categories outlined in the report are a result of coding interviews and categorizing data into similar themes. The themes are based upon multiple respondents' views and the nuanced differences of those views are characterized within each sub-section.

References to respondent statements and views are of course not indicative of consensus. There were wide ranging views even on topics of similar nature and respondents were unaware of others' views given the individual nature of interviews and surveys. However, where possible, we have provided a rough sense of how many respondents shared a particular view through the use of quantifier terms. Where only one person expressed a particular viewpoint, we have noted it as such.

Developing Recommendations & Suggestions

During the interviews and for many of the online survey questions, respondents were asked to share ideas and suggestions for addressing any areas they indicated as opportunities for continuous improvement. Therefore, the vast majority of ideas and suggestions contained in this report came directly from the ccNSO community and its constituents.

In this draft version of the Recommendations Report, we have classified actions for continuous improvement into two categories: recommendations and suggestions. Recommendations have a particular definition and status within the ICANN community and we wanted to indicate which continuous improvement actions fall under this category based upon our independent examination, fact-checking, and to the extent feasible, testing against SMART (specific, measurable, achievable, relevant, and time-limited) criteria. In addition, respondents shared many ideas for continuous improvement that did not readily translate into recommendations, however, they still hold value to share with the community. We have synthesized, fact-checked[7], and classified those as suggestions. As independent examiners we do not expect the ccNSO to readily commit to implementing suggestions, however, the independent review presents an opportunity to hold a mirror up to the community. In doing so,

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[7] There were a few instances where respondents put forth suggestions that are not feasible nor appropriate in the ccNSO context, according to our fact-checking. Those suggestions have been omitted from this report since we, as the IE, do not see merit in putting them forward for consideration.

there may be ideas that resonate and are further explored by the ccNSO in the spirit of continuous improvement.

Continuing Purpose of the ccNSO

Those who affirmed the ongoing value of the ccNSO identified four reasons for continuing purpose: that the ccNSO 1) brings added legitimacy to the ICANN community; 2) provides a platform for the country code community to participate in ICANN governance; 3) contributes to ICANN policy-development; and 4) helps to ensure the Internet continues to function properly

> *"The ccNSO is a collection of individuals who are doing the work and exchanging experiences to help each other out." — Interview respondent*

for and by country code operators, including for the IANA function. Findings related to each of these categories are explored below. Notably, although the ICANN Bylaws state that the ccNSO's primary purpose is to be a "policy-development body," the Bylaws note that the ccNSO "may also engage in other activities authorized by its members," such as "seeking to develop voluntary best practices for ccTLD managers, assisting in skills building within the global community of ccTLD managers, and enhancing operational and technical cooperation among ccTLD managers."[8]

The clear majority of interview and survey respondents affirmed that there is a continuing purpose for the ccNSO and pointed primarily to its value as a forum for cross-community/industry dialogue on a range of operational issues for country codes such as technical, legal, or commercial matters. As seen in *Figure 8*, 79% of survey respondents believe "Information sharing/cross learning" is the most important function and purpose of the ccNSO. "Policy development" was named by 68% of respondents, a second significant and well-recognized purpose of the ccNSO amongst its members.

The ccNSO also provides a platform for the ccTLD community[9] to actively participate in ICANN's multistakeholder governance model. Respondents shared their belief that the ccNSO makes it possible for coordinated and efficient dialogue between the ccTLD community and various ICANN constituencies, SOs, and ACs. By participating in the ccNSO, ccTLD managers work together to identify their community's top needs, interests, concerns, priorities, and recommendations so they may be communicated in a unified voice to other ICANN constituencies. If the ccNSO did not exist, some fear the importance of the ccTLD community – and understanding of their unique needs – compared to the Generic Top-Level Domain (gTLD) community may be forgotten.

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[8] ICANN Bylaws, Article 10, Section 10.1. (2018, June). Retrieved from
https://www.icann.org/resources/pages/governance/bylaws-en/#article10
[9] For purposes of this report, defined as the broad set of stakeholders that are involved in management, technical, and administrative support for ccTLDs.
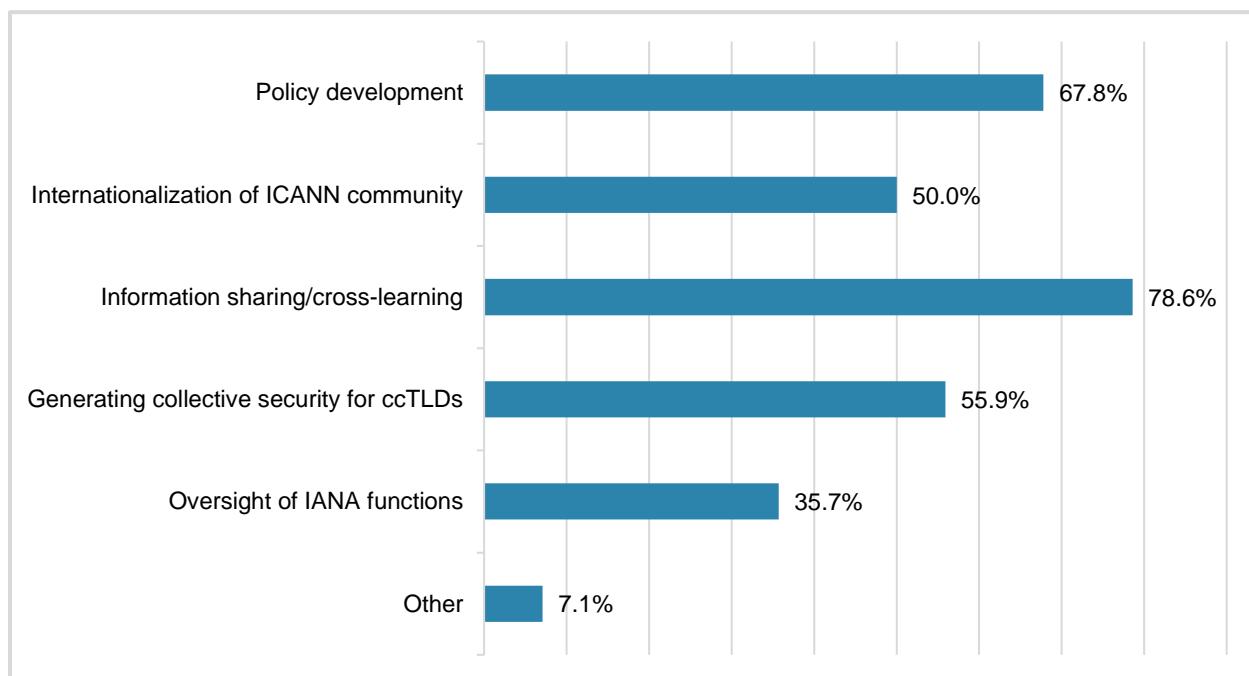
Figure 8. Survey Question: Which of the following functions and purposes of the ccNSO are most important from your experience and perspectives? N=84 (respondents able to select more than one option).

One individual stated there is no need for the ccNSO; and a handful of respondents raised questions about what additional value they receive from participating. There was acknowledgement among many respondents, including those who affirmed its value, that the ccNSO needs to more clearly articulate why people should prioritize participation in the ccNSO, particularly as a member as opposed to a non-member.[10] Even those who actively participate in the ccNSO expressed a need to clearly articulate the value of participation in order to convince or continue receiving support from superiors in their local communities and/or employers, given the time commitment required to participate in ICANN and the ccNSO. A few respondents thought the ccNSO should be more action-oriented when it comes to recruitment, but we acknowledge this depends ccTLDs as members to drive it.

Many respondents identified the ccNSO's principal vulnerability is lack of active contribution. Interviewees emphasized the need to improve engagement of newer and younger people given that most ccNSO participants have been involved for a long period of time—but again, this is dependent upon the ccTLD managers selecting newer or younger staff to engage in the ccNSO. Improved recruitment of new participants and/or younger participants would add varied perspectives and renewed energy to an organization that is challenged by volunteer fatigue.

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[10] Any ccTLD manager may participate in Working Groups and attend ccNSO meetings, regardless of membership status. Certain privileges, such as voting or nominating Council candidates, are limited to members only.
About. (2018). Retrieved from https://ccnso.icann.org/en/about.

Additional feedback on barriers to participation and areas for improvement regarding outreach and engagement are explored in the following sections.

> **Finding:** To address the findings regarding the ccNSO's ongoing continuing purpose, the ccNSO will need to involve next generation ccTLD managers and ensure that ccNSO work and meetings remain relevant.
>
> > **Recommendation [1]:** The ccNSO should develop communications materials (including talking points) that clearly articulate the value of the ccNSO to potential new and current ccNSO members.

ICANN Legitimacy

ICANN works to ensure the stable and secure operation of the Internet's unique identifier systems[11], of which country code domains are an important component. Voluntary participation of ccTLD managers in the ccNSO legitimizes ICANN as a global organization that strives to fulfill this mission. As one respondent said, without the participation of the ccTLD community, "ICANN would be a trade organization for contracted parties in the [Generic Name Supporting Organization] GNSO."

The ccNSO helps to uphold the multistakeholder model of ICANN that is built on open dialogue between constituencies. ICANN defines a Multistakeholder Model as,

> "an organizational framework or structure which adopts the multistakeholder process of governance or policy making, which aims to bring together the primary stakeholders such as businesses, civil society, governments, research institutions and non-government organizations to cooperate and participate in the dialogue, decision making and implementation of solutions to common problems or goals."[12]

Some respondents added that within their own country, they were viewed with increased legitimacy in their country code management because of their participation in a global body such as ICANN.

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[11] ICANN Bylaws, Article 1, Section 1.1(a). (2018, June). Retrieved from
https://www.icann.org/resources/pages/governance/bylaws-en/#article1.
[12] Multistakeholder Model. (2015, November). Retrieved from
https://icannwiki.org/Multistakeholder_Model.

Contributions to ICANN Governance

Many respondents described the ccNSO as a space for the ccTLD community to track and discuss decisions made by ICANN that could impact them, positively or negatively. ccNSO members participate in final votes regarding the recommendations of the ccNSO to the ICANN Board.[13] These recommendations pertain to policies concerning ccTLD operators, which elevates the needs of the ccTLD community to ICANN decision-makers. The ccNSO Council also nominates individuals to fill two seats on the ICANN Board.[14] In addition, the ccNSO is a Decisional Participant in the Empowered Community (EC), the mechanism under California law through which SOs and ACs can organize to legally enforce community powers and rules within ICANN.[15] As a Decisional Participant,[16] the ccNSO helps raise concerns regarding actions of the ICANN Board or organization and improve their accountability. A few respondents noted that there is a lack of understanding and engagement within the ccNSO membership regarding the organization's EC responsibilities. There was also a perception that the one EC Administration representative from each supporting organization[17] (including the ccNSO), ALAC, and GAC, constitutes a single point of failure for each SO/AC. While important to note the potential need for redundancy in communications sent to representatives of the EC Administration given the responsibility that rests upon each SO/AC's single representative, it is beyond the scope of the ccNSO to remedy as it involves the ICANN Bylaws.

Additional information regarding the ccNSO's participation in ICANN Governance mechanisms is provided in the section on Structure & Operations.

Suggestions:

> **[A]** Some respondents suggested more education is needed within the ccNSO community so that it is engaged in its responsibilities of the multi-stakeholder model, including the EC, which would also help better distribute the work.
>
> **[B]** It may be helpful to review whether there is a need for redundancy in communications to EC Administration representatives from each supporting organization.

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[13] Frequently Asked Questions, How can I influence ICANN policies through the ccNSO? (2018). Retrieved from https://ccnso.icann.org/en/about/faqs.htm#influence.

[14] ICANN Bylaws, Article 10, Section 10.3(i). (2018, June). Retrieved from https://www.icann.org/resources/pages/governance/bylaws-en/#article10.

[15] Empowered Community. (2019). Retrieved from https://www.icann.org/ec.

[16] Empowered Community Administration. (2019). Retrieved from https://www.icann.org/resources/pages/ec-administration-2017-05-25-en.

[17] Empowered Community Administration (2019). Retrieved from https://www.icann.org/resources/pages/ec-administration-2017-05-25-en.

Policy Development

By definition, the ccNSO is a policy-development body within ICANN.[18] This is a vital function for the ccNSO when it comes to developing policies on topics requiring global coordination, such as the matter of Internationalized Domain Names (IDNs), which was the topic of multiple former ccNSO Working Groups.[19] Any policy recommendations must fall within ICANN's mission and the ccNSO's policy scope, defined in Annex C of the ICANN Bylaws, and be based on public input and comment.[20]

Some respondents pointed out that despite what is written in the ICANN Bylaws regarding the ccNSO's policy-development mandate, policy-development is not a role that the ccNSO plays frequently given the sensitive relationship between country codes and ICANN: "ICANN does not have contract authority to take compliance action against ccTLD operators."[21] County code policies regarding registration, accreditation of registrars, and WHOIS are determined and managed within countries reflecting each nation's unique legal systems and cultural contexts.[22] This is quite different from ICANN's mandate regarding gTLDs, where ICANN is responsible for developing and implementing policies through a bottom-up, consensus-based multistakeholder process and gTLDs are required to adhere to ICANN policies through their contractual Registry Agreements with ICANN.[23] According to the Bylaws, the only ICANN policies that strictly apply to ccNSO members are those developed through the Country Code Policy-Development Process (ccPDP).[24]

Several respondents outside of the ccNSO suggested the ccNSO could play a stronger role in the ICANN policy-making process, even if it does not provide specific recommendations. However, as the IE, we did not find evidence this role is lacking.

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[18] ICANN Bylaws, Article 10, Section 10.1. (2018, June). Retrieved from
https://www.icann.org/resources/pages/governance/bylaws-en/#article10.
[19] ccNSO IDN PDP Working Group 1. (2018). Retrieved from
https://ccnso.icann.org/en/workinggroups/ipwg1.htm.
[20] ccNSO Policy Development and Implementation. (2018, February). Retrieved from
https://www.icann.org/en/system/files/files/ccnso-pdp-handbook-06mar18-en.pdf.
[21] About ccTLD Compliance. (2012, February). Retrieved from
https://www.icann.org/resources/pages/cctld-2012-02-25-en.
[22] About ccTLD Compliance. (2012, February). Retrieved from
https://www.icann.org/resources/pages/cctld-2012-02-25-en.
[23] ICANN Bylaws, Article 1. (2018, June). Retrieved from
https://www.icann.org/resources/pages/governance/bylaws-en/#article1.
Registry Agreement. (2014, January). Retrieved from
https://newgtlds.icann.org/sites/default/files/agreements/agreement-approved-09jan14-en.htm
[24] ICANN Bylaws, Article 10, Section 10.4(j). (2018, June). Retrieved from
https://www.icann.org/resources/pages/governance/bylaws-en/#article10.

Internet Functionality & Stability

Another identified primary purpose of the ccNSO is to help ICANN with Internet functionality for country codes. There are 249 ccTLDs, of which 172 are members of the ccNSO.[25] Having the ccNSO as a formally recognized framework for engagement between the ccTLDs is important for ICANN as an organization so that it may provide good customer service for a key stakeholder group in the Domain Name (DN) space. Respondents also shared that the ccNSO is important for ccTLD managers as it can help them better serve their local internet communities by ensuring that IANA functions are performed at a high standard and by providing a forum to share best practices and technical and policy information. Some respondents indicated that ccNSO members may be in a unique position to help inform ICANN of the changing legal landscapes within their countries with respect to internet functionality and stability.

IANA Functions

One respondent claimed that the "fundamental interface" between the ccNSO and ICANN is the Internet Assigned Numbers Authority (IANA); many respondents made similar comments. In addition to other responsibilities, IANA performs administrative and technical functions associated with root zone management, ensures consistent

> *"The fundamental interface between the ccNSO and ICANN is IANA." – Interview respondent*

protocols in the management of domain names, and processes assignment of ccTLDs in accordance with established policies.[26] Notably, membership in the ccNSO is not a condition for accessing IANA services.[27] However, the ccNSO has advised ICANN on IANA-related policies and functions relevant to the ccTLD community. For example, the ccNSO participated in the Cross Community Working Group (CCWG) to develop an IANA Stewardship Transition Proposal on Naming Related Functions when the IANA functions transferred from its historical contract with the United States Government to ICANN's stewardship (through affiliate Public

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[25] It is worth noting that most ccTLD managers are not persons but legal entities (e.g., academic institutions, non-profit organizations, government agencies, etc.). The total number of ccTLDs is comprised of ISO 3166 ccTLDs and internationalized (IDN) ccTLDs. Under the current ICANN Bylaws, however, IDN ccTLD Managers cannot become members of the ccNSO.
In some cases, the same entity operates more than one ccTLD (and sometimes both an ISO 3166 ccTLD and an IDN ccTLD). Therefore, although there are officially 249 ccTLDs, the number of entities worldwide that are ccTLD Managers is smaller.
ICANN Geographic Regions. (2019, January). Retrieved from https://meetings.icann.org/en/regions, and https://ccnso.icann.org/en/about/members.htm.
[26] Cross Community Working Group (CWG) Charter. (2014, August). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_46247/draft-charter-ccwg-iana-stewardship-21aug14-en.pdf.
[27] ICANN Bylaws, Article 10, Section 10.4(c). (2018, June). Retrieved from https://www.icann.org/resources/pages/governance/bylaws-en#IX.

Technical Identifiers (PTI)) in 2016.[28] Previously, the ccNSO developed a Framework of Interpretation (FOI) to provide guidance regarding issues of delegation, transfer, and retirement of ccTLDs where no clear policy existed.

The ccNSO also serves in an oversight capacity to IANA and PTI. The ccNSO currently appoints two ccTLD Registry Operators to the Customer Standing Committee (CSC), which is responsible for ensuring the naming functions of IANA are well-performed; monitoring PTI's performance of the IANA naming function; and undertaking remedial action to address poor performance if necessary.[29] According to the Charter, the Technical Information Gathering/Sharing Working Group (TechWG) also provides a forum for the ccNSO to monitor and give feedback to IANA on its services, in addition to providing information to the ccNSO and ccTLDs on issues relevant to IANA and facilitating discussions within the ccNSO on issues relating to IANA.[30] However, ccNSO members noted that, in practice, the TechWG no longer engages in these IANA-related activities; the CSC is the primary interface between the ccNSO and IANA.

Technical and Security Support

Through a variety of working groups and platforms, the ccNSO provides the ccTLD community with advice and shares information on technical and operational aspects of managing a ccTLD.[31] A commonly-mentioned opportunity for such information exchange is Tech Day, a technical, cross-community workshop ICANN meetings organized by the TechWG at which experienced and new people "meet, present and discuss technical topics related to registry and DNS work and security."[32] While most respondents that spoke of Tech Day and the technical presentations provided during ccNSO meetings had positive views, there was a minority perspective shared that the presentations and sessions are not all that useful.

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[28] Cross-Community Working Group to Develop an IANA Stewardship Transition Proposal on Naming Related Functions. (2018). Retrieved from https://ccnso.icann.org/en/workinggroups/iana-stewardship-naming.htm.
IANA Functions Stewardship Transition. (2016). Retrieved from https://icannwiki.org/IANA_Functions_Stewardship_Transition.
Public Technical Identifiers (PTI). (n.d.). Retrieved from https://pti.icann.org/.
[29] Amended Charter of the Customer Standing Committee (CSC). (2018, June 27). Retrieved from https://www.icann.org/en/system/files/files/csc-charter-amended-27jun18-en.pdf
[30] Charter, ccNSO Working Group, 2009-10-28. (2009, October). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_11148/tech-wg-charter-28oct09-en.pdf.
[31] ccNSO Technical Working Group. (2018). Retrieved from https://ccnso.icann.org/en/workinggroups/techwg.htm.
[32] Call for Presentations-Tech Day at ICANN63. (2018, August). Retrieved from https://ccnso.icann.org/en/announcements/announcement-21aug18-en.

The ccNSO has devoted considerable time working to identify problems and solutions for specific technical matters. The ccNSO Secretariat provides administrative support for a Standing Committee of TLD-OPS, "an incident response community for and by ccTLDs and brings together people who are responsible for the operational security and stability of their ccTLD."[33] TLD-OPS includes more than 65% of all ccTLDs[34] and, through its Standing Committee, is fully governed by the ccTLD community. The Committee consists of ccTLD managers and liaisons from additional ICANN constituencies including the Security and Stability Advisory Committee (SSAC), IANA, and ICANN's security team.[35] Through TLD-OPS, ccTLD managers have run workshops on specific security topics like disaster recovery and emergency response, and the group maintains an electronic mailing list. A few interviewees applauded the group and the information it shares as one of the most valuable new components of the ccNSO (TLD-OPS was chartered in September 2017).

> *"Sharing knowledge and information is more than just "important." It is critical to building stability in the Internet by communicating, collaborating, and even building consensus on how we can improve and do things well."*
> *– Survey respondent*

Suggestions:

[C] Spam is an increasing problem that is not gaining enough attention. Since spam is a content and context specific problem, this could be a topic to foster sharing of ccTLD knowledge and best practices.

[D] Other SO/ACs would benefit from hearing ccNSO member experience and advice on how they address issues of privacy and security *(see Community of Practice & Knowledge Exchange)*

Community of Practice & Knowledge Exchange

The majority of respondents acknowledged the importance of the ccNSO in providing a peer-to-peer forum for the ccTLD community to share experiences, knowledge, and best practices. The value of this function for members is evidenced by the survey question "Why did you join the

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[33] TLD-OPS: ccTLD Security and Stability Together. (2018). Retrieved from https://ccnso.icann.org/en/resources/tld-ops-secure-communication.htm.

[34] See Footnote 20 for further information regarding the number of ccTLDs and ccTLD managers.

[35] TLD-OPS: ccTLD Security and Stability Together. (2018). Retrieved from https://ccnso.icann.org/en/resources/tld-ops-secure-communication.htm.

ccNSO?," for which the three most common responses were "Opportunity to network/build relationships;" "To learn about the ccNSO or about ccTLD management;" and "Opportunity to learn new skills/management approaches for ccTLDs" (*Figure 9*). In interviews, members described the value of being part of a diverse community of ccTLD operators from around the world, from small to large ccTLDs and from those with a long history of ccTLD management to newer registry operators. Through the relationships and platform that the ccNSO provides, members can collaboratively improve their technical and management capacities and better respond to developments in the industry.
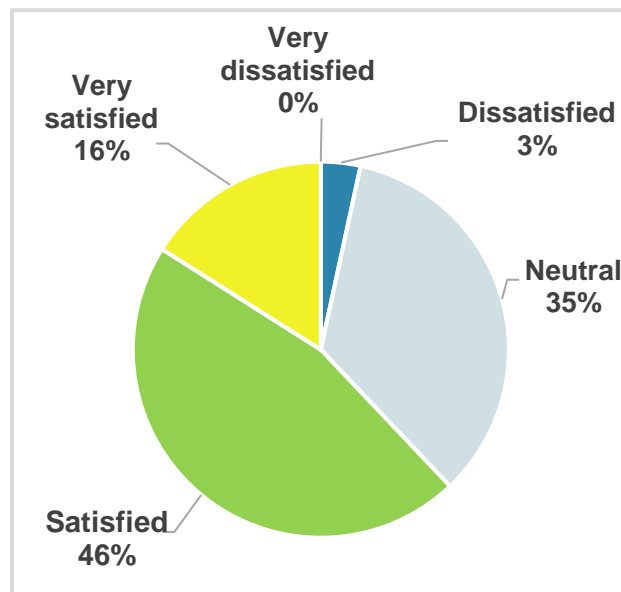
Figure 9. Survey Question: To what extent are you satisfied with how the ccNSO facilitates information and knowledge exchange? N=87

Sixty-two percent of survey respondents were "Very satisfied" or "Satisfied" with how the ccNSO facilitates information and knowledge exchange (*Figure 10*). Although interviewees overwhelmingly praised these functions as well, some noted that most knowledge exchange currently happens infrequently and on an ad hoc, interpersonal basis and wished the ccNSO provided more formal platforms. Even though the ccNSO cannot impose guidelines for ccTLD management, interviewees emphasized that it can
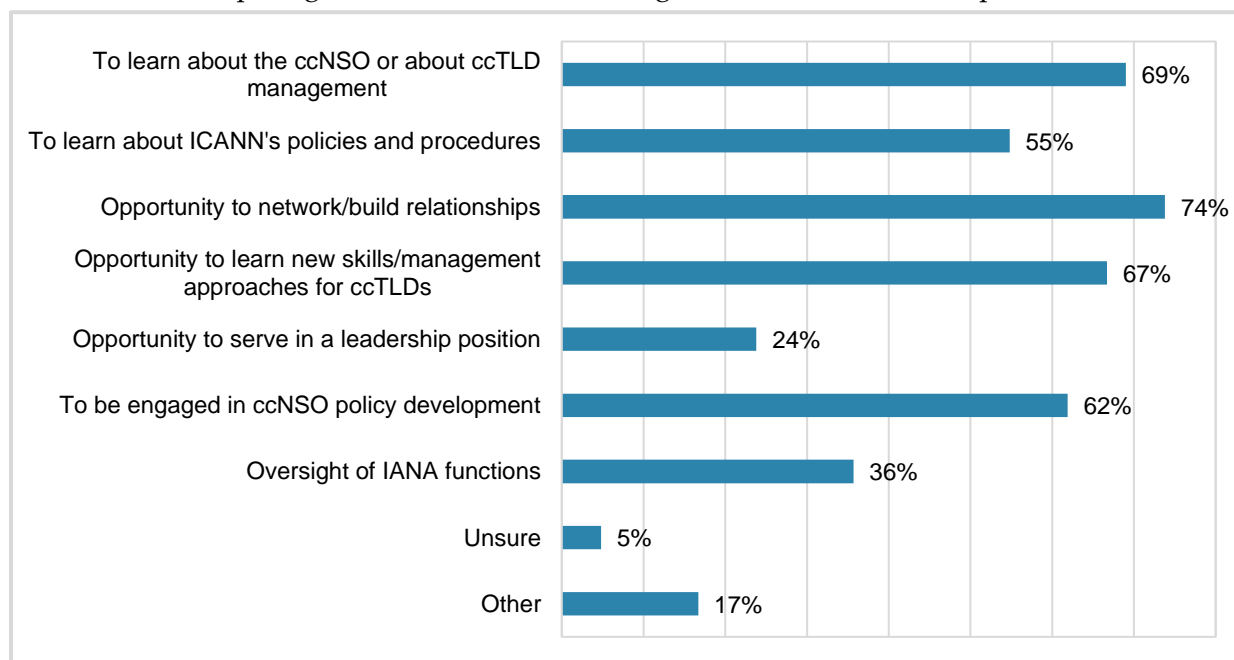
Figure 10. Survey Question: Why did you join the ccNSO? N=42 (Question open to ccNSO members and ccNSO Councillors only; respondents able to select more than one option)

still serve as a facilitator to help ccTLD managers learn from each other. In addition, many interviewees felt that the ccNSO is underutilizing the formal opportunities that already exist for community building and knowledge exchange, such as social media, the website, working groups and mailing lists, and ICANN meetings.

Members observed that an emerging and important purpose of the ccNSO for knowledge exchange is linked with its culture. As a mission-driven organization, the ccNSO provides an opportunity for country code operators to communicate and network

"[The ccNSO] provides a safe space where people are open to listening to each other and say what they are doing without fear of being judged." — Interview respondent

in a "non-competitive space". The ccNSO environment is welcoming and one of collegiality, collaboration, and respect. One interviewee shared, "[The ccNSO] provides a safe space where people are open to listening to each other and say what they are doing without fear of being judged." Another said, "It has a culture of trying to work together for common benefit."

Suggestions:

The topic of community of practice and knowledge exchange received many suggestions. The range of ideas is synthesized below.

> **[E]** There is a need for a single information knowledge hub among SO/ACs and other internet-related bodies so that stakeholders have access to trusted information in a centralized place.
>
> **[F]** The ccNSO could coordinate a more systematic way of capturing, retaining, and sharing institutional and experiential knowledge. This could include, for example:
> >   i.   Documenting interviews with past leaders and founding members.
> >   ii. Fostering more dialogue between ccNSO and other SO/ACs and constituency groups within ICANN—many of whom expressed interest in learning from ccNSO members' experience.
>
> **[G]** Capacity building and training for newer, lesser-developed, and/or smaller ccTLDs was also identified as a key role the ccNSO could expand upon. Specifically, this could include:
> >   i.   Creating a capacity building group for newer, lesser-developed, and/or smaller ccTLDs to regularly exchange information.
> >   ii. Using some ccNSO meeting time for participatory exchange in addition to the conference-format presentations and discussion. For example, the

capacity building sessions at the ccNSO Meeting at ICANN47 in Durban, 2013.[36]

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[36] ccNSO Meeting in Durban, South Africa—First Draft Agenda. (n.d.) Retrieved from
https://ccnso.icann.org/en/meetings/durban/agenda.htm

Structure & Operations

As described in the *Continuing Purpose* section, the ccNSO fulfills a range of formal and informal purposes. As one of the multistakeholder organizations within ICANN, it also balances duties to its members, ICANN, and other ACs and SOs. Effective structure and operations are critical to ensuring the ccNSO can successfully achieve and balance these responsibilities. Overall, the findings of this review do not indicate that major changes are needed in the ccNSO's structure and operations. However, findings do show clear opportunities for continuous improvement in this area and are detailed in the following sections. Beyond structure and operations, respondents and particularly ccNSO members expressed very positive views overall regarding the organizational culture of the ccNSO—which influences structural and operational effectiveness in a collaborative membership-based organization. As seen in *Figure 11*, 76% of survey respondents expressed satisfaction or high satisfaction with the organizational culture of the ccNSO.
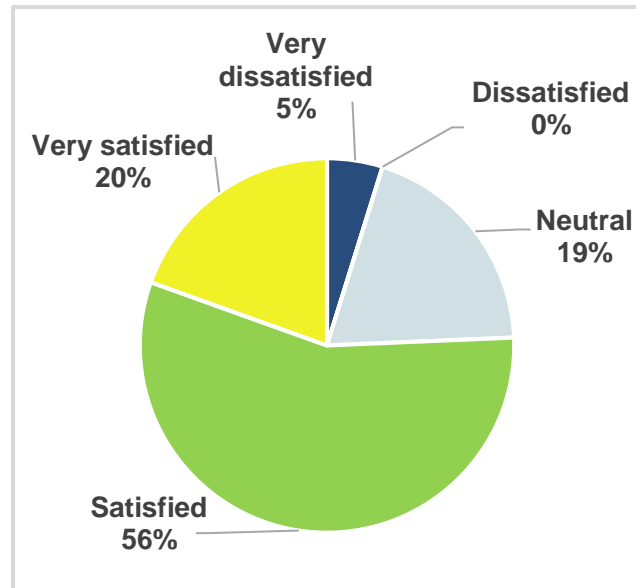
Figure 11. Survey Question: To what extent are you satisfied with the organizational culture of the ccNSO (i.e., what we do as a group and how we do it)? N=41 (questions open to ccNSO members, ccNSO Councillors, and ccNSO participants (observer/non-members) only

Activities and Procedures

The ccNSO is primarily structured and governed by a few sets of documents:

- *ICANN Bylaws* (last amended June 2018). Article 9, Annex B, and Annex C establish the formal purpose, structure, and scope of the ccNSO. The Bylaws were adopted by the ICANN Board of Directors.
- *ccNSO Rules* (adopted by the ccNSO Council in 2004). This short document establishes rules regarding meetings, voting, and other key official procedures.
- *Guidelines*. Guidelines reflect the practices and working methods of the ccNSO. They are intended to be a more flexible and evolving governance mechanism than the Bylaws or the Rules but must be adopted in accordance with the Bylaws. They are adopted by the ccNSO Council, and many are subject to the Council's periodic review.

Overall, members perceive this structure to be capable of supporting the ccNSO's operations while remaining lightweight and flexible. An exception noted by some interviewees are the Bylaws: certain provisions are difficult to adhere to today but are hard to change. For example, according to Section 18.7, the ccNSO must appoint one non-member ccTLD to a seat on the

IANA Function Review Team (IFRT). Requirements such as this one have been difficult to meet as the number of non-member ccTLDs decreases.[37] Some respondents also noted that the Rules are difficult to change, as it depends on a quorum of at least 50% of ccNSO members, of which 66% must vote in favor.[38]

Suggestion:

> **[H]** Many respondents recognized that for the ccNSO to remain responsive and effective as its membership grows, it will need to re-examine processes and rules that worked well with a smaller group but that do not scale well. The Independent Examiner understands that the Guidelines Review Committee is already working on this and supports this effort.

Policy Development

Annex B of the ICANN Bylaws establishes the ccNSO's Policy-Development Process (PDP), and Annex C delineates the scope of issues that fall under the ccNSO's policy making purview. The PDP is a complex and long process that can be initiated by at least seven ccNSO Councillors; the ICANN Board; a Regional Organization; an ICANN SO or AC; or at least 10 members of the ccNSO. A proposed policy must progress through multiple steps (including votes by the ccNSO membership, ccNSO Council, and ICANN Board), a process praised by some interviewees who view the votes and other steps as safeguards to ensure that a policy is legitimate and has substantial support.

Other interviewees described the PDP as slow, overly complex, and inefficient, and as a result, the ccNSO has rarely pursued it: only one PDP has successfully reached implementation stage in the ccNSO's history (2005-2006, PDP on ccNSO ICANN Bylaws).[39] The ccPDP on IDN ccTLD[40] advanced through to a Council ratification vote, but ICANN Board vote was deferred by mutual agreement in favor of implementation of an IDN ccTLD Fast Track Process. A third PDP on ccTLD retirement is currently in progress.[41] Certain members expressed concern that, due to the challenges of the PDP, the ccNSO has been neither proactive in its policy making activities nor effectively responsive to policy needs and real-world events.

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[37] There are 249 registered ccTLDs; 172 are ccNSO members.
ICANN Geographic Regions. (2019, January). Retrieved from https://meetings.icann.org/en/regions.
ccNSO Members. (2018). Retrieved from https://ccnso.icann.org/en/about/members.htm.
[38] Rules of the ccNSO, version 1. (2004, December). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_25723/ccnso-rules-dec04-en.pdf.
[39] PPD on ccNSO ICANN Bylaws. (n.d.). Retrieved from https://ccnso.icann.org/en/policy/bylaws
[40] ccNSO IDN PDP Working Group 1. (n.d.). Retrieved from https://ccnso.icann.org/en/workinggroups/ipwg1.htm
[41] Policy-Development Process (PDP) Retirement Working Group. (n.d.). Retrieved from https://ccnso.icann.org/en/workinggroups/pdp-retirement.htm

Over time, the ccNSO has also employed additional mechanisms to clarify pre-existing policy and practices. In particular, an example of this has been the Framework of Interpretation (FOI), which the ccNSO used to provide guidance to IANA, ICANN, and the ICANN community on the construction/interpretation of existing, commonly accepted, policy on the delegation and transfer of ccTLDs which had been, pre-ICANN, set out by an RFC - RFC1591. (Postel, 1994). FoI, provided much needed clarity where existing policy was unclear or ambiguous in the RFC.

The final outcome of the FOI process, subsequently formally adopted by the ICANN Board, explicitly repudiated earlier attempts by ICANN Org in "ICP-1" to adopt policies (claimed by ICANN to be binding upon ccTLD managers) without using the PDP mechanism, and without consultation with the ccTLD Community. The procedures used by the ccNSO to develop the FOI closely mirrored the PDP with extensive consultations with the ccNSO community; Working Group process and recommendation; and ccNSO Council and ICANN Board votes.[42] This appears to be a factor in its success, and acceptance throughout the Community, where ICP-1 had failed.

Suggestion:

> **[I]** While PDPs are used infrequently, a couple of respondents indicated that adhering to timeframes to complete the PDP would help ensure an efficient process, similar to the expedited PDP developed to address compliance with GDPR.

Lapses in Documentation

In reviewing official ccNSO documents and procedures, interviewing ccNSO participants, observing ccNSO proceedings at ICANN63 and ICANN64, and validating findings with the RWP, it became clear that occasionally there were differences between practices and official documents and procedures. At times, respondents stated as fact activities and processes that do not reflect what is proscribed in official documentation. Echoing the CCWG-Accountability Work Stream 2 (WS2)[43] efforts, it seems that some common practices are not reflected or codified in the documentation, potentially leaving the ccNSO membership with outdated, nonexistent, or inconsistent guidance; and as a result, the legitimacy of official documents and procedures is at risk. This also presents a challenge for accountability, which is further

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[42] Charter FoI WG, Update charter for Adoption 7 June 2011. (2011, June). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_26567/charter-foiwg-07jun11-en.pdf.
Final Report FOI WG. (2015, February). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_46795/foi-final-resolutions-11feb15-en.pdf.
Framework of Interpretation Working Group (FOIWG), Final Report. (2014, October). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_46435/foi-final-07oct14-en.pdf.
[43] Recommendations to Increase SO/AC Accountability. P. 27. CCWG-Accountability-WS2 Final Report (2018, March). Retrieved from https://www.icann.org/en/system/files/files/ccwg-acct-ws2-final-27mar18-en.pdf

discussed in that section as well as throughout the report where such gaps between documentation and practice were particularly evident.

NOTE:

- See Accessibility and Transparency of Information (*Accountability*) for additional findings and suggestions related to this matter.

Working Groups and Committees

Currently, there are 12 active Working Groups and Committees,[44] which are formed by the ccNSO Council and are open to any ccTLD manager (member or non-member). Participation in Working Groups is a primary way that members may engage in the substantive work of the ccNSO and contribute to decision-making. Working Groups also reduce the burden on the Council as they fulfill research, planning, writing, and other tasks that would otherwise fall on Councillors. However, a few interviewees observed that many Working Groups struggle to remain motivated and organized internally: they largely rely on the engagement and leadership of a common set of members, who are facing burnout[45] and competing demands. At the same time, some respondents indicated that the Working Group topics need to better reflect the interests of ccNSO members in order to ensure relevance and perhaps spur engagement. Currently, insufficient members respond to calls for volunteers. As a result, respondents shared that the responsibility to guide and push Working Groups has unduly fallen on the ccNSO Council Chair.

The ccNSO also participates on numerous CCWGs, committees focused on topics of relevance to multiple bodies within the ICANN community and comprised of representatives from multiple ICANN SOs and ACs. CCWGs facilitate communication between ICANN constituencies and stakeholder groups, allow them to provide input on common issues, and promote "vertical ICANN accountability." As one interviewee described, CCWGs are "vital to a healthy, robust, accountable, transparent, evolving ICANN." Although ccNSO participation on CCWGs is important for protecting the ccNSO's interests in ICANN's multistakeholder structure, the limited pool of willing and engaged volunteers has been a challenge for appointing ccNSO representatives to CCWGs.

A few respondents critiqued the lack of transparency in appointing Working Group and Committee members, who are approved by the ccNSO Council following self-nomination. In most cases, ccNSO Working Group and Committee Charters do not specify a maximum number of members and thus, in practice, all applicants are approved. However, in select situations a Working Group or Committee Charter specifies a limited number of available member

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[44] Working Groups. (2018). Retrieved from https://ccnso.icann.org/en/workinggroups.

[45] Exhaustion of physical or emotional strength or motivation usually as a result of prolonged stress or excessive activity.

positions. In these cases, if more candidates apply than there are member positions available, individual Councillors are responsible for ranking their top five candidates.[46] Councillors send their rankings to the ccNSO Secretariat and to the Council Chair and Vice-Chair(s), the overall ranking is calculated by the Secretariat, and the aggregate ranking is shared with the Council for final approval.

Although Councillors' individual ranking processes should be based on the Selection Criteria identified in the Guideline on ccNSO Working Groups[47] and any additional criteria established by individual Working Groups and Committees, some ccNSO Councillors interviewed explained that the Selection Criteria in the Guideline document are vague, and few Working Groups and Committees set additional criteria. In practice, some rankings are based solely on a nominee's name. As such, there is no information against which to assess a volunteer's qualifications in situations where candidates must be ranked and voted on. As reported in interviews, in some cases when a single candidate received both high and low scores, no discussion ensued to reconcile the differences or determine appropriate qualifications.

Although member ranking only occurs in rare cases, every Working Group's Chair is appointed by the Council. The Guideline on ccNSO Working Groups provides no information on the appointment of Working Group Chairs, other than mentioning that they are selected by the ccNSO Council (Section 3.5). Working Group and Committee charters provide some additional – though limited – information:

- The Chairs of the Guidelines Review Committee[48] and Study Group on Use of Emoji as Second Level Domains[49] must be a ccNSO Councillor, and are appointed by the Council.
- The Chairs of the Meetings Programme Standing Committee[50] and the Internet Governance Liaison Committee[51] are appointed by the Council.

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[46] Guideline: ccNSO Working Groups. (2016, March). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_47785/guidelines-working-groups-30mar16-en.pdf.
[47] Guideline: ccNSO Working Groups. (2016, March). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_47785/guidelines-working-groups-30mar16-en.pdf.
[48] Charter: ccNSO Guidelines Review Committee (GRC). (2014, December). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_46887/charter-grc-12mar15-en.pdf
[49] Purpose and Scope of Activities Emoji Study Group. (2018, February). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/emoji-sld-purpose-scope-activities-26feb18-en.pdf
[50] CcNSO Meeting Programme Standing Committee Charter. (2018, September). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/charter-mpc-20sep18-en.pdf
[51] Terms of Reference (TOR): ccNSO Internet Governance Liaison Committee (IGLC). (2019, February). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/ccnso-draft-iglc-14feb19-en.pdf

- Members of the Strategic and Operational Planning Standing Committee[52] and the TLD-OPS Standing Committee[53] nominate a Chair, who is then appointed by the Council.

These charters do not describe these nomination or appointment processes in any further depth. Notably, there is no formal, standard procedure for an individual to put forward their name for consideration for a Chair position; this may discourage lesser-known or newer participants in the ccNSO from gaining leadership positions. It is worth nothing that while these points are referenced in the *Structure & Operations* section of the findings, the perceived lack of transparency and standardization around the selection process for Working Group members and Chairs also has implications for *Accountability*.

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[52] Strategic and Operational Planning Interaction Committee Charter. (2017, November). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/sopc-charter-01nov17-en.pdf
[53] TLD-OPS Standing Committee Charter. (2017, September). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/charter-tld-ops-standing-21sep17-en.pdf

Finding: There is an opportunity to better evaluate the merit of potential working group candidates in the event of more applicants than available spaces, thereby fostering more diverse participation and leadership.

> **Recommendation [2]:** the ccNSO Council should amend the "Information received from nominees" section of Annex B of the Guideline: ccNSO Working Groups to request that all applicants submit a short biography. The following Guideline section, "Initial selection of candidates" should be amended to indicate that biographies are anonymized by the ccNSO Secretariat before sharing with Councillors for a confidential ranking of candidates.

Finding: There is perceived lack of transparency and standardization around the selection process for Working Group members and Chairs.

> **Recommendation [3]:** the ccNSO should update Section 3.5 of the Guideline: ccNSO Working Groups to clearly articulate and standardize the process for nominating and appointing Working Group Chair(s).

Finding: The ccNSO's participation in the IANA Naming Function Review Team should not be impaired due to fluctuations in the number of ccNSO members and non-members.

> **Recommendation [4]:** the ccNSO should request a change in the Bylaws requirement for the IANA Naming Function Review Team, which requires two ccNSO members and one non-member. **NOTE:** This request was made to the ICANN Board[1] on 12 April 2019 and, as the IE, we concur. We recommend that the three seats on the IANA Naming Function Review Team be geographically diverse and membership-neutral.

Suggestions:

[J] While there is no way to control Councillors' vote on working group nominations, we encourage the ccNSO Council and members to consider placing more attention on cultivating new, next generation leaders in the nomination and appointment processes for working group members and Chairs.

The following suggestions may be helpful for the Guidelines Review Committee to consider if they are not already:

> **[K]** To create opportunities for next generation leadership amongst Working Group Chairs, the ccNSO could adopt a procedure for individuals to volunteer for Chair positions and follow a similar anonymized evaluation and ranking of short biographies as described in Recommendation 2.

> **[L]** While many Working Groups already record meeting attendance and minutes, it may be helpful to mandate this in the Working Group Guidelines and ensure the information is made accessible to others in order to better foster awareness among the ICANN community.

Regional Organizations

Regional Organizations are not a formal entity within ccNSO or ICANN structures, yet they have served a valuable purpose in the ccNSO. Regional Organizations are not-for-profit associations founded by and for ccTLD registries. Independent from the ccNSO, they are open to both member and non-member ccTLDs. In accordance with Section 10.5 of the ICANN Bylaws, the ccNSO may designate a Regional Organization for each ICANN Geographic Region. The Regional Organizations that are recognized by the ccNSO are the Africa Top Level Domain Organization (AFTLD); Asia Pacific Top Level Domain Association (APTLD); Council of European National Top-Level Domain Registries (CENTR); and Latin American and Caribbean ccTLDs Organization (LACTLD).

Regional Organizations provide a forum for exchanging information, building technical and leadership capacity, and discussing regional policy issues. Interviewees repeatedly highlighted their value in the ccNSO ecosystem, as they help create a strong sense of community and offer more geographic- or language-specific resources than the ccNSO is able to provide. Smaller ccTLDs often participate to a greater degree in Regional Organizations than in the ccNSO. Future ccNSO leaders (such as potential Council candidates) are often identified and nurtured through Regional Organizations. They also provide an opportunity for the ccNSO to keep non-member ccTLDs informed of ICANN activities and to recruit new members. Given these roles, some respondents indicated it would be helpful for the ccNSO to better engage Regional Organizations. However, as two separate entities, it is unclear where the responsibility for greater engagement lies, other than with the ccTLD managers who are members in both.

Suggestion:

> **[M]** To address respondents' indications that it would be helpful to better engage Regional Organizations, there may be a need to improve understanding among ccTLD managers about how much, and in what ways, Regional Organizations can be involved in the ccNSO.

ccNSO Council

As established in the ICANN Bylaws, the role of the ccNSO Council is to administer and coordinate the affairs of the ccNSO and manage its policy-development process. The ccNSO Council, which is led by the Council Chair and at least one Vice Chair, consists of:

- Fifteen Councillors appointed by ccNSO members.[54] Each of ICANN's five Geographic Regions (Africa, Asia/Pacific, Europe, Latin America/Caribbean, and North America) are each represented by three Councillors.[55] Regional Councillors are elected to three-year terms, and the election cycles for the three Councillors within a region are staggered one year apart.
- Three Councillors appointed by the ICANN Nominating Committee (NomCom) to serve three-year terms, which are staggered one year apart.

Over half – 59% – of survey respondents said it was "Very important" or "Somewhat important" to explore possible efficiencies in the structure and operations of the ccNSO Council (*Figure 12*). Many comments were also provided during the interview phase that support this view, which are described below. Respondents' suggestions on how to enhance efficiency will be explored in a subsequent report which includes recommendations based upon these findings.

Suggestion:

[N] Processes should be designed for ccNSO action and these could be further automated using suitable tools. These automated processes would
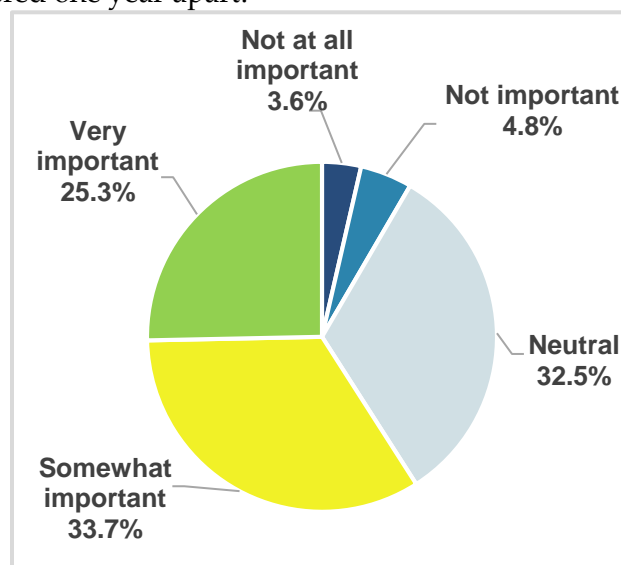
Figure 12. Survey Question: How important do you think it is to explore possible efficiencies in the structure and operations of the ccNSO Council? N=83.

help with information flow, both between members, but also to help explain the

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[54] A candidate for the ccNSO Council must be nominated and seconded by ccNSO members in the region they represent.

[55] Candidates to the ccNSO Council do not need to be residents or citizens of a country within the region they seek to represent.

Call for Nominations to the ccNSO Council. (2018, September). Retrieved from
https://ccnso.icann.org/en/announcements/announcement-11sep18-en.

Guideline: ccNSO Council Election Procedure. (2017, August). Retrieved from
https://ccnso.icann.org/sites/default/files/field-attached/guideline-ccnso-council-election-procedure-31aug17-en.pdf.

ICANN Geographic Regions. (2018, January). Retrieved from https://meetings.icann.org/en/regions.

ccNSO's mission and activities to the outside world. For instance, if there were standard templates (or "building blocks") for workplans, working group sites, and wikis to consistently organize information, a user could very quickly find what they are looking for. This is a design solution, but also a mentality shift in terms of standardizing and streamlining the different sub-components of the ccNSO.

Size and Structure of the Council

Interviewees shared mixed views on whether the size and structure of the Council impede or promote effectiveness. Some interviewees expressed that 18 seats are insufficient to represent the full diversity of the ccNSO. Others discussed how the number of Councillors is too large. Some regions struggle to fill their three seats with qualified and interested candidates. There is also a perception amongst members that not all Councillors are active and engaged (discussed further in the "Accountability" section), and the size of the group facilitates a lack of participation among some Councillors. Separately, one interviewee suggested the current size of the Council is a financial strain to the ccNSO. The ccNSO provides travel funding to three NomCom appointed Councillors and one Councillor from each region each ICANN meeting;[56] this is expensive to the organization and to the Councillors who do not receive travel funding. Although the Council meets regularly via conference calls,[57] ICANN meetings are venues for productive face-to-face meetings and for member-Councillor interaction.

Interviewees supported having a Council primarily comprised of regionally-elected seats, as country and region affiliation typically correlates[58] to an individual's identity in the ccNSO community. Geographically-variant differences in members' priorities and perspectives should be reflected in Council deliberations. However, concerns were raised regarding ccNSO rules on the regional affiliations of Councillors: currently, Councillors "need to be neither resident in the region nor a citizen of a country within the same region in which they stand for election."[59]

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[56] ccNSO Travel Funding Guideline, Version 3. (2016, April). Retrieved from https://ccnso.icann.org/sites/default/files/file/field-file-attach/2016-12/travel-funding-07apr16-en.pdf.

[57] Role of the Council. (2019). Retrieved from https://ccnso.icann.org/en/about/council/role.htm.

[58] ccTLD managers are not necessarily residents or citizens of the country whose country code they manage. IANA ccTLD Delegation and Transfer Guidelines state that a ccTLD manager must be a resident of, or incorporated in, the country associated with the ccTLD, unless formally decided otherwise by the relevant government or public authority. In addition, according to the ICANN Bylaws, managers of ccTLDs that are members of the ccNSO are referred to as ccNSO members "within" the Geographic Region where the ccTLD is incorporated, regardless of the physical location of the ccTLD manager. Delegating or transferring a country-code top-level domain(ccTLD). (n.d.). Retrieved from https://www.iana.org/help/cctld-delegation

[59] Call for Nominations to the ccNSO Council. (2018). Retrieved from https://ccnso.icann.org/en/announcements/announcement-11sep18-en.

There were varying perspectives regarding the NomCom seats. One viewpoint supported having NomCom appointees, as it is a defined and official opportunity for ICANN and non-ccTLD representation in the ccNSO. The other objected to the NomCom seats due to a perceived lack of transparency and accountability: some interviewees suggested that the NomCom appointees are not as involved in the activities of the Council as their regionally-elected colleagues and criticized the lack of ccNSO input in the selection process. The latter point is also noted in the *Accountability* section.

Any individual can offer a candidate recommendation on the NomCom website,[60] and the ccNSO holds one seat on the NomCom.[61] Prior to launching the yearly selection process, the NomCom offers focused consultations with the organizations and bodies to which NomCom appoints individuals in order to inform the NomCom about desired skillsets;[62] for example, in November 2018, the NomCom prepared for its upcoming appointment cycle by soliciting updates or changes to the ccNSO skillset/criteria from the ccNSO Council Chair, and the two groups set a meeting at ICANN64.[63] However, candidate information is kept confidential throughout the selection process; as such, the deliberations, records, and communications of the NomCom regarding specific candidates are not released publicly.[64] Further information about the NomCom's process, Operating Procedures, and Code of Conduct can be found on its website.

The ccNSO cannot reject a NomCom nominee, an issue that a few interviewees raised. In 2017, the ccNSO Council published a resolution in opposition of a NomCom nominee because of the imbalanced representation it would create on the Council. In this case, the ccNSO had to rely on the nominee's voluntary resignation and the selection of a new Councillor by the NomCom.[65]

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[60] How to Suggest and Encourage Someone to Become a Candidate. (2019). Retrieved from https://forms.icann.org/en/groups/nomcom/suggest.

[61] One of the 15 voting delegates on the NomCom is reserved for a ccNSO member. The other delegates represent the Address Supporting Organization (ASO) (1); the Generic Names Supporting Organization (GNSO) (7); the Internet Architecture Board (IAB) for Internet Engineering Task Force (IETF) (1); and the At-Large Advisory Committees (ALAC) (one per region, 5 total).
2019 ICANN Nominating Committee. (2019). Retrieved from https://www.icann.org/nomcom2019.

[62] ICANN Nominating Committee (NomCom) Operating Procedures 2019, Section 7. (2019). Retrieved from https://www.icann.org/resources/pages/nomcom2019-procedures-2018-12-07-en#A7a.

[63] Description of ccNSO position and requirements. (2018, November). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/ashcraft-to-sataki-20nov18-en.pdf.
[Ext] RE: Description of ccNSO position and requirements. (2018, December). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/sataki-to-ashcraft-12dec18-en.pdf.

[64] ICANN Nominating Committee (NomCom) Operating Procedures 2019, Section 7. (2019). Retrieved from https://www.icann.org/resources/pages/nomcom2019-procedures-2018-12-07-en#A7a.

[65] Nominating Committee's Selection to the ccNSO Council (2017, September). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/sataki-to-nomcomm-29sep17-en.pdf.

Suggestion:

> **[O]** The perceived lack of transparency of the NomCom ccNSO Council nominees was raised by several participants. While there was no clear agreement over how to address this issue, it is clear that there is room for continuous improvement. This could entail a change in the Bylaws that provides the ccNSO Council or membership with some recourse if they collectively deem a NomCom nominee to be inappropriate.

There were divergent suggestions on how to improve the efficiency and effectiveness of the size and structure of the ccNSO Council. Based upon our review, the IE does not propose any structural changes to the Council at this time.

Councillor Diversity

Many interviewees and some survey respondents worried that the ccNSO is not benefitting from new ideas, energy, and creativity due to limited diversity in its leadership. This can partially be linked to the lack of competitive elections and incumbent advantages (discussed in the "*Accountability*" section) that prevent "new blood"[66] from entering the Council. Respondents also observed that a similar set of individuals volunteer for most leadership positions in the ccNSO. Interviewees described that this is in part a result of the amount of time these positions demand: smaller or lesser-funded ccTLDs do not have the capacity to dedicate time to the ccNSO. Interviewees also described the difficulty of building visibility and leadership experience without the alliances, mentorship, and knowledge that comes from years spent in the ccNSO; again, smaller and lower-resourced ccTLDs face challenges entering into positions of leadership in the ccNSO, as do newer members. ccTLD managers who are younger

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[66] The concept of bringing new blood into an organization is a reference to new people who are likely to improve the organization with new ideas and enthusiasm.

in age also face these obstacles, an increasing challenge for an organization that must foster a new generation of leadership to sustain itself into the future.

Suggestions:

> **Finding:** The number and diversity of people involved in the ccNSO Council could be improved.
>
> > **Recommendation [5]:** the ccNSO should limit the number of consecutive terms a Councillor can serve. In regions with fewer members to draw upon and/or in the case of no willing volunteers seeking election, this requirement could be waived for that term. **NOTE:** a more restrictive version of this recommendation was made in the 2010 ccNSO Review that did not take into consideration diverse regional contexts which may prevent a region from cultivating new candidates. The recommendation was not adopted due to lack of feasibility across all regions.[1]

[P] The Guidelines Review Committee is working on implementation of WS2 recommendations on diversity and accountability. As this work gets underway, it may be valuable to consider ideas to foster Councillor diversity. This could include, for instance:

  i.   creating subgroups to share experiences and promote mentorship of next generation leaders (e.g., women of the ccNSO);
  ii. mandating 2/18 Council seats be filled by newcomers (< 2 years membership)

NOTE:

- Also see Recommendations 2 and 3 and Suggestions K and L under Working Groups and Committees (*Structure & Operations*) for additional considerations related to these findings.

Support from the ccNSO Secretariat

While this review's recommendations do not cover the ccNSO Secretariat, many respondents referenced the important role it plays in the structure and operations of the ccNSO. The ccNSO Secretariat is currently comprised of four staff members appointed by ICANN. The staff provide administrative and communications support to the ccNSO, as well as advice and support to Working Groups and the ccNSO Council on process and substantive matters. In an organization that is challenged by volunteer fatigue and information overload, the Secretariat provides important assistance, order, and continuity.

Interviewees particularly value the individual who has taken on a leadership role for the ccNSO Secretariat team – the Vice President for Policy Support-ccNSO Relations – who is seen by members as a stable, highly experienced, and trusted member of the organization. One interviewee described him as "more than a staff support for the ccNSO; in many respects he is a

general manager that executes, chases, and moves things along." Despite frequent praise, interviewees raised concerns about the extent to which the ccNSO relies on an individual for institutional knowledge and leadership. As someone seen as a backbone of the ccNSO nearly since its inception, members expressed concern that this vast institutional knowledge is not recorded elsewhere and creating this redundancy may present a significant challenge. Over one-third of survey respondents agreed that there is a need to strengthen the security, stability, and resilience of the Secretariat's long-term redundancy for institutional knowledge (*Figure 13*).
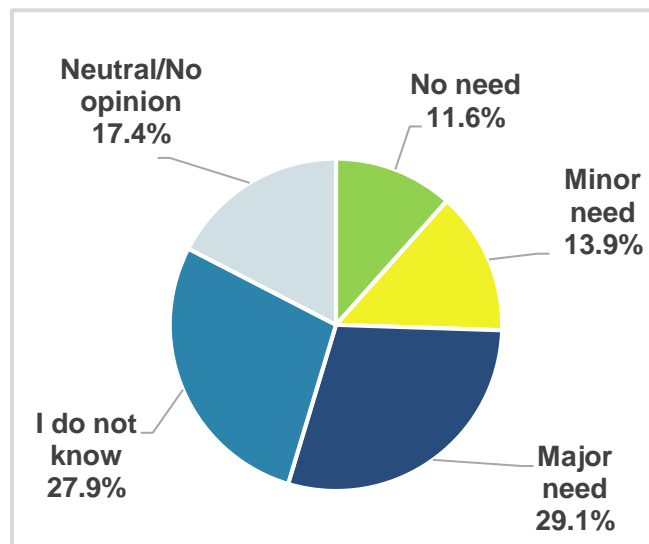

Figure 13. Survey Question: To what extent, if any, do you see a need for enhancing the security, stability, and resilience of the ccNSO Secretariat's institutional knowledge? N= 86.

NOTE:

- See Suggestions F and G under Community of Practice & Knowledge Sharing (*Continuing Purpose*) for considerations related to these findings.

ICANN Meetings

Interviewees and survey respondents identified ICANN meetings as valuable opportunities to exchange information and build community within the ccNSO. Tech Day was a frequently-highlighted event. Members view Tech Day as one of the strongest ways the ccNSO serves a broader purpose within ICANN as a community for knowledge exchange. Respondents expressed desire to expand Tech Day-like opportunities; they noted that there is potential for increased knowledge exchange, rather than one-way sharing, during and outside ICANN meetings, and for sessions on a wider variety of topics (e.g., legal, policy, and technical issues).

While individuals appreciated that Constituency Day at ICANN meetings offers dedicated opportunities for ACs/SOs – and thus the ccNSO – to meet amongst themselves, some cautioned that the ccNSO can become too siloed at ICANN meetings, to the detriment of communication, knowledge exchange, and relationship-building across SOs and ACs. In particular, these comments arose in the context of the ccNSO-GNSO interface. Many interviewees discussed the wealth of knowledge and best practices that could be shared between ccTLD and gTLD communities – even given their many differences – but these exchanges are limited even when they occur. Many members also wished that, within its own

membership, the ccNSO offered more opportunities for Regional Organizations to provide updates, exchange best practices, and generally foster relationships to bring together the worldwide community surrounding the ccNSO.

Members appreciated the variety of activities and learning groups that they can attend throughout the week of ICANN meetings, including those mentioned above. However, a few critiqued the lack of innovation in how the ccNSO designs its portion of ICANN meetings, which one member described as "cut and dry." The ccNSO often follows a similar schedule of events and organizes similar types of activities, and as a result some respondents observed that enthusiastic engagement and productive interactions are waning over time.

Barriers to Participation

As a collaborative multistakeholder organization, the ccNSO relies on the engagement and contributions of its members to run activities and represent the interests of ccTLDs within ICANN. In response to the survey question, "To what extent are you satisfied with the opportunities for individuals to gain visibility and/or to actively engage within the ccNSO?" 51% of respondents answered, "Very satisfied" or "Satisfied" (*Figure 14*). Yet, this doesn't always translate to active participation in the ccNSO: 44.7% of survey respondents agreed with the statement: "Yes, I have opportunities to engage [in areas of work that interest me and/or that I think are important], **but I am not very engaged**" (*Figure 15*). As alluded to in the prior sections, there are perceived barriers to participation in the ccNSO and opportunities to make improvements to facilitate more active participation.

"The ways of the ccNSO appear quite mysterious, even to insiders (much like a lot of ICANN!). Everything is very complicated and full of jargon. Unless you were around since the beginning of ICANN it's hard to fathom why things are as they are. This is a huge barrier to participation for newcomers." — Survey respondent

In response to a survey question on barriers to participation, a respondent stated, "I have a lot of things to learn before I could be part of ccNSO volunteering." Another noted, "Some groups and topics look very overwhelming from the outside and have been going on for years." A few interviewees

- Yes, I have opportunities to engage, and I am engaged.

- Yes, I have opportunities to engage, but I am not very engaged.

- No, I do not have opportunities to engage. I would actively engage if I had more opportunities.
- No, I do not have opportunities to engage. There is nothing I want to actively engage in.

Figure 15. Survey Question: Within the ccNSO, do you feel that you have opportunities to actively engage in areas of work that interest you and/or that you think are important? N=38 (Question open to ccNSO members, ccNSO Councillors, and ccNSO participants (observer/non-members))
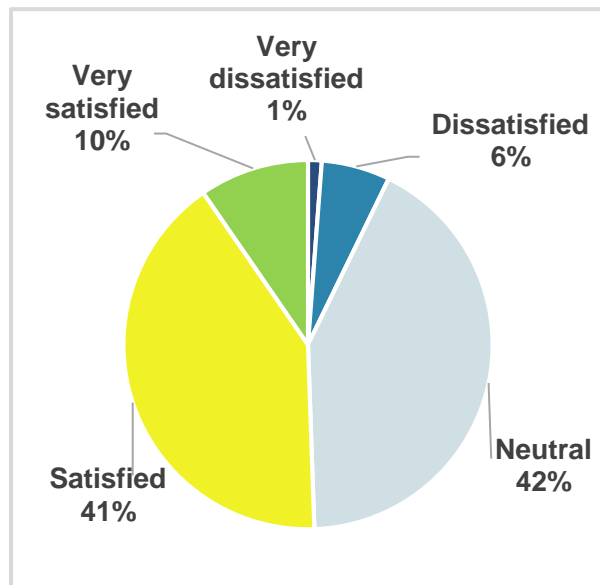
Figure 14. Survey Question: To what extent are you satisfied with the opportunities for individuals to gain visibility and/or to actively engage within the ccNSO? N=83

who identified themselves as technical experts and do not consider themselves newcomers, described their discomfort and/or disinterest working on the policy-side of the ccNSO: as one shared, "engaging in policy discussions requires new capacities you have to learn." As exemplified in these comments, some may have the desire to participate more actively but feel they do not have sufficient understanding of the issues to do so which presents additional barriers to participation.

Financial and Time Constraints

Many respondents attributed their limited participation in the ccNSO to a lack of financial resources, specifically pertaining to attending in-person meetings. Multiple interviewees shared that many smaller ccTLD operators lack the resources that larger ccTLDs have to travel to in-person meetings (three per year). Some individuals indicated that with more travel support, it would be possible for them to attend ICANN meetings and participate more in the ccNSO.

ICANN currently funds up to 17 individuals[67] from the ccNSO per meeting, of which eight are Councillors.[68] Remaining funds are prioritized for those who "actively contribute [to the ccNSO] but would not be able to do so without travel funding." Members who are new to the organization and have not yet had the opportunity to contribute can apply for the ICANN Fellowship Programme and receive travel support as a Fellow.[69]

When it comes to the costs of participating in meetings, one identified alternative is to conduct meetings virtually. One interviewee asserted that other ICANN ACs and SOs make better use of this option. However, some shared their opinions that when people are away from their daily routines and physically at a meeting, it is easier for them to focus on ccNSO matters; and that remote meetings are simply not as valuable as those that are in-person.

Time is another key resource that members must dedicate to the ccNSO. The organization is reliant upon people volunteering their time and expertise to fulfill its functions, but members struggle to find sufficient time to participate in the ccNSO. Multiple members shared the view that an unfair burden is placed on smaller ccTLD operators because they do not have large teams to distribute staff coverage at ccNSO / ICANN assignments, calls, and meetings. For many members, taking time away from one's regular obligations and responsibilities in order to participate in the ccNSO is not easy and may not even be appropriate. As one interviewee put it, ccTLD managers "should be serving the local [Internet] community; attending ICANN meetings should come as a lesser priority." Another interviewee shared that, in the early days of the ccNSO, ccTLD operators considered it in their interest to participate, but over the years that attention has dwindled and along with it, their participation. ccNSO participants may also face turnover among their superiors: a new supervisor(s) may not support continued engagement in the ccNSO from a time or financial perspective. This supports respondents' comments (described in the *Continuing Purpose* section) that the ccNSO must more clearly and strongly articulate its added value to ccTLDs – both members and non-members – to show ccTLDs that participation in the ccNSO is a valuable and important use of their time and resources.

As a result of these limits in diversified participation, a small number of individuals are conducting most of the work to keep the ccNSO operating, many of whom face periodic or chronic burnout as a result. Yet, without the engaged and consistent participation of members, the operations of the ccNSO become less efficient.

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[67] This number was provided by the RWP although official documentation indicates 12. See: ccNSO Travel Funding Guideline: https://ccnso.icann.org/sites/default/files/file/field-file-attach/2016-12/travel-funding-07apr16-en.pdf

[68] ccNSO Travel Funding Guideline. (2016, April). Retrieved from https://ccnso.icann.org/sites/default/files/file/field-file-attach/2016-12/travel-funding-07apr16-en.pdf

[69] ccNSO Travel Funding Guideline, Version 3. (2016, April). Retrieved from https://ccnso.icann.org/sites/default/files/file/field-file-attach/2016-12/travel-funding-07apr16-en.pdf.

Interpersonal Communication Challenges

A few interviewees attributed interpersonal communication challenges as obstacles to a more participatory, inclusive, and efficient ccNSO. Some described how they occasionally withdraw from ccNSO conversations because of unmediated differences in communication styles. A communication style is descriptive of how people communicate verbally and nonverbally; for instance, some interviewees described being quieter and have difficulties being heard in conversations dominated by individuals with louder, more direct, and/or more aggressive communication styles. Notably, communication styles and norms vary across cultures. While one interviewee commended the Chair of the ccNSO Council for working to manage and overcome these differences in such a cross-cultural organization, many interviewees expressed frustration that a small but loud minority is still frequently able to dominate the discourse.

Practical Considerations

Time Zones

In order to accommodate participation by individuals in a wide range of time zones, ccNSO calls are scheduled at different times on a rotating basis. As a result, there are occasions when ccNSO participants are asked to participate outside of regular business hours including at times in the middle of the night, which understandably hinders peoples' ability to participate.

Language

While many respondents characterized the ccNSO community as an inclusive environment, many respondents expressed a belief that the ccNSO caters to the anglophone community and, by not providing written and verbal information in multiple languages, prevents active participation by a broader set of stakeholders. Even with English-speaking skills, discussing highly technical issues in a fast-paced environment such as the ccNSO can be a major challenge without English fluency in such topics. Respondents indicated that providing language services such as simultaneous translation at ccNSO members day meetings and/or webinars has been a previous topic of discussion at ccNSO meetings. Although, according to some, the cost estimates associated with language services were seen as prohibitive and therefore were not pursued. ICANN's Language Services Policy and Procedures stipulates that interpretation will be provided at ICANN public meeting plenary sessions.[70]

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[70] ICANN Language Services Policy and Procedures (2012). Retrieved from
https://www.icann.org/en/system/files/files/policies-procedures-18may12-en.pdf

Finding: It is important to engage a diversity of voices through varied, interactive meeting formats to enable participation from people who are not as comfortable standing up with a microphone in front of the membership.

> **Recommendation [6]:** the ccNSO Meetings Programme Committee should develop and adopt meeting formats to allow more varied interaction between participants at ICANN meetings (e.g., small regional group discussions followed by small group topical discussions). **Suggestion R** includes several ideas for implementing this recommendation.

Finding: The lack of real-time scribing of ccNSO Members Day meetings presents a barrier to participation for remote participants and non-native English speakers.

> **Recommendation [7]:** ICANN should provide real-time scribing of ccNSO Members Day meetings. As the Independent Examiner, we recognize that addressing this finding is outside of the ccNSO alone to remedy.

Suggestions:

[Q] Several respondents suggested the Meeting Programme Standing Committee could make ccNSO Members Day meetings more dynamic in terms of the topics covered and the processes used, with a greater emphasis on fostering interaction. For example, the Members Programming Committee might consider the following respondent ideas:

    i.   Utilize the mailing list to poll/collect expressions of interest on topics affecting ccTLDs and orient part of the Members' Day meetings to address those high-interest and timely topics.

    ii.   Offer 15-minutes of rapid-fire Q&A sessions to allow people to raise topics of interest or questions they may have that could spark a conversation following the meeting.

    iii.   Use polling software to collect ideas, feedback, generate discussion (beyond the color cards for gauging temperature of the room), which may help to engage people more actively.

    iv.   For the third meeting of the year, reserve the second ccNSO Members' Day meeting for different programming such as:

        a)   Cross-community sessions. For instance, ccNSO-hosted workshops for GNSO colleagues to learn about policies and legal initiatives used by ccTLDs that could inform best practices for gTLDs; and/or,

        b)   Using a similar format to Tech Day but for Policy, Legal, or Communications discussions, which are also important topics for ccTLDs to exchange knowledge, perhaps informed by a poll in advance of planning for Tech Day to collect community input on timely topics for discussion.

[R] Several respondents suggested more could be done to build interest and capacity among the next generation of ccNSO leaders, especially from low- and middle- income countries. This could include:

    i.   providing ccNSO communications materials to Regional Organizations to encourage them to connect with those who cannot attend ICANN meetings.

    ii.   ccTLD managers training and rotating representatives to the ccNSO and participation in ccNSO Members' Day meetings and working groups (to the extent appropriate for that ccTLD context).

Several respondents indicated that participation would increase if simultaneous interpretation and translation services were offered. Translation was also recommended in the 2010 ccNSO review. However, most solutions require financial resources for things like simultaneous interpretation during meetings, which is a proposal that is explicitly outside of the scope of this review. While there are not many cost-neutral opportunities to address this challenge, technological advances may hold potential for this issue, but it requires further investigation. See Recommendation 7 on providing real-time transcription services of Members' Day meetings, which can help remote participants and non-native English speakers follow discussions more readily.

Orientation and Onboarding

As with the majority of volunteer-based organizations, the ccNSO faces a perpetual challenge in engaging newcomers and retaining them over the long-term as active participants. As many interviewees noted, a significant barrier to participation is the amount of information that new members must absorb, such as technical knowledge, cultural norms, rules and procedures, and history of the ccNSO. Both the ccNSO and ICANN at-large aim to facilitate onboarding and orientation through a variety of resources, including:

1. A "Quick Guide to the ccNSO" available on the Newcomers/Onboarding page of the ccNSO wiki.[1]
2. A ccNSO orientation course offered through the ICANN | Learn portal.

3. An interactive Newcomer Day held at ICANN meetings to introduce newcomers to ICANN.
4. Concise videos, fact sheets, and explanations about posted on the Newcomers page of the ICANN website.[71]
5. "How it works" sessions on technical topics offered at ICANN meetings. Open to both new and returning ICANN participants, they can provide opportunities for newcomers to learn about key technical matters.

Notably, none of these resources are highlighted or clearly linked to on the ccNSO's website.

"When I started attending ICANN meetings I felt I was just dumped into it, nothing was explained at all, there was no induction process and I just had to make my own way and work it out as best I could. It is really important that new individuals are helped when they start attending if they are to be able to assist the community." — Interview respondent

Many interviewees described current formal onboarding/orientation opportunities as insufficient, particularly for smaller ccTLDs and ccTLD representatives that are replacing less engaged predecessors. Survey respondents shared a more positive assessment: 42% were "Satisfied" or "Very satisfied" with the ccNSO's onboarding/orientation opportunities, 47% were neutral, and only 10% were "Dissatisfied" (*Figure 16*). Respondents noted that the ccNSO began more actively offering onboarding opportunities three to five years ago. Although conclusive trends cannot be analyzed from the limited survey sample size, 9 out of 10 respondents who have been involved in the ccNSO for 3 to 5 years (and thus became involved during that time period) were "Satisfied" or "Very satisfied" with the onboarding opportunities offered by the ccNSO. This is a higher proportion than observed amongst members that have been involved for a shorter or longer time. One person noted that ICANN at-large has been more intentional and successful at helping newcomers bridge barriers to entry than the ccNSO. For example, ICANN offers a Fellowship Programme to engage individuals from underserved and
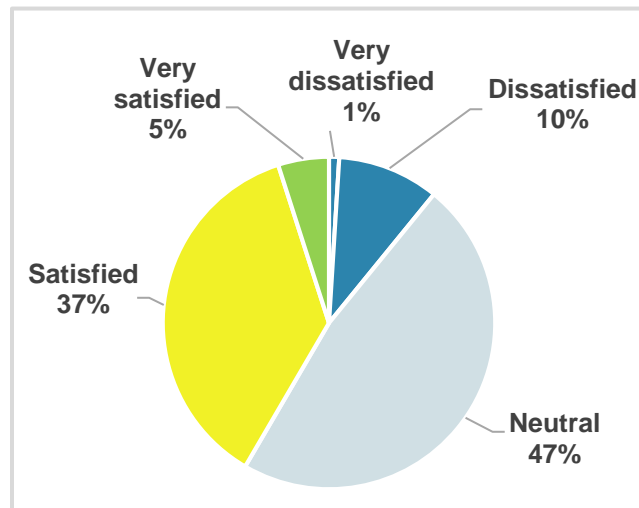
Figure 16. Survey Question: To what extent are you satisfied with the ccNSO's onboarding/orientation opportunities for individuals? N=82

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[71] I Am New to ICANN – Now What? (2019). Retrieved from https://www.icann.org/newcomers.

underrepresented communities in ICANN through meeting travel support, mentorship, skill-building, and networking sessions.[72]

In response to low newcomer retention rates and feedback describing the inadequacy of current onboarding resources, in December 2018 – after the conclusion of the interview phase of this review – the ccNSO established the ccNSO Community Onboarding Programme (COP), a year-long onboarding and mentorship program. The ccNSO program evolved from an ICANN-wide COP piloted between 2016 and 2018[73] which was not seen to effectively connect mentor and mentee relationships. The ccNSO's current program is more structured to hold interested parties to account. However, in reviewing the program's Terms of Reference, the IE observed that the application processes for both mentors and mentees and pairings seems over-engineered and time-consuming, especially for mentors volunteering their limited time. Since its inception, the program has paired one mentor and mentee.

Interviewees identified two other gaps in the ccNSO's orientation and onboarding programming. First, there is a lack of support for "not-so-new-newcomers," or members who may be seeking further information or involvement months or years after joining (a few interviewees shared that even after one or two years of participating in the ccNSO, they still felt like newcomers given the steep learning curve). Second, a number of respondents perceived that the current amount of training and orientation that Councillors receive feels inadequate to fulfill the necessary roles and responsibilities.

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[72] ICANN Fellowship Program. (2019). Retrieved from https://www.icann.org/fellowshipprogram.

[73] Terms of Reference: ccNSO Community Onboarding Programme (ccNSO COP), Version 1. (2018, December). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/ccnso-cop-06dec18-en.pdf

Finding: Many respondents indicated that more could be done to enhance the orientation and onboarding of new and newer (< 2 years) ccNSO members as well as newly-elected leaders.

> **Recommendation [8]:** The written ccNSO course on the ICANN Learn portal should be translated into all ICANN languages.
>
> **Recommendation [9]:** We recommend streamlining the mentorship program to more efficiently connect mentors and mentees. Recognizing the need for mentors may be greater than the availability of them, there may be efficiencies gained through group mentoring and/or dedicating face-to-face time at ICANN meetings for mentors and mentees to connect.
>
> **Recommendation [10]:** Resources for newcomers (including multi-lingual ICANN Learn ccNSO portal materials) should be assembled into one location that is prominently featured and easily accessible on the ccNSO website.

Suggestions:

[S] Offer a simple, jargon-free orientation webinar training(s) about what is required, what to expect, and how to engage in the ccNSO (the ICANN | Learn portal offers a course about the ccNSO, but all information is presented in writing rather than in a webinar format).

[T] Develop an easy-to-read overview packet of materials for new members that could include the work and the role of the ccNSO in relation to the entire ICANN policy and practice ecosystem (e.g., a Beginner's Guide to the ccNSO, similar to the ones provided on icann.org[74] which are also translated into multiple languages).

[U] Expand a mentorship program between larger/more experienced ccTLDs and smaller/newer members or individuals.

[V] Create a similar process to the ICANN 101 sessions for ccNSO members and participants.

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[74] Beginner's Guides. See: https://www.icann.org/resources/pages/beginners-guides-2012-03-06-en

[W] Creating a ccNSO "Hall of Fame" would provide an opportunity to teach newcomers about the history of the DNS and the pioneers of innovation while also encouraging ccNSO members and leaders to engage by offering a way to recognize their contributions over time.

Accountability

The accountability of the ccNSO is a key issue interwoven with topics of *Continuing Purpose* and *Structure & Operations*. Many respondents recognized and commended the ccNSO's improvements on openness, transparency, and accountability in recent years, with some praising what they perceive to be a more welcoming culture of non-member participation within the ccNSO. Most ccNSO members know each other quite well and have trusted relationships, which helps create a culture of peer-to-peer accountability. With regard to formal accountability mechanisms, some respondents expressed uncertainty on what the ccNSO has in place, which—even when existing mechanisms are documented and followed—can lead to perceptions that the ccNSO lacks accountability. This finding is discussed further in the following section. Accountability and transparency measures are an integral part to the ongoing functioning of the ccNSO, and two-thirds of survey respondents noted that there is a minor or major need to enhance the ccNSO's transparency and accountability (*Figure 17*). These perceptions did not vary significantly between ccNSO members and other survey respondents within the ICANN community, though slightly more ccNSO members believe there is no need to improve transparency and accountability and a slightly higher proportion of respondents who are non-ccNSO members indicated there is a major need to improve transparency and accountability.[75]
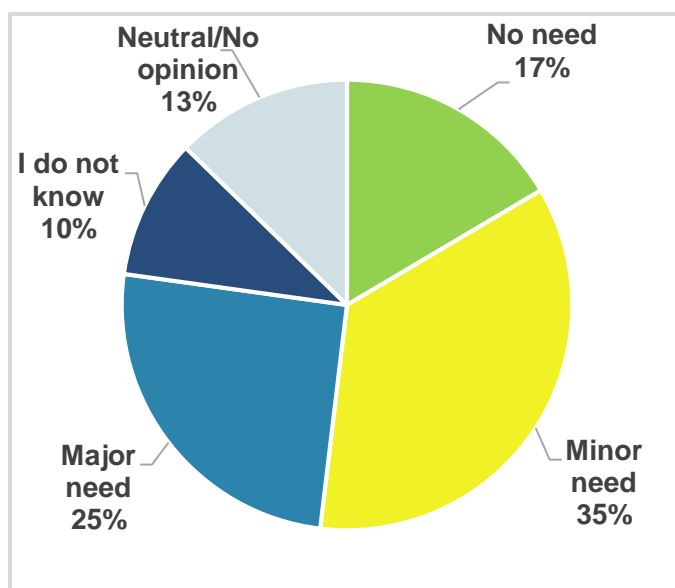
Figure 17. Survey Question: To what extent, if any, do you see a need for enhancing the ccNSO's transparency and accountability? N=79

Some respondents indicated that the way the ccNSO functions and communicates is difficult for both newcomers and long-time members to understand (discussed in *Structure & Operations*), which presents additional challenges in terms of perceptions of transparency and accountability. Respondent observations on the strengths and weaknesses of the ccNSO's accountability practices and mechanisms are discussed in this section.

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[75] During the IE's presentation on the findings at ICANN64, a few audience members asked to see other survey respondents filtered by type of respondent (ccNSO members versus others). Such a breakdown is most informative for this question. Other questions that would be relevant to analyze in this way primarily concern organizational culture and engagement, however, these questions were only posed to ccNSO members. A full list of survey questions is available in Appendix 4.

Accessibility and Transparency of Information

Overall, a majority of respondents described a high degree of information transparency: materials including ccNSO meeting recordings, minutes, Working Group meeting notes, Council decisions, processes, and official letters are all posted online and publicly accessible. ccNSO meetings are open to anyone, regardless of membership status, which helps foster a sense of transparency. An "Activity Summary" page[76] on the ccNSO website is updated monthly with all activities that have occurred in the past month and links to further information about each.

The ccNSO Council, in collaboration with the ccNSO Secretariat and in consultation with members, also develops and publishes work plans on a monthly and yearly basis. These documents outline upcoming priorities and plans on a range of activities, including administrative, policy-related, community-oriented, and more. The monthly work plans also describe progress towards key milestones and identify which Council members have taken lead responsibility for given activities. Yearly work plans are drafted by the Secretariat, with input from Working Groups and Committees, and are approved by the Council. Monthly work plans are drafted by the Secretariat and reviewed by the Council but do not require approval.

Although the work plans are highly detailed, they are difficult to read, primarily due to formatting and limited narrative explanation. Monthly work plans are not updated monthly on the ccNSO website. Interviewees did not mention the existence of the work plans, yet many described a lack of awareness about the activities of the Council in addition to a perceived lack of transparency on the Council's work. The workplans have the potential to be a tool for information-sharing, member participation, and transparency, but as currently operationalized and disseminated, fall short in meeting these objectives.

In relation to this point, some respondents observed that while information is available online, users may have challenges in readily finding specific information on the ccNSO website or understanding the materials that are posted. Although the ccNSO website hosts a digital library of documents that includes a search function, the amount of information can be overwhelming and specific content may be difficult to find. Some respondents noted that items on the website are frequently moved to new locations, adding to confusion about where to find information. They also noted that the website is not particularly navigable or user-friendly due to its outdated design.[77] The ccNSO website is managed by ICANN and therefore the findings associated with the website are not something the ccNSO alone could address. However, it is important to note that if information is not conveyed clearly, it can be a barrier to participation

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[76] ccNSO Activity Summary. (2018). Retrieved from https://ccnso.icann.org/en/resources/activity-summary-2019-en.htm.

[77] Through the activities of the Information Transparency Initiative (ITI), the ecosystem of ICANN websites – which includes the ccNSO website – is undergoing an updating and redesign process. The ccNSO itself is not able to independently redesign the website as it is hosted by ICANN.

and also undermine accountability among ccNSO participants, staff, and leadership if they cannot understand key information and decisions.

Notably, as discussed in the *Structure & Operations* section, members are not aware of some information (including official documents and procedures) published by the ccNSO, and/or that information is not regularly updated to reflect common practice and evolving activities and norms. Based upon our fact-checking and document review, we conclude that in most cases there is ample information available on the website, but this finding was often in contrast to ccNSO members' perceptions of the availability and/or ease of finding available information.

> **Finding:** Many of the findings related to accessibility and transparency of information are rooted in challenges with the current ccNSO website. As the Independent Examiner, we also experienced difficulty in trying to locate documents on the website for fact-checking. Lack of easy access to information also presents a barrier to participation.
>
>> **Recommendation [11]**: We recommend the ccNSO website should be redone as soon as possible. It is one of the more (if not the most) outdated SO/AC websites yet it is a key tool that supports accountability, transparent communication, and efficient operations.

Suggestions:

[X] Overall, respondents suggested more needs to be done on the *communications* side of transparency of information to help orient newer or less engaged members and participants to what information is available and what is happening on a more regular basis. Ideas for doing this included:
  i.   Finding ways to better consolidate and package information to provide regular but concise updates; making clear distinctions between background information vs. resolutions for consideration; and hyperlinking to any references used.
  ii. Using communication channels (mailing list, newsletter) to announce when and where documents are published to the website since many respondents found it difficult to locate documents or were unaware they exist.
  iii. Using the wiki to communicate latest information from the ccNSO's work including notes taken on ccNSO calls for those that wish to review but may have missed the email.

    iv.   Creating a glossary of terms (similar to the retirement PDP) could help clarify and communicate terminology that may be unfamiliar to newer members and participants.

[Y] For external communications, some respondents suggested the ccNSO could:
    i.   Better communicate its roles and the limitations to governments, policymakers, and other stakeholders; this would improve transparency of information while also raising awareness of the ccNSO.
    ii.   Improve the ccNSO's leverage of social media tools to engage the ccTLD community.
    iii.   Provide a tool for tracking the ccNSO's responsiveness and efficiency in relation to the EC responsibilities acquired in the IANA transition.

[Z] Considering the ccNSO website is scheduled for a re-design along with other SO/ACs, when the time comes, the ccNSO may want to consider convening a Working Group to develop priorities for the new website. Some suggestions included for the new website included: designing for offline/low-bandwidth access and considering accessibility from different devices and browsers. Since web design decisions usually entail trade-offs and budget implications, it may be helpful for the ccNSO to initiate discussion on its top priorities for the new site once the redesign schedule is made clear.

[AA] Similar to the communications recommendations under 'Accessibility and Transparency of Information', some respondents asked for improved communication between the ccNSO Councillors and members and non-members through the use of widespread, accessible technology tools and social media platforms that would better connect members with constituencies outside of the meetings. [**Note:** the IE does not have access to ccNSO mailing lists or archives and cannot independently assess the degree of transparency around communications between Councillors and ccNSO members.]

[AB] Some respondents suggested the Council should enable greater member participation, for instance, by making all working documents available to the membership. Most working documents, due to the frequency of changes, are not currently publicly posted, but documents for discussion and approval as well as meeting recordings are available in the ccNSO Council Workspace.[78]

[AC] For parties that want to communicate with ccTLDs regarding policy development and technical coordination, the ccNSO could help clarify external communications regarding the pathways for receiving non-member input, which may be unclear to those outside of the process.

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[78] See https://community.icann.org/display/ccNSOCWS/Council++Workspace.

Decision-Making in the ccNSO

As some respondents observed, there are regular updates and communications, opportunities to provide input, elections, and community-based debate where different views can be shared freely—all of which facilitates member engagement in the management and operations of the ccNSO, increasing the organization's accountability to its members. Working Groups are also an environment wherein ccNSO members may express their opinions amongst each other and determine what the clear and concise set of recommendations are that the community wants to provide in a common voice, before they reach the Council. Prior to making a decision (on more significant, non-administrative matters), the Council commonly solicits member input, such as by gauging the "mood of the room"[79] – a semi-formal tool for assessing member agreement at ccNSO meetings.

Most respondents indicated that these and other participatory processes of the ccNSO provide a strong decision-making approach because it allows everyone to have a sense of ownership. Although, one respondent indicated that it proves difficult for the ccNSO to develop a consensus view due to the diversity of its membership. The need for membership-wide votes as part of PDPs, for instance, has been a challenge for organizational effectiveness and efficient procedures even as it has been an important tool to engage members in decision-making and increase the organization's accountability to its members.

Accountability of the ccNSO Council

Overall, the clear majority of those interviewed and surveyed thought the Council was accountable as an institution. This collective view is reflected in the words of one respondent: "Through our representatives, we are in touch with what is happening in the organization. If we feel that the Council isn't making good decisions, we can make that explicit and influence the organization to do it right. [I] haven't ever felt there's a disconnect between the ccNSO leadership and what the ccTLDs want. It is accountable."

In contrast and worth noting, one respondent thought the Council should take a much less active role and that the ccNSO should be purely member driven—perhaps a different interpretation from what others currently see as member-driven through entities like Working Groups with significant leadership from the elected Council.

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[79] If the Chair of a session or a presenter consider it relevant and appropriate, the ccTLDs present at a meeting (in person and remotely) may be called to express on a specific topic their sentiment or the "mood of the room." An expression of sentiment or "mood" may neither be interpreted as, nor does it replace a formal vote or other formal expression of preference. The Secretariat will hand out "temperature measuring cards" (red, yellow, and green sheets) to one representative per ccTLD and ensure the sense of remote participants are taken into account as well.
Guideline: ccNSO Meetings (2016, March). Retrieved from
https://ccnso.icann.org/sites/default/files/filefield_47781/guidelines-council-meetings-30mar16-en.pdf

A few respondents thought the ccNSO Council could be more transparent to other SOs/ACs and the ICANN Board. The ICANN Bylaws state that non-voting Council liaisons to the ccNSO Council may be appointed by the GAC, the ALAC, and Regional Organizations. Non-voting observers to the Council may be appointed by any SO.

"Through our representatives, we are in touch with what is happening in the organization. If we feel that the Council isn't making good decisions, we can make that explicit and influence the organization to do it right. [I] haven't ever felt there's a disconnect between the ccNSO leadership and what the ccTLDs want. It is accountable." — Interview respondent

Quality and Consistency of Engagement

Organizational accountability is, in large part, based upon individual accountability, and many members feel this is where the ccNSO falls short. Their perception of ccNSO's accountability is heavily influenced by their observations of Councillor participation and individual accountability to their constituents. Many members perceive that only a subset of the 18 Councillors are actively fulfilling their roles and responsibilities.

Many of those interviewed recognized the voluntary nature of the Councillor roles and observed that Councillors are trying to do their best given limited time they may have to engage. Still, they expressed frustration and concern that there is a lack of consistent Councillor leadership. Many respondents observed that Councillors frequently miss Council meetings, [80] which can impede effectiveness (for example, in rare cases absenteeism can delay votes that require a higher quorum) but more importantly is an issue of accountability and Council legitimacy. As one interviewee said, "We have deadlines to meet. We expect 18 preferences, not 12" (another interviewee alleged the number of highly engaged Councillors is closer to three to six). Not all participate actively in Working Groups or other activities although it is worth noting this is also not a stated Councillor requirement or responsibility. To some, this was identified as a structural and operational problem: there are no criteria or qualifications for becoming a ccNSO Councillor, and the Council may be too large. Others emphasized this is a cultural problem: the ccNSO Council struggles from burnout and lack of motivation amongst its leaders. The result is a Council that is not as effective and efficient in its operations and as accountable to its constituents due to limited engagement.

Suggestions:

> **[AD]** Recognizing inconsistent Councillor engagement is a challenge, it may be valuable to first understand the reasons behind lack of engagement before designing solutions for it. Conducting a survey among past and present Councillors could help identify any barriers to participation. This understanding could then inform the Council election

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[80] Attendance. (n.d.) Retrieved from https://ccnso.icann.org/en/about/council/attendance.htm.

process (making expectations and time commitment clear to nominees[81]) and inform potential solutions to enhance Councillor engagement.

[AE] Several respondents suggested some form of performance metrics for Councillors, for instance:

    i.   A maximum number of Councillor absences from meetings, after which they lose voting rights or alternatively, must resign.

    ii.   Developing an assessment mechanism for Councillors and Working Group Chairs to provide an annual review of their work to constituencies.

    iii.   Developing a similar framework of accountability for ccNSO Councillors as is in place with the ICANN Board of Directors (e.g., individuals or the entire Board can be called for replacement).

[AF] Employing Council team-building exercises including activities and events to increase motivation and promote cooperation could enhance the level of Councillor engagement and help them work effectively together as a team.

It is worth noting here that some respondents indicated that fewer Councillor seats would enhance the quality and consistency of engagement but other respondents indicated that more Council seats are needed to better represent the diverse membership. There are pros and cons to both strategies but as the IE, we do not see evidence that merits a change in the number of Council seats.

Council Elections

A primary Council accountability mechanism is the election process, but this was reported by some respondents as an underutilized tool. In the past five years (2015-2019), only two of 30 Council seats received more than one nominee.[82] Members are not able to vet their Councillors without an election process, and candidates have little incentive to prove their qualifications or share a platform of ideas if running unopposed. The same issue holds for re-elections: Councillors are frequently re-elected due to a lack of opposing candidates and, as some interviewees suggested, a lack of interest amongst their constituents: many members invest little in the affairs of the ccNSO if they do not perceive a significant problem. There are no term limits for ccNSO Councillors.

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[81] Much of this information is available in the Guideline on ccNSO Council Roles and Responsibilities. However, the specific roles of a given Councillor – and associated expectations and time commitment – are not determined until after a Councillor has taken office.
Guideline: ccNSO Council Roles and Responsibilities. (2018, February). Retrieved from
https://ccnso.icann.org/sites/default/files/field-attached/roles-responsibilities-council-26feb18-en.pdf
[82] The ccNSO Council Elections. (2018). Retrieved from
https://ccnso.icann.org/it/about/elections/council.htm.

When the IE observed the ccNSO Council meeting on 14 March 2019 at ICANN64, the ccNSO Secretariat and the ccNSO Council were unable to recall or locate their Chair and Vice-Chair(s) election procedure. As a result, the ccNSO Secretariat developed an election procedure and displayed it for the Council during their meeting. This caused Councillors to raise questions and express confusion about the election procedure. It later came to the reviewer's attention that procedures for ccNSO Chair and Vice-Chair elections are included in the "ccNSO Council Roles and Responsibilities" guideline. The guideline was posted on the ccNSO website at the time of ICANN64, though it was an outdated version: an updated guideline was adopted by the Council on 26 February 2018 and was not published to the ccNSO website until 26 March 2019 (after the 14 March 2019 election at ICANN64).[83] As shared by the Chair on 27 March 2019, the Council usually reviews Chair and Vice-Chair election procedures to remind Councillors of the process, as indicated in the Draft Agenda from the last Chair/Vice-Chair Elections during the ccNSO Council Meeting on 14 March 2018.[84] However, the ccNSO Council and Secretariat did not reference the adopted Guideline in their agenda or election process at the 14 March 2019 Council meeting.

It is important to note the context of this finding and to recognize that SO/ACs, including the ccNSO, are still in the process of implementing CCWG-Accountability WS2 recommendations, which suggest codifying and documenting procedures and decision-making:

> 6.1.1 SO/AC/Groups should document their decision-making methods, indicating any presiding officers, decision-making bodies, and whether decisions are binding or nonbinding

> 6.1.2. SO/AC/Groups should document their procedures for members to challenge the process used for an election or formal decision.

> 6.1.3. SO/AC/Groups should document their procedures for non-members to challenge decisions regarding their eligibility to become a member.

> 6.1.4. SO/AC/Groups should document unwritten procedures and customs that have been developed in the course of practice, and make them part of their procedural operation documents, charters, and/or Bylaws.[85]

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[83] Guideline: ccNSO Council Roles and Responsibilities. (2018). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/roles-responsibilities-council-26feb18-en.pdf

[84] Draft Agenda (version 2) and Daft Resolutions ccNSO Council Meeting. (2018, March). Retrieved from https://community.icann.org/display/ccNSOCWS/15+March+-+San+Juan?preview=/79437088/83329178/Update%20Agenda%20and%20resolutions%20ccNSO%20Council%20Meeting%2014%20March%20version%202.pdf

[85] Recommendations to Increase SO/AC Accountability. P. 27. CCWG-Accountability-WS2 Final Report (2018, March). Retrieved from https://www.icann.org/en/system/files/files/ccwg-acct-ws2-final-27mar18-en.pdf

While there are documented guidelines for the ccNSO Council Election Procedure, these do not describe the procedure for electing Chairs or Vice-Chair(s). These are only described in the guideline mentioned above, "ccNSO Council Roles and Responsibilities," which is a somewhat inaccurate title. Whereas the title of the "Council Election Procedure Guidance" document would seem to indicate it provides guidance on Chair and Vice-Chair(s) election procedure; however, it does not. At the time of this Assessment Report, the "Council Election Procedure Guideline" document available on the website is characterized as a draft.[86] Upon further investigation, the ccNSO Council website Decisions and Resolutions page indicates that the ccNSO Council "resolved to adopt the proposed Guideline: ccNSO Council Election Procedure" on 26 February 2018.[87] However, it seems the final adopted Guideline was posted to the website on 26 March 2019.

> **Finding:** It appears that the inability to locate the appropriate Guideline for the recent ccNSO Vice-Chair election process stemmed from unclear file-naming and lack of consistent file storage and sharing.
>
> > **Recommendation [12]:** The ccNSO Secretariat, in collaboration with the ccNSO Council, should review the process for naming, filing, and uploading documents to the website to ensure a clear, transparent, and efficient process going forward. Standardizing information through templates, tagging, and automation could help improve the efficiency and transparency of information and accessibility.

Member Veto Power

All Council decisions are subject to the possibility of members' veto. The 2004 Rules of the ccNSO state that a ratification vote on a ccNSO Council decision can be triggered within seven days of publication of the Council's decision by 10% or more of the ccNSO members.[88] This procedure has never been employed. A few interviewees indicated that this rule has become a challenge as the ccNSO has grown to 172 members: the 10% threshold is much more difficult to

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[86] Guideline: ccNSO Council Election Procedure. (2017, August). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/guideline-ccnso-council-election-procedure-31aug17-en.pdf

[87] Council Decisions and Resolutions. Retrieved from https://ccnso.icann.org/en/about/council/decisions-resolutions/2018

[88] Rules of the ccNSO, Version 1. (2004, December). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_25723/ccnso-rules-dec04-en.pdf.

meet today, particularly in a seven-day window, than it was when the rule was instituted (in 2004, the ccNSO had 45 members).[89] This view may not be representative: only 8% of survey respondents agreed that the current threshold is too high; approximately one-third had no opinion or did not know; and a few respondents wrote that they did not know of the existence of this rule—another indicator of lack of understanding about these mechanisms which can be detrimental to perceptions of ccNSO accountability (*Figure 18*).

Suggestion:

> **[AG]** In order for members to have a reasonable chance of vetoing a decision they do not agree with, some respondents suggested the time period (currently seven days) needs to be extended to 10-14 days. Respondents indicated that organizing 17 ccTLDs (10%) around the world to come together to veto something within seven days is not adequate time, although most respondents indicated that the threshold (10% of membership) still seemed reasonable. We suggest the ccNSO takes up this discussion and further explores this possibility.
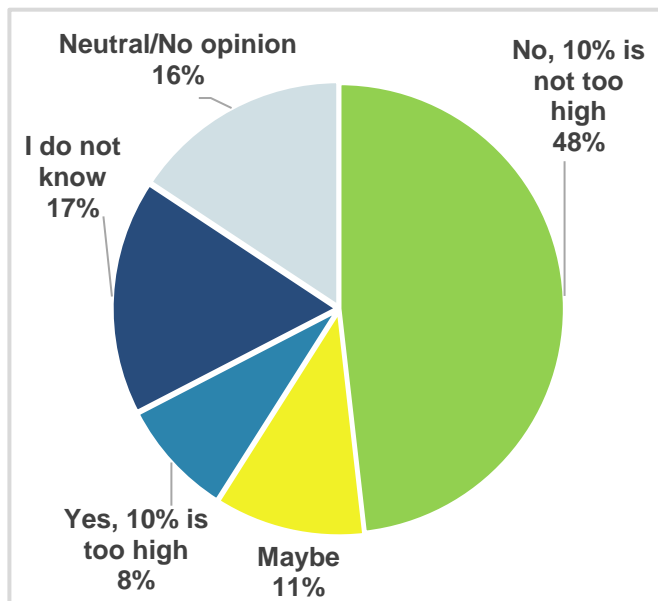
Other Council Accountability Mechanisms

To increase transparency and accountability regarding Council activities and Councillor participation, the ccNSO has implemented other measures such as public attendance logs of Council meetings (posted online since 2016).[90] Minutes of Council meetings must be posted publicly per the ICANN Bylaws,[91] and draft Council agendas must be published at least seven days in advance of a Council meeting, although the Council may adjust the draft agenda between the time of

Figure 18. Survey Question: Do you think that the 2004 ccNSO rules, which require 10% or more of the members to call a vote to veto a Council decision within 7 days of publication, is too high a threshold for a group with over 170 current members? N=83

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[89] ccNSO Membership overview. (2018, November). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/membership-12nov18-en.pdf.

[90] Attendance. (2018). Retrieved from https://ccnso.icann.org/en/about/council/attendance.htm.

[91] ICANN Bylaws, Article 10, Section 10.3(n). (2018, June). Retrieved from https://www.icann.org/resources/pages/governance/bylaws-en/#article10

publication and meeting.[92] Some respondents observed that this happens frequently, and those updated agendas are not sent in advance to members. While respondents did not see this as an immediate challenge, they expressed concern that it could set a precedent within the ccNSO and other ICANN bodies, thereby eroding transparency and accountability over time and across the system.

ICANN and ccNSO rules have established formal procedures for removing Councillors for serious causes that are not resolved through mediation. A ccNSO Councillor may be removed by:

- 66% of the ccNSO Council if the Councillor has not attended three consecutive Council meetings without sufficient cause or for grossly inappropriate behavior (Article 10.3(f), ICANN Bylaws)
- a majority of ccNSO members in the Councillor's geographic region following a vote initiated by at least 25% of the ccNSO members from that region (ccNSO Elections Procedures, enacted in August 2017)[93]
- a three-quarter majority vote of all ccNSO Councillors (ccNSO Elections Procedures)

Finding: The ccNSO Council does not always adhere to the ccNSO Council Practices Guideline with respect to publishing confirmed Council agendas seven days in advance of a Council meeting.

> **Recommendation [13]:** The ccNSO Council should adhere to the ccNSO Council Practices Guideline. If the guidelines for Council agendas are too restrictive or impractical to follow, then the Guideline should be updated to reflect practices that are sustainable, keeping in mind members' interest in continued transparency and accountability.

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[92] Guideline: ccNSO Council Practices, Version #1. (2017, January). Retrieved from https://ccnso.icann.org/sites/default/files/file/field-file-attach/2017-04/guidelines-council-practices-09feb17-en.pdf.

[93] Guideline: ccNSO Council Election Procedure (2017, August). Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/guideline-ccnso-council-election-procedure-31aug17-en.pdf.

Independent Reviews

Some respondents underscored the importance of continuing to have independent reviews in order to continue meeting the ccNSO's goal of being accountable to the community. "Independent reviews are an important accountability mechanism that should be preserved because it allows time for members to reflect on what they do and why," a respondent shared. Upon the completion of the last review in 2010, the RWP provided its recommendations for implementation of the review's recommendations,[94] and a final detailed ccNSO Improvements Implementation Project Plan was published in 2013 to provide a status update.[95] The review process is in itself transparent and oriented towards gathering the reflections and recommendations of the community, amplifying the role of independent reviews as a tool for member engagement, bottom-up input on continuous improvement measures, and accountability.

> **Finding:** Considering the number of respondent statements that discussed the level of transparency of information being shared on various mailing lists, it would have been helpful to be able to independently verify this information in order to make more informed recommendations.
>
>> **Recommendation [14]:** We recommend that for future ccNSO reviews, the Independent Examiner have access to archived mailing lists for the period in review and/or be able to join as an observer to the mailing lists for the period of the review. **NOTE:** the Process Proposal for Streamlining Organizational Reviews[1] is currently out for public comment through 15 July 2019. This is an opportunity for the ccNSO to provide input to inform the organizational review process.

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[94] Review of the Country Code Names Supporting Organization (ccNSO) Final Report of the ccNSO Review Working Party. (2011, March). Retrieved from https://www.icann.org/en/system/files/files/ccnso-review-wg-final-report-04mar11-en.pdf.

[95] ccNSO Improvements Implementation Project Plan. (2013, September). Retrieved from https://www.icann.org/en/system/files/files/improvements-implementation-plan-11sep13-en.pdf.

ICANN to ccNSO and ccNSO to ICANN Accountability

Many respondents characterized one of ccNSO's main roles and functions as sharing respective responsibility for keeping ICANN accountable to the global multistakeholder Internet community through the ccPDP and the ccNSO's participation on the ICANN Board, on the NomCom, and through the EC. As one interviewee described this, the ccNSO has the responsibility to be a "good citizen" within ICANN. A respondent shared an example of this accountability role, describing when the ccNSO raised concerns about ICANN's annual budgeting process to allow for comparison across different fiscal years. This feedback was eventually taken on board by ICANN staff and now other SOs are more actively engaged in ICANN's budgeting transparency and accountability.

Remaining Accountability Matters

The following topics were frequently raised by respondents but do not fall entirely within the scope of the ccNSO to address. We include them here because they comprise part of our findings and with the understanding that these findings are not something the ccNSO alone can remedy.

ccTLD-gTLD Affiliations

One commonly-mentioned issue related to transparency was that ccTLD managers are not required to report their affiliations. This arose in particular as a concern regarding the overlap between ccTLD managers who also manage gTLDs. The ccNSO does not have the authority to establish such a rule and ccTLDs would have no obligation to be accountable to respecting it. However, it is included here as a finding of the review as something that respondents indicated has an impact on their perceptions of transparency and accountability within the ccNSO.

Suggestion:

> **[AH]** While not enforceable by the ccNSO, some respondents suggested that ccNSO members create a voluntary reporting initiative to share affiliations and to indicate ccTLD goals in relation to following good practices; this could help foster greater transparency and accountability among the ccTLD community.

ccTLD Financial Contributions to ICANN

While the financial contributions of ccTLDs to ICANN are explicitly outside of the scope of this independent review, a clear majority of respondents brought up the topic of financial contributions in relation to questions about accountability. Therefore, it may be an important conversation for the ccNSO to continue having, in whatever form the ccTLDs see fit, given the emphasis put on the topic over the course of this review by many respondents from within the ccNSO. A Guideline for Voluntary Contributions of ccTLDs to ICANN was passed in November 2013, which includes a provision to review the Guideline after a minimum period of

five years.[96] That minimum five-year period has now eclipsed, and as such this is an issue likely to be revisited by ICANN and the ccNSO.

Concluding Remarks

This report contains important and valuable findings and ideas from the ccNSO and surrounding community on ways the organization can fulfill its purpose, improve its structure and operations, and enhance its accountability. Based upon the findings, our overall determination is that 1) the ccNSO has a continuing purpose; 2) there do not seem to be a need for major structural or operational changes; 3) the ccNSO is accountable to its constituents, including its members and the broader ICANN community.

While no significant changes are anticipated, the findings, suggestions, and recommendations indicate there are opportunities for the organization to continuously improve as it works to achieve the three objectives above.

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[96] Guideline for Voluntary Contributions of ccTLDs to ICANN. (2013, November). Retrieved from https://ccnso.icann.org/sites/default/files/filefield_42805/guidelines-cctld-contributions-27nov13-en.pdf.

Appendices

Appendix 1 | List of Recommendations

CONTINUING PURPOSE

Finding: To address the findings regarding the ccNSO's ongoing continuing purpose, the ccNSO will need to involve next generation ccTLD managers and ensure that ccNSO work and meetings remain relevant.

Recommendation [1]: The ccNSO should develop communications materials (including talking points) that clearly articulate the value of the ccNSO to potential new and current ccNSO members.

STRUCTURE & OPERATIONS – WORKING GROUPS AND COMMITTEES

Finding: There is an opportunity to better evaluate the merit of potential working group candidates in the event of more applicants than available spaces, thereby fostering more diverse participation and leadership.

Recommendation [2]: the ccNSO Council should amend the "Information received from nominees" section of Annex B of the Guideline: ccNSO Working Groups to request that all applicants submit a short biography. The following Guideline section, "Initial selection of candidates" should be amended to indicate that biographies are anonymized by the ccNSO Secretariat before sharing with Councillors for a confidential ranking of candidates.

Finding: There is perceived lack of transparency and standardization around the selection process for Working Group members and Chairs.

Recommendation [3]: the ccNSO should update Section 3.5 of the Guideline: ccNSO Working Groups to clearly articulate and standardize the process for nominating and appointing Working Group Chair(s).

Finding: The ccNSO's participation in the IANA Naming Function Review Team should not be impaired due to fluctuations in the number of ccNSO members and non-members.

Recommendation [4]: the ccNSO should request a change in the Bylaws requirement for the IANA Naming Function Review Team, which requires two ccNSO members and one non-member. **NOTE:** This request was made to the ICANN Board[97] on 12 April 2019

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[97] Correspondence: Composition of the IANA Functions Review Team: proposed ICANN Bylaws change. (2019, April) Retrieved from https://ccnso.icann.org/sites/default/files/field-attached/sataki-to-chalaby-12apr19-en.pdf

and, as the IE, we concur. We recommend that the three seats on the IANA Naming Function Review Team be geographically diverse and membership-neutral.

STRUCTURE & OPERATIONS – CCNSO COUNCIL

Finding: The number and diversity of people involved in the ccNSO Council could be improved.

> **Recommendation [5]:** the ccNSO should limit the number of consecutive terms a Councillor can serve. In regions with fewer members to draw upon and/or in the case of no willing volunteers seeking election, this requirement could be waived for that term. **NOTE:** a more restrictive version of this recommendation was made in the 2010 ccNSO Review that did not take into consideration diverse regional contexts which may prevent a region from cultivating new candidates. The recommendation was not adopted due to lack of feasibility across all regions.[98]

STRUCTURE & OPERATIONS – BARRIERS TO PARTICIPATION

Finding: It is important to engage a diversity of voices through varied, interactive meeting formats to enable participation from people who are not as comfortable standing up with a microphone in front of the membership.

> **Recommendation [6]:** the ccNSO Meetings Programme Committee should develop and adopt meeting formats to allow more varied interaction between participants at ICANN meetings (e.g., small regional group discussions followed by small group topical discussions). **Suggestion R** includes several ideas for implementing this recommendation.

Finding: The lack of real-time scribing of ccNSO Members Day meetings presents a barrier to participation for remote participants and non-native English speakers.

> **Recommendation [7]:** ICANN should provide real-time scribing of ccNSO Members Day meetings. As the Independent Examiner, we recognize that addressing this finding is outside of the ccNSO alone to remedy.

STRUCTURE & OPERATIONS – ORIENTATION AND ONBOARDING

Finding: Many respondents indicated that more could be done to enhance the orientation and onboarding of new and newer (< 2 years) ccNSO members as well as newly-elected leaders.

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[98] Organizational Review of ICANN's Country Code Names Supporting Organization (ccNSO). Final Report. https://www.icann.org/en/system/files/files/items-ccnso-organisational-review-15jun10-en.pdf

Recommendation [8]: The written ccNSO course on the ICANN Learn portal should be translated into all ICANN languages.

Recommendation [9]: We recommend streamlining the mentorship program to more efficiently connect mentors and mentees. Recognizing the need for mentors may be greater than the availability of them, there may be efficiencies gained through group mentoring and/or dedicating face-to-face time at ICANN meetings for mentors and mentees to connect.

Recommendation [10]: Resources for newcomers (including multi-lingual ICANN Learn ccNSO portal materials) should be assembled into one location that is prominently featured and easily accessible on the ccNSO website.

ACCOUNTABILITY – ACCESSIBILITY AND TRANSPARENCY OF INFORMATION

Finding: Many of the findings related to accessibility and transparency of information are rooted in challenges with the current ccNSO website. As the Independent Examiner, we also experienced difficulty in trying to locate documents on the website for fact-checking. Lack of easy access to information also presents a barrier to participation.

Recommendation [11]: We recommend the ccNSO website should be redone as soon as possible. It is one of the more (if not the most) outdated SO/AC websites yet it is a key tool that supports accountability, transparent communication, and efficient operations.

ACCOUNTABILITY – ACCOUNTABILITY OF THE CCNSO COUNCIL

Finding: It appears that the inability to locate the appropriate Guideline for the recent ccNSO Vice-Chair election process stemmed from unclear file-naming and lack of consistent file storage and sharing.

Recommendation [12]: The ccNSO Secretariat, in collaboration with the ccNSO Council, should review the process for naming, filing, and uploading documents to the website to ensure a clear, transparent, and efficient process going forward. Standardizing information through templates, tagging, and automation could help improve the efficiency and transparency of information and accessibility.

Finding: The ccNSO Council does not always adhere to the ccNSO Council Practices Guideline with respect to publishing confirmed Council agendas seven days in advance of a Council meeting.

Recommendation [13]: The ccNSO Council should adhere to the ccNSO Council Practices Guideline. If the guidelines for Council agendas are too restrictive or impractical to follow, then the Guideline should be updated to reflect practices that are sustainable, keeping in mind members' interest in continued transparency and accountability.

ACCOUNTABILITY – INDEPENDENT REVIEWS

Finding: Considering the number of respondent statements that discussed the level of transparency of information being shared on various mailing lists, it would have been helpful to be able to independently verify this information in order to make more informed recommendations.

> **Recommendation [14]:** We recommend that for future ccNSO reviews, the Independent Examiner have access to archived mailing lists for the period in review and/or be able to join as an observer to the mailing lists for the period of the review. **NOTE:** the Process Proposal for Streamlining Organizational Reviews[99] is currently out for public comment through 15 July 2019. This is an opportunity for the ccNSO to provide input to inform the organizational review process.

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[99] Process Proposal for Streamlining Organizational Reviews, Public Comment. See: https://www.icann.org/public-comments/streamlining-org-reviews-proposal-2019-04-30-en

Appendix 2 | List of Suggestions

Continuing Purpose – Contributions to ICANN Governance

[A] Some respondents suggested more education is needed within the ccNSO community so that it is engaged in its responsibilities of the multi-stakeholder model, including the EC, which would also help better distribute the work.

[B] It may be helpful to review whether there is a need for redundancy in communications to EC Administration representatives from each supporting organization.

Continuing Purpose – Internet Functionality and Stability

[C] Spam is an increasing problem that is not gaining enough attention. Since spam is a content and context specific problem, this could be a topic to foster sharing of ccTLD knowledge and best practices.

[D] Other SO/ACs would benefit from hearing ccNSO member experience and advice on how they address issues of privacy and security *(see **Community of Practice** and **Knowledge Exchange**)*

Continuing Purpose – Community of Practice & Knowledge Exchange

[E] There is a need for a single information knowledge hub among SO/ACs and other internet-related bodies so that stakeholders have access to trusted information in a centralized place.

[F] The ccNSO could coordinate a more systematic way of capturing, retaining, and sharing institutional and experiential knowledge. This could include, for example:
- i.   Documenting interviews with past leaders and founding members.
- ii. Fostering more dialogue between ccNSO and other SO/ACs and constituency groups within ICANN—many of whom expressed interest in learning from ccNSO members' experience.

[G] Capacity building and training for newer, lesser-developed, and/or smaller ccTLDs was also identified as a key role the ccNSO could expand upon. Specifically, this could include:
- i.   Creating a capacity building group for newer, lesser-developed, and/or smaller ccTLDs to regularly exchange information.
- ii. Using some ccNSO meeting time for participatory exchange in addition to the conference-format presentations and discussion. For example, the capacity building sessions at the ccNSO Meeting at ICANN47 in Durban, 2013.

Structure & Operations – Activities and Procedures

[H] Many respondents recognized that for the ccNSO to remain responsive and effective as its membership grows, it will need to re-examine processes and rules that worked well with a

smaller group but that do not scale well. The Independent Examiner understands that the Guidelines Review Committee is already working on this and supports this effort.

Structure & Operations – Policy Development

[I] While PDPs are used infrequently, a couple of respondents indicated that adhering to timeframes to complete the PDP would help ensure an efficient process, similar to the expedited PDP developed to address compliance with GDPR.

Structure & Operations – Working Groups and Committees

[J] While there is no way to control Councillors' vote on working group nominations, we encourage the ccNSO Council and members to consider placing more attention on cultivating new, next generation leaders in the nomination and appointment processes for working group members and Chairs.

[K] To create opportunities for next generation leadership amongst Working Group Chairs, the ccNSO could adopt a procedure for individuals to volunteer for Chair positions and follow a similar anonymized evaluation and ranking of short biographies as described in Recommendation 2.

[L] While many Working Groups already record meeting attendance and minutes, it may be helpful to mandate this in the Working Group Guidelines and ensure the information is made accessible to others in order to better foster awareness among the ICANN community.

Structure & Operations – Regional Organizations

[M] To address respondents' indications that it would be helpful to better engage Regional Organizations, there may be a need to improve understanding among ccTLD managers about how much, and in what ways, Regional Organizations can be involved in the ccNSO.

Structure & Operations – ccNSO Council

[N] Processes should be designed for ccNSO action and these could be further automated using suitable tools. These automated processes would help with information flow, both between members, but also to help explain the ccNSO's mission and activities to the outside world. For instance, if there were standard templates (or "building blocks") for workplans, working group sites, and wikis to consistently organize information, a user could very quickly find what they are looking for. This is a design solution, but also a mentality shift in terms of standardizing and streamlining the different sub-components of the ccNSO.

[O] The perceived lack of transparency of the NomCom ccNSO Council nominees was raised by several participants. While there was no clear agreement over how to address this issue, it is clear that there is room for continuous improvement. This could entail a change in the Bylaws

that provides the ccNSO Council or membership with some recourse if they collectively deem a NomCom nominee to be inappropriate.

[P] The Guidelines Review Committee is working on implementation of WS2 recommendations on diversity and accountability. As this work gets underway, it may be valuable to consider ideas to foster Councillor diversity. This could include, for instance:

  i.   creating subgroups to share experiences and promote mentorship of next generation leaders (e.g., women of the ccNSO);
  ii.   mandating 2/18 Council seats be filled by newcomers (< 2 years membership)

Structure & Operations – Barriers to Participation

[Q] Several respondents suggested the Meeting Programme Standing Committee could make ccNSO Members Day meetings more dynamic in terms of the topics covered and the processes used, with a greater emphasis on fostering interaction. For example, the Members Programming Committee might consider the following respondent ideas:

  i.   Utilize the mailing list to poll/collect expressions of interest on topics affecting ccTLDs and orient part of the Members' Day meetings to address those high-interest and timely topics.
  ii.   Offer 15-minutes of rapid-fire Q&A sessions to allow people to raise topics of interest or questions they may have that could spark a conversation following the meeting.
  iii. Use polling software to collect ideas, feedback, generate discussion (beyond the color cards for gauging temperature of the room), which may help to engage people more actively.
  iv.   For the third meeting of the year, reserve the second ccNSO Members' Day meeting for different programming such as:
    a. Cross-community sessions. For instance, ccNSO-hosted workshops for GNSO colleagues to learn about policies and legal initiatives used by ccTLDs that could inform best practices for gTLDs; and/or,
    b. Using a similar format to Tech Day but for Policy, Legal, or Communications discussions, which are also important topics for ccTLDs to exchange knowledge, perhaps informed by a poll in advance of planning for Tech Day to collect community input on timely topics for discussion.

[R] Several respondents suggested more could be done to build interest and capacity among the next generation of ccNSO leaders, especially from low- and middle- income countries. This could include:

  i.   providing ccNSO communications materials to Regional Organizations to encourage them to connect with those who cannot attend ICANN meetings.
  ii.   ccTLD managers training and rotating representatives to the ccNSO and participation in ccNSO Members' Day meetings and working groups (to the extent appropriate for that ccTLD context).

Structure & Operations – Orientation and Onboarding

[S] Offer a simple, jargon-free orientation webinar training(s) about what is required, what to expect, and how to engage in the ccNSO (the ICANN | Learn portal offers a course about the ccNSO, but all information is presented in writing rather than in a webinar format).

[T] Develop an easy-to-read overview packet of materials for new members that could include the work and the role of the ccNSO in relation to the entire ICANN policy and practice ecosystem (e.g., a Beginner's Guide to the ccNSO, similar to the ones provided on icann.org which are also translated into multiple languages).

[U] Expand a mentorship program between larger/more experienced ccTLDs and smaller/newer members or individuals.

[V] Create a similar process to the ICANN 101 sessions for ccNSO members and participants.

[W] Creating a ccNSO "Hall of Fame" would provide an opportunity to teach newcomers about the history of the DNS and the pioneers of innovation while also encouraging ccNSO members and leaders to engage by offering a way to recognize their contributions over time.

Accountability – Accessibility and Transparency of Information

[X] Overall, respondents suggested more needs to be done on the *communications* side of transparency of information to help orient newer or less engaged members and participants to what information is available and what is happening on a more regular basis. Ideas for doing this included:
   i.   Finding ways to better consolidate and package information to provide regular but concise updates; making clear distinctions between background information vs. resolutions for consideration; and hyperlinking to any references used.
   ii. Using communication channels (mailing list, newsletter) to announce when and where documents are published to the website since many respondents found it difficult to locate documents or were unaware they exist.
   iii. Using the wiki to communicate latest information from the ccNSO's work including notes taken on ccNSO calls for those that wish to review but may have missed the email.
   iv. Creating a glossary of terms (similar to the retirement PDP) could help clarify and communicate terminology that may be unfamiliar to newer members and participants.

[Y] For external communications, some respondents suggested the ccNSO could:
   i.   Better communicate its roles and the limitations to governments, policymakers, and other stakeholders; this would improve transparency of information while also raising awareness of the ccNSO.
   ii. Improve the ccNSO's leverage of social media tools to engage the ccTLD community.

     iii.   Provide a tool for tracking the ccNSO's responsiveness and efficiency in relation to the EC responsibilities acquired in the IANA transition.

[Z] Considering the ccNSO website is scheduled for a re-design along with other SO/ACs, when the time comes, the ccNSO may want to consider convening a Working Group to develop priorities for the new website. Some suggestions included for the new website included: designing for offline/low-bandwidth access and considering accessibility from different devices and browsers. Since web design decisions usually entail trade-offs and budget implications, it may be helpful for the ccNSO to initiate discussion on its top priorities for the new site once the redesign schedule is made clear.

[AA] Similar to the communications recommendations under 'Accessibility and Transparency of Information', some respondents asked for improved communication between the ccNSO Councillors and members and non-members through the use of widespread, accessible technology tools and social media platforms that would better connect members with constituencies outside of the meetings. [**Note:** the IE does not have access to ccNSO mailing lists or archives and cannot independently assess the degree of transparency around communications between Councillors and ccNSO members.]

[AB] Some respondents suggested the Council should enable greater member participation, for instance, by making all working documents available to the membership. Most working documents, due to the frequency of changes, are not currently publicly posted, but documents for discussion and approval as well as meeting recordings are available in the ccNSO Council Workspace.

[AC] For parties that want to communicate with ccTLDs regarding policy development and technical coordination, the ccNSO could help clarify external communications regarding the pathways for receiving non-member input, which may be unclear to those outside of the process.

Accountability – Accountability of the ccNSO Council

[AD] Recognizing inconsistent Councillor engagement is a challenge, it may be valuable to first understand the reasons behind lack of engagement before designing solutions for it. Conducting a survey among past and present Councillors could help identify any barriers to participation. This understanding could then inform the Council election process (making expectations and time commitment clear to nominees) and inform potential solutions to enhance Councillor engagement.

[AE] Several respondents suggested some form of performance metrics for Councillors, for instance:
     i.   A maximum number of Councillor absences from meetings, after which they lose voting rights or alternatively, must resign.

    ii.   Developing an assessment mechanism for Councillors and Working Group Chairs to provide an annual review of their work to constituencies.

    iii.   Developing a similar framework of accountability for ccNSO Councillors as is in place with the ICANN Board of Directors (e.g., individuals or the entire Board can be called for replacement).

[AF] Employing Council team-building exercises including activities and events to increase motivation and promote cooperation could enhance the level of Councillor engagement and help them work effectively together as a team.

[AG] In order for members to have a reasonable chance of vetoing a decision they do not agree with, some respondents suggested the time period (currently seven days) needs to be extended to 10-14 days. Respondents indicated that organizing 17 ccTLDs (10%) around the world to come together to veto something within seven days is not adequate time, although most respondents indicated that the threshold (10% of membership) still seemed reasonable. We suggest the ccNSO takes up this discussion and further explores this possibility.

Accountability – Remaining Accountability Matters

[AH] While not enforceable by the ccNSO, some respondents suggested that ccNSO members create a voluntary reporting initiative to share affiliations and to indicate ccTLD goals in relation to following good practices; this could help foster greater transparency and accountability among the ccTLD community.

Appendix 3 | Interview Guide

Note: Interviews were conducted in a semi-structured fashion, so interview questions varied slightly to allow opportunities for follow-up questions.

Introduction: Demographic questions

1. Name[100]
2. Affiliation(s) (gender/region/sector)
3. Involvement and role(s) within ccNSO: please describe your engagement with the ccNSO and your understanding of ccNSO's role within ICANN.
   a. *Length of engagement*
   b. *Past or current roles*
4. Are you involved in any other ICANN Supporting Organizations, councils, or committees or processes? If so, which ones?

Objective 1: Whether the ccNSO has a continuing purpose in the ICANN structure

5. What purposes or functions does the ccNSO provide, based upon your experience and observations?
6. Which of those purposes or functions do you see as most important and why? Least important and why?
7. From your perspective, keeping in mind the ccNSO's Bylaws and policy-development process, what, if any, additional purposes or functions could the ccNSO be providing? *(Potential follow-up questions: Why are those important/how feasible are they to implement?)*

Objective 2: Whether any change in structure or operations is desirable to improve the ccNSO's effectiveness

8. In what ways are the ccNSO's structure and operations most effective and why? Least effective and why?
9. From your perspective what, if any, structural and/or operational changes of the ccNSO would enhance its effectiveness and why? (*keeping in mind that final recommendations should adhere to the SMART criteria; What would be the intended effectiveness outcomes of those changes?*)

Objective 3: Whether the ccNSO is accountable to its organizations, committees, constituencies, and stakeholder groups

10. How would you describe the ccNSO's accountability to its constituencies and stakeholder groups?
11. What ccNSO accountability mechanisms should be preserved and/or expanded?

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[100] Interviewee names have been kept confidential by the IE, and other demographic information is only reported in the aggregate. Quotes or summaries included in the report are not attributed to particular respondents.

12. What, if any, new or additional accountability measures could the ccNSO pursue? *(Do you have specific suggestions for how it could improve its accountability?)*

Wrap-Up

Do you have any final questions or is there anything we have not asked you that you wished we had? (*If so, please discuss*).

Appendix 4 | Survey Questions

Demographic Information

1. Name: (*Providing your name is optional as the survey is confidential; however, we encourage you to provide your name so that we may ensure we do not receive duplicative answers and so we may follow-up with questions of clarification, as needed*) [Comment box]

2. Gender: [Multiple choice: ☐ Male, ☐ Female, ☐ Other, ☐ Prefer Not to Say]

3. Region: [Multiple choice: ☐ Africa, ☐ Asia Pacific, ☐ Europe, ☐ Latin America / Caribbean, ☐ North America]

4. Role(s): (*Choose all that apply*) [Multiple choice: ☐ ccNSO member, ☐ ccNSO participant (observer/non-member) ☐ ccTLD manager (ccNSO non-member), ☐ ccNSO Council, ☐ ICANN staff, ☐ ASO, ☐ GNSO Council, ☐ Stakeholder Groups & Constituencies, ☐ ALAC and RALOs, ☐ GAC, ☐ RSSAC, ☐ SSAC, ☐ ICANN Board member (current or former), ☐ Other [+ Comment box for elaboration on specific roles]

[***Survey structure***: *ccNSO members and Councillors were automatically directed to questions 5-9; ccNSO participants (observers/non-members) were automatically directed to questions 6b-9; all others skipped questions 5-9 and were automatically directed to question 10*]

Questions for ccNSO Participants

5. *[Note: seen by ccNSO members and Councillors only]* How long have you been involved in the ccNSO? [Multiple choice: ☐ 0-2 years ☐ 3-5 years ☐ 6-9 years ☐ 10+ years]

6. *[Option A, seen by ccNSO members and Councillors only]* Why did you join the ccNSO? (*Choose all that apply*) [Multiple choice: ☐ to learn about the ccNSO/ccTLD management, ☐ to learn about ICANN's policies and procedures, ☐ opportunity to network/build relationships, ☐ opportunity to learn new skills/management approaches for ccTLDs, ☐ opportunity to serve in a leadership position (for example, on the ccNSO Council, participate in work groups, on the ICANN Board), ☐ to be engaged in ccNSO policy development, ☐ oversight of IANA functions, ☐ Unsure, ☐ Other (*Please elaborate*) + Comment box]

   [Option B, seen by ccNSO non-member participants only] Please describe your motivations for not joining as a member of the ccNSO. [Comment box]

7. Do you feel that you have opportunities to actively engage in areas of work that interest you and/or that you think are important? ☐ Yes, I have opportunities to engage. ☐ No, I do not have opportunities to engage. I would actively engage if I had more opportunities. ☐ No, I do not have opportunities to engage. There is nothing I want to actively engage in. ☐ Other *(Please elaborate)* [Comment box]

8. What would make you more likely to volunteer within the ccNSO? [Comment box]

The following question was developed based upon comments, suggestions, and concerns received by interviewees.

9. To what extent are you satisfied with the ccNSO's organizational culture (i.e., what we do as a group and how we do it)? [Rating scale: 1-Very dissatisfied, 2-Dissatisfied, 3-Neutral, 4-Satisfied, 5-Very satisfied]
    a. What ideas, if any, do you have to enhance the ccNSO's organizational culture? [Comment box]

Continuing Purpose

10. Which of the following purposes of the ccNSO are most important from your experience and perspective? (*Choose all that apply*) [Multiple choice: ☐ Policy development, ☐ Internationalization of ICANN community, ☐ Information sharing/cross-learning, ☐ Generating collective security for ccTLDs, ☐ Oversight of IANA functions ☐ Other: (*Please elaborate*) + Comment box]

The following questions were developed based upon comments, suggestions, and concerns received by interviewees.

11. To what extent are you satisfied with how the ccNSO facilitates information and knowledge exchange? [Rating scale: 1-Very dissatisfied, 2-Dissatisfied, 3-Neutral, 4-Satisfied, 5-Very satisfied]
    a. What additional ideas, if any, do you have for facilitating information and knowledge exchange within the ccNSO? [Comment box]

12. To what extent, if any, do you see a need for enhancing the security, stability, and resilience of the ccNSO Secretariat's institutional knowledge? [Rating Scale: 1-No need, 2-Minor need, 3-Major need, 4-I do not know, 5-Neutral/No opinion + Comment Box]
    a. What ideas, if any, do you have for addressing this? [Comment box]

Structure & Operations

The following questions were developed based upon comments, suggestions, and concerns received by interviewees.

13. How important do you think it is to explore possible efficiencies in the structure and operations of the ccNSO Council? [Rating scale: 1-Not at all important, 2-Not important, 3-Neutral, 4-Somewhat Important, 5-Very Important]
    a) What ideas, if any, do you have for enhancing the efficiency of the ccNSO Council's structure and operations? [Comment box]

14. To what extent are you satisfied with the ccNSO's onboarding/orientation opportunities for individuals? [Rating scale: 1-Very dissatisfied, 2-Dissatisfied, 3-Neutral, 4-Satisfied, 5-Very satisfied + *comment box]*

15. To what extent are you satisfied with the opportunities for individuals to gain visibility within the ccNSO? [Rating scale: 1-Very dissatisfied, 2-Dissatisfied, 3-Neutral, 4-Satisfied, 5-Very satisfied

    a. What ideas, if any, do you have for enhancing opportunities for individuals to gain visibility within the ccNSO? [Comment box]

16. Do you think that the 2004 ccNSO rules, which require 10% or more of the members to call a vote to veto a Council decision within 7 days of publication, is too high a threshold for a group with over 170 current members? [Rating scale: 1-No, 10% is not too high, 2-Maybe, 3-Yes, 10% is too high a threshold, 4-I do not know, 5-Neutral/No opinion + Comment Box]

    a. What suggestions, if any, do you have for addressing this? [Comment box]

Accountability

The following questions were developed based upon comments, suggestions, and concerns received by interviewees.

17. To what extent do you see the growing overlap between ccTLD and gTLD managers (for example, a single company manages both gTLDs and ccTLDs and participates in both the ccNSO and GNSO) as a challenge for accountability and transparency? [Rating Scale: 1-Not a challenge, 2-Minor challenge, 3-Major challenge, 4-I do not know, 5-Neutral/No opinion + Comment Box]

18. To what extent, if any, do you see a need for enhancing the ccNSO's transparency and accountability? [Rating Scale: 1-No need, 2-Minor need, 3-Major need, 4-I do not know, 5-Neutral/No opinion + Comment Box]

    a. In what ways, if any, could the ccNSO better enhance transparency and accountability? [Comment box]

19. In what ways, if any, could the diversity and rotation of **individuals** in the ccNSO Council be enhanced? [Comment box]

20. In what ways, if any, could the level of engagement of individual ccNSO Councillors be made more consistent? [Comment box]

Final Page

Optional: If you have any additional comments related to the three criteria of the ccNSO review (continuing purpose, structure and operations, and accountability), please share them in the space below. [Comment box]

Appendix 5 | RWP Feedback on the Assessment Report

The Independent Evaluator would like to thank the Review Working Party (RWP) for their feedback on the draft Assessment Report. The RWP reviewed a draft of the report prior to and following ICANN64, primarily to validate the factuality of the findings. Their comments were condensed and edited for clarity and are included below along with explanations of the Independent Examiner's resulting actions of responses.

NOTE TO READER: *italicized "quoted text"* indicates an excerpt from the draft report, followed by non-italicized text that indicates feedback from the RWP. **Bold blue text** indicates the reviewer's response and action.

Excerpted Text, RWP Comments & Reviewer Response/Actions

1. Continuing purpose section: "*Interviewees emphasized that the ccNSO must improve its recruitment of new and younger people given that most of its participants have been involved for a long period of time.*" - The people active in the ccNSO come from the membership and so any action would need to be to encourage ccNSO members to identify new people to become active.
Response/Action: This is an important distinction and we agree that the current language is unclear on this point. We have adjusted the text.

2. Continuing purpose section: "*…whether ccTLD managers are the only audience for the ccNSO, or if there is a broader set of stakeholders that could be recruited for participation as non-member participants (for example, to contribute on Working Groups), or observers.*" – the WP has concerns about questioning the "audience" for the ccNSO. Some further exploration of these ideas might help us understand what was being proposed here. The Bylaws are clear about the membership of the ccNSO.
Response/Action: The spirit of this sentence was not to question the membership of the ccNSO; rather, it was posed as a potential way to increase the pool of people participating in the ccNSO since a principal vulnerability of the group as a volunteer organization is lack of participation and engagement. We have revised the text to clarify that this would be an option to engage non-member participants only, *not* **to grow the ccNSO's membership, which is only comprised of ccTLD managers.**

3. Continuing purpose section: "*… ICANN as a global organization that has the right and responsibility to manage the Internet*" - ICANN's mission is **not** to manage the Internet (and it certainly does not have rights and responsibilities for this!) The official wording is that it is "responsible for coordinating the global Internet's systems of unique identifiers."
Response/Action: Resolved. Thank you for identifying this issue. We note that it is factually incorrect, and we will update the wording accordingly. It is worth noting that this statement came from an interview respondent who is a current ccNSO Councillor.

4. Continuing purpose section: One of the main contributions of the ccNSO is its participation in the work of the Customer Standing Committee, which monitors the performance of the PTI of the IANA Naming Function against SLAs. How the IANA Naming Function is performed is critical to ccTLDs. As they are direct customers of the PTI, two out of four voting members on the CSC are appointed by the ccNSO.

Response/Action: We will add a paragraph to this effect in our findings report since it was raised as an important contribution by the RWP. It is worth noting that we have no references to the CSC in our interview and survey data.

5. Continuing purpose section: *"There are 249 ccTLDs, of which 171 are members of the ccNSO."* – Although both numbers are correct, together in this sentence they do not provide a full picture and disregards some of the nuances:
    1) Some entities manage two or more ccTLD (for example AFNIC and NORID) and have applied for only one ccTLD. There is only one entity managing two ccTLDs that is member for both and has therefore two votes.
    2) the total number of ccTLDs is comprised of traditional ccTLDs (as in the ISO 3166 list) and internationalised ccTLDs,
    3) under the current Bylaws, IDN ccTLD Managers cannot become members of the ccNSO,
    4) in many cases traditional ccTLDs and IDN ccTLDs are run by the same entity. Therefore, even though there are 249 ccTLDs, the number of entities considered ccTLD Managers is smaller.

Response/Action: Noted, thank you. We have added a reference to articulate these details at the first mention of this number in the report.

6. Continuing purpose section: *"The ccNSO helps to ensure that ccTLD managers can serve their local Internet communities."* – ccTLD managers do that with or without ccNSO.

Response/Action: Thank you, noted. We have added some more detail to clarify that this was referring to the ways that the ccNSO contributes to helping ccTLD managers serve their local internet communities (e.g., through providing a forum to share best practices). Many respondents saw these contributions as part of ccNSO's value and continuing purpose.

7. Continuing purpose section: *"IANA is the institution that runs TLDs*." – This is incorrect. IANA does not run TLDs.

Response/Action: Noted. We have clarified the language in the report.

8. Continuing purpose section: *"To become a member of the ccNSO, however, one must be a ccTLD manager – a designation approved and formalized through IANA"* – this is not correct. We suggest leaving the second part (*"a designation approved and formalized through IANA"*) out of the document.

Response/Action: Noted, we understand why there was some confusion and we have rephrased this.

9. It is suggested that somewhere of the finding report it is clarified that most if not all ccTLD managers are not persons but legal entities (academic institutions, not-profits, government agencies etc.)

Response/Action: Noted. We will add this to the report.

10. Continuing purpose section: "*The ccNSO, as the body within ICANN created for and by ccTLD managers, has advised ICANN on policies and functions relevant to the ccTLD community. It participated in the Cross Community Working Group (CCWG) to develop an IANA Stewardship Transition Proposal on Naming Related Functions when the IANA functions transferred from its historical contract with the United States Government to ICANN's stewardship (through affiliate PTI) in 2016. In addition, the ccNSO developed a Framework of Interpretation (FOI) to provide guidance regarding issues of delegation, transfer, and retirement of ccTLDs where no clear policy existed. relating to IANA.*" – again, each sentence individually might be correct but together they neither make sense, nor create a correct narrative as each mean something else. Plus, FoI was a policy effort that took place long before IANA Stewardship transition.

Response/Action: We have made some edits to this section for clarity, but we may need more specific guidance on how to best address this comment.

11. Continuing purpose section: *"On a more regular basis, through the standing Technical Information Gathering/Sharing Working Group (TechWG), provides information to the ccNSO and ccTLDs on issues relevant to IANA, and facilitates discussions within the ccNSO on issues."* – the primary goal of the Tech WG nowadays is to organise the Tech Day that takes place at each ICANN meeting. They do not monitor IANA. It is done via the CSC.

Response/Action: Thank you, noted. This information was drawn from the [TechWG Charter](#) which (amongst other activities) states that it "shall liaise with IANA and monitor the ccTLD related services provided by IANA; make recommendations with regards to the provision of these services; provide information and input to the ccNSO and ccTLDs on matters of relevance to IANA and ccTLDs; and facilitate discussions on issues relating to IANA." We have updated the findings to be in accordance with RWP guidance, but it is worth noting that perhaps the TechWG Charter is outdated.

12. Continuing purpose section: *"In addition to policy Working Groups, the TechWG provides the ccTLD community with advice and shares information on technical and operational aspects of managing a ccTLD."* – Tech WG does not do that anymore.

Response/Action: Thank you, we will note this in the report.

13. Continuing purpose section: *"It has a history of organizing a technical, cross-community workshop (Tech Day) at ICANN meetings"* – TechWG does organise Tech Day. TechWG's charter needs to be updated to reflect the reality.

Response/Action: Thank you, noted.

14. Continuing purpose section: *"TLD-OPS covers more than 65% of all ccTLDs"* – Suggested change: "TLD-OPS includes more than 65% of all ccTLDs"

Response/Action: Thank you, we used the terminology on the [TLD-OPS site](#) but will update the language in the report.

15. Continuing purpose section: The number 65% [see Comment #14] does not reflect the reality as the number is distorted by some entities managing multiple ccTLDs and in this case even providing back-end services.

Response/Action: Noted. This information was drawn from the ccNSO website. We included a footnote reference to include this nuance.

16. Continuing purpose section: *"Through TLD-OPS, ccTLD managers may run workshops on specific security topics"* – Suggested change: "ccTLD managers have run workshops."

Response/Action: Noted, we have updated this language.

17. Continuing purpose section: Critical to scope of activities of the ccNSO is that the ccNSO may engage in all kinds of activities authorized by its members (ICANN Bylaws Section 10.1, final paragraph, second sentence)

Response/Action: Noted. It was included in a footnote but given the importance we put it into the main text.

18. Continuing purpose section: *"Even though the ccNSO cannot impose guidelines for ccTLD management, interviewees emphasized that it can still serve as a facilitator to help ccTLD managers learn from each other and reach consensus."* – the ccNSO is not a consensus-driven body.

Response/Action: Thank you, noted. Many respondents used the term "consensus" in the interviews, and the ICANN Bylaws state that one of the ccNSO's responsibilities "Nurturing consensus across the ccNSO's community, including the name-related activities of ccTLDs." However, we also recognize there can be a lack of unified understanding/agreement of what consensus means. We used the term consensus seven times in the findings report based upon the data, so this is not the only instance. Please advise on whether additional changes are needed.

19. Structure and operations section: *"Guidelines should be adopted in accordance with the Bylaws"* – This is not incorrect, as the Bylaws say that the ccNSO may adopt whatever internal rules and procedures it deems necessary, but it is not clear why it this sentence is mentioned there. The guidelines are adopted by the ccNSO Council, but an internal rule may not be in conflict with the Bylaws (see s=Section 10. 3. (k))

Response/Action: If this is not factually incorrect we do not plan to remove it from the findings report. It was included to clarify that although Guidelines are intended to be more flexible governance documents that reflect the working methods and practices of the ccNSO, they cannot be in conflict with the Bylaws. The language that a guideline "is adopted in accordance with the Bylaws" is drawn from Guidelines themselves, which nearly all state the section of the Bylaws with which they are aligned. We would welcome a specific recommendation on what should be added or changed here.

20. Structure and operations section: "*An exception noted by some interviewees are the Bylaws: certain provisions are outdated and difficult to adhere to today but are difficult to change. For example, according to Section 18.7, the ccNSO must appoint one non-member ccTLD to a seat on the IANA Function Review Team (IFRT). Requirements such as this one have been difficult to meet as the number of non-member ccTLDs decreases.*" – This is an issue for the ccTLD community (and currently we are working to change it) but it is not correct to say that this requirement is "outdated", because it was introduced in 2016.

Response/Action: We have removed "outdated" from the sentence.

21. Structure and operations section: "*…– issues for which the guidance was unclear or nonexistent in existing policies RFC 1591, ICP-1, and GAC Principles 2000 and 2005.*" – Please note: ICP-1 and GAC Principles 2000 and 2005 have never been recognized as policies, and should not be referred to as policies.

Response/Action: Thank you, noted and changed. We admit there was a misunderstanding and mischaracterization of the term "Policy Statement," which is how the FOI WG referred to RFC 1591, ICP-1, and GAC Principles 2000 and 2005.

22. Structure and operations section: "*The ccNSO is currently comprised of 12 active Working Groups and Committees*" – Suggested change: "Currently, there are 12 active ccNSO Working Groups and Committees".

Response/Action: Thank you, noted and changed.

23. Structure and operations section: "*A few respondents critiqued the lack of transparency in appointing Working Group members…*" – ALL volunteers to ccNSO Working Groups and Committees are approved. Therefore it is difficult to see any issues with "transparency".

Response/Action: We made edits to this language based on additional fact-finding interviews at ICANN64 in Kobe; during those interviews, we were informed that in some rare cases there are limits to the total number of membership positions, in which cases, not all volunteers are approved.

24. Structure and operations section: "*… If more candidates apply than needed, Councillors compile a ranking of their top five candidates.* " – This is not a general rule, if a rule at all. It only applies if the number of seats is limited. In general there is no limitation to number of members on ccNSO WGs or Committees, but on Bylaw-related Review teams, committees or CCWGs. Further, the number of top candidates Councillor need to select varies, and depends on the number of seats for ccNSO appointed members.

Response/Action: This information was included based on information drawn from the Guideline on ccNSO Working Groups (in Annex B specifically), which explains the candidate ranking process that was raised by a few respondents. If we need to make any additional edits to this section for accuracy, please advise.

25. Structure and operations section: "*Although the ranking process should be based on the Selection Criteria identified in the Guideline on ccNSO Working Groups…*" – incorrect. ccNSO WGs do not have Selection Criteria.

Response/Action: [Page 11 of the Guideline on ccNSO Working Groups](#) notes the selection criteria that should be considered in selecting candidates. We recognize that, in practice according to respondents interviewed, no other information besides a candidate's name is typically needed to apply.

26. Structure and operations section: "*… a few of the ccNSO Councillors interviewed explained that those criteria are vague and not all Working Groups require any information beyond a nominee's name.*" – As explained above, for ccNSO WGs that's all that is needed.

Response/Action: We have updated the language to reflect that WG membership is largely open except in cases where a WG Charter indicates a limited number of seats in which case there is a selection process. We would welcome any additional suggested clarifying edits.

27. Structure and operations section: "*…which is led by the Council Chair and Vice Chair*" – not entirely correct. The Council may decide how many Vice-chairs are needed. Currently, we have two.

Response/Action: Thank you, noted and changed.

28. Structure and operations section: "*…consists of:*
    • *Three Councillors appointed by the ICANN Nominating Committee…*" – Suggest that you start with 15 ccTLD appointed Councillors, not with 3 NomCom appointees.

Response/Action: Thank you, noted and changed.

29. Structure and operations section: "*the Senior Director for ccNSO Policy Development Support"* - This is job title is incorrect. This should be Vice-President Policy Support – ccNSO relations

Response/Action: Thank you, noted and changed. We had used the title listed on the [ICANN website.](#)

30. Structure and operations section (ICANN Meetings): "*…notably on Constituency Day…*" – this concept does not make sense in the context of the ccNSO.

Response/Action: We apologize for being unclear in the text and we have changed this sentence. We were summarizing comments made by respondents that they appreciated the opportunities for the ccNSO to meet during ICANN meetings, and most of those opportunities formally occur on Constituency Day as that is time dedicated on the ICANN schedule for SO/ACs to meet amongst themselves (rather than in cross-community settings, for example).

31. Structure and operations section:. "*The ccNSO currently funds up to 12 people per meeting, of which eight are Councillors*" – to be precise, it is ICANN that gives funding to the ccNSO to fund travelers. Currently, the correct number is 17, not 12.

Response/Action: Thank you, noted. We included this information based on the most updated document we have found, the [Revised Travel Funding Guideline](#) (adopted April 2016) states that ICANN gives funding to 12 individuals, of which 8 must be Councillors.

32. Structure and operations section: "*Time is another key resource that members must dedicate to the ccNSO. The organization is reliant upon people volunteering their time and expertise to fulfill its functions, but members struggle to find sufficient time to participate in the ccNSO. Multiple members shared the view that an unfair burden is placed on smaller ccTLD operators because they do not have large teams to distribute staff coverage at ccNSO / ICANN assignments, calls, and meetings. For many members, taking time away from one's regular obligations and responsibilities in order to participate in the ccNSO is not easy and may not even be appropriate. As one interviewee put it, ccTLD managers "should be serving the local [Internet] community; attending ICANN meetings should come as a lesser priority." Another interviewee shared that, in the early days of the ccNSO, ccTLD operators considered it in their interest to participate, but over the years that attention has dwindled and along with it, their participation. ccNSO participants may also face turnover among their superiors: a new supervisor(s) may not support continued engagement in the ccNSO from a time or financial perspective.*" – This is a critical point and these two elements should be weighed. This is also one of the main issues for participation in WGs. If enough time, travel funding may be necessary, but they are equal. One would have expected a question on how relevant ccNSO/ICANN is for ccTLDs, i.e. how much time can one spend on ICANN/ccNSO related matters.

   Response/Action: Thank you for this comment.

33. Structure and operations section: "*Yet, without the engaged and consistent participation of members, the operations of the ccNSO become less efficient*" – efficiency is the least concern here. Legitimacy and accountability is a significantly bigger issue.

Response/Action: Thank you for this opinion. Given this was a finding from interview data, we do not see a clear need to change this unless the RWP would like to offer additional guidance.

34. Structure and operations section: "*As a result, there are occasions when ccNSO participants are asked to participate outside of regular business hours including at times in the middle of the night, which understandably hinders one's ability to participate*" – but it allows others, from other time zones, to participate. Including this comment disregards people from other time zones and, therefore, does not make sense. It is also a missed opportunity to check to what extend participation in the ccNSO is dependent on business hours and/or considered part of a job at the registry.

Response/Action: Thank you. We realized that the use of "one's" was perhaps being interpreted in the singular so we have changed it to "people's ability". On the second point, this may be something we could explore in engaging the community in potential solutions to these findings to help uncover real or perceived barriers to participation. The extent to which participation in the ccNSO is dependent upon business hours or job description did not come up clearly in the findings.

35. Structure and operations section: "…*technical experts and do not consider themselves newcomers, described their discomfort and/or disinterest working on the policy-side of the ccNSO*" – Isn't it normal? Lawyers have issues to understand technical things, techies struggle with policy, marketing people do not get law, etc. What is the purpose of this observation?

Response/Action: Indeed it is normal to have these challenges in diverse multi-stakeholder communities and within technical and/or policy venues that they are engaged. The purpose of including this is to acknowledge that it is a finding that arose from the review data.

36. Structure and operations section: Figure 16 [onboarding] does not make sense unless it is clear how long respondents have been around. We developed materials and started active on-boarding 3 or 4 years ago. Are newcomers still unhappy or here we have data from those who joined before on-boarding activities?

Response/Action: When analyzing the survey data, we found that 9 out of 10 respondents who have been involved in the ccNSO for 3 to 5 years (and thus became involved during the time period you mention) were "Satisfied" or "Very satisfied" with the onboarding opportunities offered to new ccNSO participants. This is a higher proportion than we observed amongst members that have been involved for a shorter or longer time. We have included this finding in the report.

As members of the RWP suggested during a call to review the findings, we analyzed other survey questions by demographic characteristics as well. Due to small sample sizes in each category (e.g., the number of respondents from Africa that answered "Satisfied" to a question is very small, as is the number of respondents from Europe that answered "Satisfied" to the same question), we did not feel comfortable making comparisons or drawing quantitative conclusions of this kind.

37. Structure and operations section: "*ccNSO Councillors do not receive much training and orientation on Council roles, responsibilities, and procedures*." – that is not correct. Councillors used to receive an email with detailed information. Now they are invited to on-boarding sessions (telephone conference or face-to-face).

Response/Action: Thank you, we note that the use of "much" is subjective and we have updated this language to be more objective and based upon the respondents' views. Note this was a finding from the interviews.

38. Accountability section: "…*some particularly praising the ccNSO's new openness to non-members*" – factually incorrect. The ccNSO has always been open to non-members.

Response/Action: Thank you. Respondents seemed to perceive a change in the degree the ccNSO's welcoming of non-members, but this may be more of a cultural shift regarding perceptions of inclusivity than a technical change in the level of openness.

39. Accountability section: *"Many respondents observed that Councillors frequently miss Council meetings, which at times can delay votes that require a higher quorum"* – higher quorum requirement is a rare thing.

Response/Action: Thank you, we have noted this.

40. Accountability section: *"Not all [Councillors] participate actively in Working Groups or other activities"* – Councillors are not required to participate in WGs – it is not why they are Councillors. This is a very unfair comment.

Response/Action: We have added language to note this is not a requirement. This was a finding from the interview data which perhaps reflects an expectation that Councillors participate in WGs or other activities.

41. Accountability section: The final sub-section is confused and appears to be mixing ccTLD operational "best" practice and ccTLD behaviour in the ccNSO. These two are completely different and should not be mixed together.

Response/Action: Thank you, we have clarified the language to distinguish between ccTLD best practices and ccTLD behavior in the ccNSO.

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