

The ASO Address Council's Response to ICANN's "Review Procedure to Handle Policy Proposals Submitted by the ASO Address Council in Line with the ASO MoU"

The ASO Address Council thanks ICANN for revising and posting for comments the proposed procedure that will be followed for review of global Internet number resource policy proposals submitted by the AC. We would like to offer our comments to the procedural steps posted on 31 May 2005¹. This document was drafted by AC Member Louis Lee in conjunction with AC Member Sebastian Bellagamba, and discussed by the Address Council prior to submission to ICANN on 21 June 2005.

The AC recognizes that ICANN has thoroughly evaluated the previously submitted comments, and has incorporated the suggestions where deemed appropriate and possible. We fully appreciate that the tone of the review procedure has shifted from one that conveys a strong finality to one that presents these steps as part of the overall policy proposal procedure within the ASO MoU.

Our first suggestion for refinement is for the title. We note that the change from "ASO Policy" in the original title to "Policy Proposals Submitted by the ASO Address Council" removes any implication that the ASO Address Council itself developed the policy being reviewed. While this significant improvement continues to maintain that the ASO is the Supporting Organization who is forwarding the proposal, it does nothing to inform the reader that the scope of the policy is global Internet number resource. The scope may not be recognized unless the reader already understands the role of the ASO. We would like to suggest that the text "Global Internet Number Resource" be inserted before the word "Policy" in the title to provide the scope as well as to increase consistency with the ASO MoU. A minor suggestion would be to replace "in Line with" with "in Accordance with" for a little added formality.

Proposed review procedure step 4:

*The proposal shall be **posted for public comments** within 5 business days, **with comments due within 21 days from posting**. All ICANN Supporting Organizations and Advisory Committees shall be immediately notified of the posting and their comments invited as appropriate.*

While the Address Council's position is that the public comment period is redundant and may unnecessarily delay acceptance of the proposed policy by the ICANN Board, we recognize and understand that the comment period is a requirement within Section 6 of Article III in the ICANN bylaws².

Proposed review procedure step 5:

*During all the steps 1-4 above, **ICANN staff so assigned, may ask the ASO Address Council for clarifications of the proposal, as appropriate.** Such questions for clarifications shall be reasonable, concise and bundled. The ASO Address Council shall respond to such questions within 10 business days.*

To avoid restricting formal requests for clarification to only the ICANN staff, the AC suggests that the text be simplified to "...ICANN may ask the ASO Address Council for clarifications of the proposal."

In closing, the Address Council again thanks ICANN for the significant updates made to the initially proposed review procedure and for requesting additional comments from the community on the new revision. We hope that the Board will incorporate these new suggestions so that we may fully support the adoption of the review procedure in fulfillment of ICANN's agreement in Section 5 of the ASO MoU.

¹ The *Review Procedure to Handle Policy Proposals Submitted by the ASO Address Council in Line with the ASO MoU* is available online:

<http://www.icann.org/announcements/announcement-31may05.htm>

² The ICANN bylaws are available online. The following URL links directly to Article III, Section 6: <http://www.icann.org/general/archive-bylaws/bylaws-08apr05.htm#III-6>