

The ALAC recognises and understands why this consultation is occurring now, but we do note that it is, to some extent, unfortunate timing with regard to redelegations.

ccTLD: The ccNSO Working Group on the review of the Framework of Interpretation (FOI-WG) aims to establish a community agreed consensus of the understanding of terms, meanings, usage, limitations and the intentions of RFC 1591, ICP-1 and the relevant GAC Advice (2000 and 2005) relating to the rare relatively occurrence of the ccTLD redelegation (see [FOI-WG - http://ccnso.icann.org/workinggroups/foiwg.htm](http://ccnso.icann.org/workinggroups/foiwg.htm)). The WG has not completed its work, but it will report to the ccNSO Council and as stated in its Charter "... advise whether it should launch a Policy Development Process to recommend changes to the current policies for delegation, re-delegation and retirement of country code Top Level Domains ...".

gTLD: Redelegations are virtually unknown at the moment. With the advent of the New gTLDs program, they may well become far more common, but it is not at all clear how this new process will play out.

1. What are the key performance standards that would be meaningful for delivering the ccTLD/gTLD Delegation and Redelegation service?

Timing and accuracy are reasonable standards.

To be meaningful, they must be fully documented and publicly available to the extent allowed by legal or confidentiality constraints.

For ccTLD redelegations, which can at times be tortuous processes and often include "false starts", end-to-end timing may not be sufficient. There may need to be measures not only of the overall end-to-end time, but the time from the initiation of the "successful" redelegation request, with a particular focus on the effectiveness, efficiency as well as accountability and transparency of the involvement of the 'Local Internet Community' and 'Significantly Interested Parties'.

Once the work of the FOI-WG and any recommended ccNSO PDP process has been completed, there may be a need to redefine the performance standards.

2. What do you consider KPIs for successful performance of the ccTLD/gTLD Delegation and Redelegation service?

With one exception, the KPIs identified in the Consultation documents are reasonable. The exception is for ccTLD redelegations. ccTLD/gTLD delegations, and gTLD delegations are, or are expected to be, reasonably standardized processes. ccTLD redelegations particularly contested redelegations, are rare occurrences and often "one-of-a-kind" and the reporting may need to

be tailored particularly to reflect the more convoluted process. Moreover, the possibly necessary elongated ccTLD processes should to the extent possible, not skew the overall reporting.

For any process that will not be concluded within one reporting cycle (presumably not longer than one month), processes that are in progress should be displayed to allow all stakeholders and interested parties to be able to follow the progress.

For accuracy, the rate should not only be reported, but for cases where the transaction was not 100% accurate initially, information on the time-to-discover the error and the time-to-recover should be made available.

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

Some sort of a dashboard should be used to present the overall statistics, with the ability to drill down to specific delegations and redelegations. Moreover the underlying data should be readily exportable.

Stakeholders should be able to subscribe to alerts to keep them informed of delegation and redelegations requests and the ensuing milestones throughout the following process.

As the rate of new gTLD delegations ramp up, statistics on these should updated regularly, probably weekly, to ensure that the community is well aware of the details of the namespace expansion and most particularly, any problems experienced in the ramp-up and steady-state period, where root changes are expected to occur at an unprecedented rate.

4. Do you have additional input on suitable performance standards for the ccTLD/gTLD Delegation and Redelegation service?

No Comment.