Discussion Draft 22 October 2021

TITLE: Modifying gTLD Consensus Policies

Executive Summary

This paper provides an overview of the applicable processes for modifying or amending Consensus Policies, including the roles and responsibilities of the GNSO Council, the ICANN Board, ICANN org, and the Implementation Review Team (IRT) throughout these processes. The functions of the GNSO Council, ICANN Board, ICANN org, and the IRT are established in the ICANN Bylaws, the GNSO Policy Development Process (PDP) Manual, The IRT Principles and Guidelines, and the Consensus Policy Implementation Framework (CPIF). These functions are described in section 1 below. While the paper focuses primarily on the implementation phase and the customary practices and requirements that are available to modify or amend an existing Consensus Policy, portions of this paper reference the policy development process as documented in the Bylaws.¹ Ultimately, the policy development and the implementation processes work together to create and bring into effect a Consensus Policy that is binding on contracted parties and establish rules that ICANN org must implement.

This paper also illustrates in section 2 the different practices available for modification or amendment of policies at different stages of the policy development and implementation lifecycle. This includes several scenarios and examples of when a Consensus Policy has been modified and the process taken for such a modification.

As the policy work of the ICANN multistakeholder model continues to expand and become intertwined, some issues have emerged during the implementation of new policy recommendations. Thus, this review of applicable procedures to modify policies has been helpful in identifying gaps that might benefit from further clarification or discussion, relating to how to modify an existing Consensus Policy depending on the circumstance of the policy

While this paper focuses primarily on Consensus Policies, the additional outputs of the GNSO Council generally follow similar steps when it comes to modification or amendments, for example see the <u>Transfer Policy</u> and <u>Conflict of Interest Policy</u>.

¹ It's important to distinguish the possible outcomes of a policy development process (PDP) and relevant to note that each outcome may also be modified using similar methods within the multistakeholder model, as described below. For the purpose of this paper the following terms and definitions are used:

A Consensus Policy is an ICANN policy that is binding on contracted parties (gTLD registries and registrars) through their contractual obligations. An example of a Consensus Policy is the Transfer Policy.

Policy is an ICANN policy that is not contractually binding but defines how ICANN operates as an organization. An example of a policy is the Conflicts of Interest Policy.

GNSO Procedures or General Practices are established practices developed through GNSO
processes that are used by ICANN org and the community. An example of a procedure is
WHOIS Conflicts with Privacy Law (WHOIS procedure).

change. These gaps are further described in section 3 of this paper, to provide an opportunity for community discussions on identifying the source of gaps and confirming where they exist.

The ICANN organization has developed this paper as a thought exercise to share with the community for information and input on existing processes.

Section 1: Roles and Responsibilities during Policy Development and Implementation

The following paragraphs focus on the roles and responsibilities of ICANN org, the GNSO Council, and the IRT during the policy development and implementation lifecycle, as described in the GNSO PDP Manual, the Bylaws, and the CPIF.

A. The GNSO Council

Article 11 of the Bylaws specifies that the GNSO is the policy making body that is "responsible for developing and recommending to the Board substantive policies relating to the generic-top-level domains." Developing these recommendations typically occurs via the Policy Development Process detailed in Annex A of the ICANN Bylaws.

It is the responsibility of the GNSO Council to manage the GNSO PDP, which it does using the GNSO Operating Procedures. These procedures include a Policy Development Process Manual (PDP Manual), which contains guidance, definitions, and processes supplementing the GNSO PDP itself.

The role of the GNSO Council changes during the transition from policy development to policy implementation, where the GNSO Council PDP Manual specifically characterizes the role of the GNSO Council during the implementation phase as the authorizing body that will "direct the creation of the Implementation Review Team (IRT) to assist staff in developing the implementation details for the policy." Per Annex A section 10 of the Bylaws, the GNSO Council may, but is not required to, direct the creation of an implementation review team to assist in implementation of the policy.³ As part of the IRT recruitment process, the GNSO Council may also appoint a GNSO Council liaison to assist in communications and coordination with the Council on the work of ICANN org and the IRT during the implementation process. ⁴

The GNSO Council also remains available to ICANN org and the IRT if further additional guidance is needed to ensure the policy implementation remains consistent with the intent of the policy recommendations.⁵

² Article 11 (ICANN Bylaws)

³ See Annex A, Section 10 (ICANN Bylaws)

⁴ See page 9 of the GNSO PDP Manual

⁵ See section B, of CPIF Roles and Responsibilities

B. The ICANN Board

Once the GNSO Council has approved a set of PDP recommendations, the staff manager transmits them, accompanied by an approved Recommendations Report, to the Board (see Annex A, Section 9 of the Bylaws). Once the Board acknowledges receipt of the PDP Recommendations Report and if applicable, GAC advice regarding any public policy concern⁶ and any other relevant advice and inputs from Advisory Committees, along with public comment proceedings, which are mandatory for transparency under Article 3, section 3.6 of the Bylaws⁷ and, if applicable, an Operational Design Phase (ODP)⁸ have all concluded, the Board will consider whether to adopt the recommendations. As stated in the Bylaws, "[a]ny PDP Recommendations approved by a GNSO Supermajority Vote shall be adopted by the Board unless, by a vote of more than two-thirds (2/3) of the Board, the Board determines that such policy is not in the best interests of the ICANN community or ICANN."

In cases where the Board believes the GNSO policy recommendations, based on their complexity and/or potential operational impact, warrant a request for additional information before considering them, the Board will initiate an ODP. A Board request for an ODP directs ICANN org to perform an operational analysis on specific GNSO policy recommendations. Once completed, the ICANN org will submit the Operational Design Assessment (ODA), the expected output of the ODP to the Board for its consideration.

If the Board adopts the policy recommendations, it will "give authorization or direction to ICANN staff to work with the GNSO Council to create an implementation plan based upon the implementation recommendations identified in the Final Report, and to implement the policy."

C. The Implementation Review Team

As described in the GNSO Council PDP Manual, the IRT is convened to "assist staff in developing the implementation details for the policy" to ensure that the implementation conforms with the intent of the policy recommendations. ¹⁰ The IRT is not a forum for opening or revisiting policy discussions, and any policy questions that arise are to be handled by the GNSO Council.

Additionally, "in the event of disagreement between ICANN Staff and the IRT or any of its members on the implementation approach proposed by ICANN Staff, the GDD Project manager, in consultation with the GNSO Council Liaison shall exercise all reasonable efforts to resolve the disagreement. Should the disagreement prove irreconcilable despite such efforts, the GNSO council liaison in consultation with the IRT is expected to make an assessment as to the level of consensus within the IRT on whether to raise the issue with the GNSO council for

⁶ See Article 3 Section 3.6 iii (ICANN Bylaws)

⁷ See Article 3 Section 3.6 i & ii (ICANN Bylaws)

⁸ For more information, please see the Operational Design Phase webpage

⁹ Section 10, Annex A (ICANN Bylaws).

¹⁰ See page 9 of the GNSO PDP Manual

consideration. If the GNSO Council liaison makes the determination that there is consensus for such consideration, the liaison will inform the GNSO Council accordingly which will deliberate on the issue and then make a determination on how to proceed".¹¹

This process also applies to cases in which there is agreement between the IRT and ICANN org concerning the need for further guidance from the GNSO Council and/or when new issues arise that may require policy discussion.

D. ICANN org

ICANN org supports and engages with the work of the community throughout the policy development and the policy implementation processes. During a PDP, this includes supporting the relevant processes, providing data to inform the deliberations, and engaging and supporting community participation.

If GNSO policy recommendations are adopted, the Board directs the authorized designee, usually the ICANN CEO, to implement the now Board-adopted policy recommendations. This procedure results in a transition from policy development work to policy implementation work. While the community is responsible for developing policy, ICANN org is accountable for policy implementation and ensuring that the implementation outcome aligns with the policy's stated intent and purpose. The steps ICANN org takes to implement the Board-adopted GNSO policy recommendations are described in the Consensus Policy Implementation Framework (CPIF).

Section III.B of the CPIF details that ICANN org is "responsible for implementing community's recommendations at the direction of the Board and under the supervision of the CEO." This consists of managing the "entire implementation lifecycle from creating an implementation plan, engaging the Implementation Review Team (IRT) (if there is one), consulting with relevant ICANN org staff and any outside parties that are required, and conducting outreach surrounding the implementation, including communicating with the public and relevant stakeholders regarding the progress of implementation."¹²

Section 2: Processes for Modifying Consensus Policies

This section describes existing processes to address cases where policies are amended or modified at various stages in the policy development and implementation lifecycle.

2.1 Modifying policy recommendations before Board approval

The GNSO PDP manual acknowledges a type of policy modification procedure, where "approved GNSO Council policies may be modified or amended by the GNSO Council at any

¹¹ See Section V.E of the IRT Principles and Guidelines

¹² See section B, of <u>CPIF Roles and Responsibilities</u>

time prior to the final approval of the ICANN Board." 13 This type of modification would consist of the GNSO identifying issues or modifications, reconvening the PDP team for consultation, followed by an additional public comment period for community consultation prior to GNSO Council consideration of the amended or modified policy recommendations - which requires a Supermajority vote of the Council for approval. 14 It is important to note that the GNSO's ability to modify policy recommendations via this process can be exercised only where those recommendations have not yet been adopted by the Board and not afterwards.

For example, in 2017 the GNSO Council reconvened the original IGO-INGO Protections in All gTLDs PDP Working Group, to consider possible modifications to its original Consensus Policy recommendations concerning the Red Cross National Society names that the GNSO Council approved in November 2013. The reconvened working group delivered its Final Report to the GNSO Council in June 2018. The modified recommendations were unanimously approved by the Council in September 2018 and the ICANN Board adopted the modified recommendations in January 2019. ICANN org implemented the modified Consensus Policy which took effect in August 2020.¹⁵ For this scenario, no gaps in documented procedures for making modifications have been identified.

Modifying policy recommendations between Board approval and policy effective 2.2 date

The current process documentation does not appear to address a case where a policy needs to be amended during the course of implementation, for example, when additional guidance is provided by the Board or GNSO Council regarding the interpretation of a policy recommendation.

Depending on the nature of the circumstances, the GNSO Council may address such a case using several different approaches such as initiating a GGP (which can be initiated by the GNSO when a request for input relating to gTLDs has been received from the ICANN Board or a gTLD issue has been identified by the GNSO Council that would benefit from GNSO Guidance)¹⁶ a PDP/EPDP, or other guidance to the IRT and/or ICANN staff.¹⁷

¹³ See section 16, page 10 of the <u>GNSO PDP Manual.</u>

¹⁴ Ibid.

¹⁵See here for more information about the history of the IGO-INGO Protections in All gTLDs PDP Working Group and the amendment process. Additionally, see here to view the final modified Consensus Policy. ¹⁶ See GGP Manual: Note that the manual states that a GGP would be initiated only if the gTLD issue would not result in a new Consensus policy. A proposed GNSO Guidance Recommendations Report will be published for public comment, and if approved by the GNSO Council, Draft Recommendation(s) Report will be sent to the Board for consideration.

¹⁷ See page 4, section V.E of the IRT Principles and Guidelines. Note that the IRT Guidelines document the implementation process through the lens of the IRT and GNSO Council. Additionally, see https://www.icann.org/en/system/files/files/irt-principles-guidelines-23aug16-en.pdf This may include initiating a GNSO Input Process (GIP), GNSO Guidance Process (GGP) or Expedited Policy Development Process (EPDP) as appropriate to the issue at hand. Details on these processes can be found at https://gnso.icann.org/en/council/procedures

This could occur via a GNSO Guidance Process (GGP) that has been initiated to review and provide guidance on an issue.

Available mechanisms for modifying policy recommendations also include a PDP or EPDP. For this mechanism the EPDP can be used in the case where, for example, a policy issue is identified during the implementation of policy recommendations, or where the impact on an existing policy is unclear. It's important to note that an EPDP may not only be used for situations where policy concerns arise during implementation and can be initiated under several other specific circumstances.¹⁸

The CPIF also indicates that modifying existing policies can be accomplished during the policy implementation process if the GNSO Council initiates "a new PDP on the issue," as per the GNSO PDP Manual.

All of the procedures discussed require ICANN org staff and the IRT to work transparently with the community to implement the necessary changes based on the guidance provided. As provided for in the CPIF, the org works with the IRT and the GNSO Council Liaison to raise any policy issues to the GNSO Council. It should be noted that identifying policy concerns that arise during the implementation phase can be relatively subjective, indicating a need for established and documented guidelines.

2.3: Modifying implemented Consensus Policies

A. Direct policy changes

Section 16 of the GNSO PDP Manual specifies that "approved GNSO Council policies that have already been adopted by the ICANN Board and have been implemented by ICANN Staff may only be amended by the initiation of a new PDP on the particular issue." The most straightforward procedure available to modify an existing Consensus Policy is through the initiation of a PDP or EPDP to review or consider changes to that policy. This is termed, for purposes of this paper, a **direct policy change**.

The GNSO Council may initiate a PDP through a Board request, a GNSO Council request, or an Advisory Committee request.¹⁹

An EPDP may be initiated by the GNSO Council and is another available mechanism by which the GNSO is able to develop or revise a gTLD policy. An EPDP can be initiated only:

¹⁸ See the EPDP manual for more information

¹⁹ To learn more about the process and requirements to initiate a PDP see Section 3, Annex A (ICANN Bylaws)

- to address a narrowly defined policy issue that was identified and scoped after either the adoption of a GNSO policy recommendation by the Board or the implementation of such an adopted recommendation; or
- to create new or additional recommendations for a specific policy issue that had been substantially scoped previously such that extensive, pertinent background information already exists, e.g. (a) in an Issue Report for a possible PDP that was not initiated; (b) as part of a previous PDP that was not completed; or (c) through other projects such as a GGP.

In either case, the work of a PDP or EPDP team is defined by its charter, including the purpose and deliverables of the relevant process. Where a PDP/EPDP is chartered to review and consider updates to a given policy, any recommended changes resulting from this process would be considered a direct policy change.²⁰

An example of an existing policy that has been modified is the Inter-Registrar Transfer Policy which was originally implemented in 2004. In 2008, the GNSO Council adopted a <u>PDP</u> recommendation for changes to the text of the policy on "Clarification of Reasons for Denial," which were approved by the Board and implemented by ICANN org.

In order to review and consider changes to various elements of the existing policy, the GNSO Council initiated a series of PDPs (numbered IRTP-A to IRTP-D) to address areas of the Transfer policy that required improvements. Each working group developed a final report and policy recommendations which were adopted by the GNSO Council and the Board. Following Board adoption an IRT was initiated to amend and supersede the previous Transfer Policy to implement the approved policy recommendations.²¹

B. Indirect policy changes

For purposes of this paper an **indirect policy change** occurs when a set of policy recommendations indirectly impact and require changes to one or more existing Consensus Policies (i.e., where the PDP was NOT initiated to focus on those particular Consensus Policies). The process of addressing indirectly impacted existing Consensus Policies is not clearly defined in the Bylaws or operational procedures such as the CPIF and GNSO PDP Manual; therefore, this section illustrates procedures typically taken to address indirect policy changes.

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²⁰ It's important to note that the Bylaws do not specifically provide guidance on policy modifications. Instead, the Bylaws anticipated the existence of an operational manual thus <u>Section 2, Annex A</u> instructs the GNSO Council to develop a Policy Development Process Manual ("PDP Manual") that will be maintained by the GNSO Council within the Council operating procedures. Specifically, the PDP Manual shall contain specific additional guidance on completion of all elements of a PDP, including those elements that are not otherwise defined in these Bylaws.

²¹ Ibid.

The CPIF, the framework that illustrates the life of the policy implementation process after the Board has adopted GNSO policy recommendations, briefly identifies the possibility that an existing Consensus Policy may be modified during policy implementation; noting that "when a PDP requires changes to an existing Consensus Policy or the creation of the new Consensus Policy, ICANN org will create a draft Consensus Policy language proposal to begin implementation discussions." The CPIF identifies the possibility that existing policies may be modified during implementation, yet it doesn't clarify what steps should be taken if implementing a new Consensus Policy indirectly impacts existing policies. Part of planning for policy implementation is to understand whether the Board-adopted PDP recommendations' outcome is to create a new Consensus Policy and whether the impact of the Board-adopted PDP recommendations requires the amendment of existing Consensus Policies. The framework assumes there is a possibility that policy recommendations may require modification of other existing policies. The expected changes may be explicitly defined in the policy recommendations, or it may only be determined once implementation begins that updates to existing policies are needed to implement the new policy recommendations fully.

As discussed above, policy modifications can be more complex in nature where multiple policies are impacted. There are also instances when PDP recommendations that are intended to create new, or modify an existing Consensus Policy, also indirectly impact other existing Consensus Policies. As noted above, a set of policy recommendations may or may not explicitly define expected changes to other policies.

For example, the recommendations developed in Phase 1 of the Expedited Policy Development Process on the Temporary Specification (EPDP Phase 1) included some explicit recommendations for changes to other policies, e.g., Recommendation 23 provided that "the following requirements MUST apply in relation to URS and UDRP until such time as these are superseded by recommendations from the RPMs PDP WG and/or policies from the EPDP regarding disclosure…"

The EPDP Phase 1 also included a general recommendation for updates to other policies and procedures, in the form of Recommendation 27: "The EPDP Team recommends that as part of the implementation of these policy recommendations, updates are made to the following existing policies / procedures, and any others that may have been omitted, to ensure consistency with these policy recommendations...."

Recommendation 27 did not specify how such updates were to be made; however, in practice, this recommendation has been implemented in the form of an inventory of policy/procedure impacts by ICANN org, review by the IRT, and triage by the GNSO Council as to the proper venue for updates, according to, for example, substantive vs. administrative updates. ICANN org and the IRT consulted with the GNSO Council per the procedures identified in the CPIF and received guidance from the GNSO Council on how to address Recommendation 27 in August 2020 noting that "in the course of making updates to impacted consensus policies, the EPDP-

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²² See page 6 of the <u>Consensus Policy Implementation Framework.</u> Note that the CPIF describes the policy implementation process from the lens of ICANN org.

Phase 1 IRT is instructed to promptly advise the GNSO Council if possible policy changes are required."²³ Moreover, there is a possibility that some of these changes may raise questions about the intent of the existing policy, which could trigger a PDP/EPDP or other process to modify or provide guidance on the policy. ICANN org and the IRT continue to transparently work together to identify if any policy changes are required.

Section 3: Future considerations for modifying existing Consensus Policies

The review of available procedures to modify a policy, conducted in this paper, has identified some gaps. As described above, further clarification would benefit the multistakeholder process as to when a Consensus Policy requires an amendment or modification and how this takes place. This section highlights some of the possible gaps and identifies some future considerations for how these might be addressed.

These considerations are of particular relevance during implementation of new policy recommendations, where there is a need to:

- a) update policy recommendations based on issues identified in the course of implementation, or
- b) change an existing Consensus Policy if the GNSO and Board approve new policy recommendations which suggest or require changes to the existing policy.

If an issue arises during implementation where a PDP recommendation impacts an existing policy, there is insufficient direction on how such changes should be made. Additionally, the CPIF notes that if an issue arises during implementation, the IRT and ICANN org staff will work with the GNSO Council liaison to receive guidance from the GNSO Council. It is also important to note that identified policy concerns are raised to the GNSO Council at the discretion of the GNSO Council Liaison or IRT member(s). The CPIF does not provide alternative mechanisms for resolving policy or implementation issues if they are not raised by the IRT members or GNSO Council Liaison, or if a liaison is not appointed.

Policy questions that arise during the implementation phase can be relatively subjective, making it crucial to develop clear guidelines that explicitly describe what steps are to be taken in such situations and how such concerns are addressed if they impact or modify an existing policy.

Depending on the case, the guidance provided may come from a GNSO Guidance Process (GGP), or PDP procedure such as the PDP or EPDP. While applying this guidance to implementation is undertaken by the org with the relevant IRT, the structure and procedure for drafting and reviewing updates made as a result of such guidance is not currently specified.

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²³ See GNSO Council <u>20 August 2020 meeting minutes.</u>

Supporting additional clarity as to when a policy development effort may result in a change to existing Consensus Policies can also be helpful. For example, there is no guidance as to whether a PDP charter should expressly indicate that an existing policy must or may be modified. The Board can request an Issue Report and initiate a PDP specifically to modify an existing policy without the required GNSO vote, where the Bylaws state that "If the Board requested an Issue Report, the Council, within the timeframe set forth in the PDP Manual, shall initiate a PDP. No vote is required for such action."²⁴ But the lack of explicit guidance on modifying policies still exists and exemplifies that a PDP may result in the need to alter an existing consensus policy without specific chartering. This gap would benefit from further clarification for accountability and transparency purposes.

As the body of policy work continues to grow, and policy areas become increasingly interrelated (e.g., numerous policies considering registration data), it is important to establish clear and transparent procedures and guidelines for modification of Consensus Policies. Some possible considerations, as initial suggestions for areas of discussion, are noted in the table below.

The examples noted in this paper illustrate that an opportunity exists for community discussion to incorporate clarifying directions in the relevant processes. For example, as a result of the work of a joint GAC-GNSO Consultation Group in 2016, a "Quick Look Mechanism" was added to the GNSO's PDP Manual²⁵ whereby the GAC is notified of a request for an Issue Report preceding the PDP, to enable the GAC to determine whether the issue in question has potential public policy implications. A similar approach might be utilized to discuss actions to address the possible gaps identified in this paper.

	Stage	Possible Gaps	Possible Actions
1	During Policy Development Process	PDP charter may not expressly indicate whether impacts of the work on other existing policies should be considered.	 Add to charter template a general or specific provision/question regarding consideration of impact on existing consensus policies

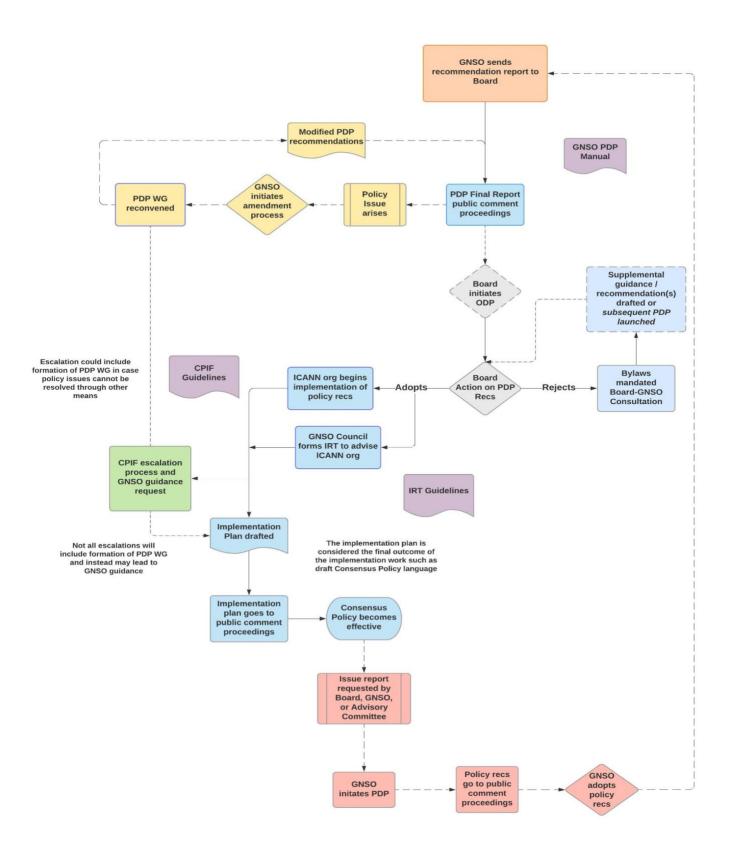
²⁵ See section 5 of the GNSO PDP Manual https://gnso.icann.org/sites/default/files/file/field-file-attach/annex-2-pdp-manual-24oct19-en.pdf

²⁴ See Annex A, Section 3 & 5 of Bylaws (ICANN)

	Stage	Possible Gaps	Possible Actions
2		Lack of information regarding implementation impacts on other existing policies	 Enable a process during the PDP to share relevant information and analysis on potential impacts to existing policies, to support consideration by PDP working groups Define this process as part of GDS liaison role
3		Impact on existing policies may not be clearly identified in Final Report and/or not considered by GNSO Council in making recommendations to Board	 Include in the Final Report template a section to address any direct or indirect implications for existing policies, to support full consideration by the PDP working group and the GNSO Council. This may include implementation guidance where appropriate.
4	During Board consideration	Impact on existing policies may not be clearly identified in Recommendations Report and/or not clear to Board in taking decision on recommendations.	 Include in the Recommendations Report template a section to address any direct or indirect implications for existing policies, to support full consideration by the Board. The work of the Operational Design Phase, if undertaken, may also identify impacts on existing policies, for consideration by the Board. Define or formalize steps for Board to seek clarifications where needed.
5	During implementation	The CPIF identifies the possibility that existing policies may be modified during implementation, yet it doesn't clarify what steps should be taken if implementing a new Consensus Policy indirectly impacts existing policies	 Update CPIF to note that as part of implementing a new policy, ICANN org and the IRT review updates to other policies and incorporate as part of the implementation plan. Document steps to be taken if GNSO does a PDP/EPDP, or GGP to update recommendations or provide guidance during the course of implementation Create a structure for version control and archival history of policies that have been modified. Account for the need to review updates to other policies as part of implementing a new policy, in the recruitment and work expectations of IRTs.

	Stage	Possible Gaps	Possible Actions
6		The CPIF does not provide alternative mechanisms for resolving policy or implementation issues if they are not raised by the IRT members or GNSO Council Liaison, leaving a possible gap for handling disagreements on how / what to change in existing policies during implementation.	 Further document procedures or guidelines that provide the necessary clarifications that address scenarios if a policy issue arises during implementation that is not escalated to the GNSO Council at the discretion of the GNSO Liaison or IRT (e.g., impasse process).

Annex A: Amending Existing Policies Flow



Annex B: Links to Process Documents Referenced

- Bylaws, Annex A (GNSO PDP steps from scoping to Board approval): https://www.icann.org/resources/pages/bylaws-2019-12-03-en#annexA
- Bylaws, Annex A-1 (GNSO EPDP): https://www.icann.org/resources/pages/governance/bylaws-en/#annexA1
- Bylaws, Annex A-2 (GNSO GGP): https://www.icann.org/resources/pages/governance/bylaws-en/#annexA2
- **GNSO Working Group Guidelines** (including participation norms, role of the Chair and consensus designations): https://gnso.icann.org/sites/default/files/file/field-file-attach/annex-1-gnso-wg-guidelines-24oct19-en.pdf
- GNSO Guidance Process Manual (including participation norms, initiation procedures, and process outcomes): https://gnso.icann.org/sites/default/files/file/field-file-attach/annex-5-ggp-manual-30jan18-en.pdf
- GNSO Operating Procedures Documents (includes a list of operational manuals, guidelines and templates) https://gnso.icann.org/en/council/procedures
- **CPIF** (as of 2019): https://www.icann.org/uploads/ckeditor/CPIF_v2.0_2019CLEAN.pdf
- IRT Principles & Guidelines (in Annex L):
 https://gnso.icann.org/sites/default/files/filefield_47797/pi-wg-final-recommendations-01jun15-en.pdf