

Comments to Identifier Technology Health Indicators: Definition
Comments of the Noncommercial Stakeholders Group

Unfortunately this initiative is fundamentally flawed and distracting from actual and substantive work at ICANN. This comment period ranks as a complete abuse of the time of volunteers in the ICANN Community who have to stop their lives, and take time away from more substantive issues and PDPs to respond to them. The comments below strongly support the cries of John Berryhill, IAB Chair Andrew Sullivan and James Gannon in setting forth that sometimes a comment topic does not deserve consideration and should be eliminated at the start. This said, let us share that:

- SSAC wants metric of the DNS and that is certainly supportable;
- BUT assigning silly, strange and distorted names to issues that need *careful and balanced* review, consideration and evaluation is, as you have been told in other comments, DANGEROUS:
 1. It's prejudicial – assigning a disease name to a certain situation implies it is a problem. For example, DATAMALGIA (Pain from Bad Data) delves into difficulties we have been exploring for over 15 years: of privacy and data protection protections and laws not currently allowed to be implemented by Registrars, of legitimate exercises of Free Expression by individuals and organizations operating in opposition to oppressive regimes and governments who would jail them for their views (or worse); of students who have no phones, but do have computers, Internet connections and ideas that to share via domain names. This data is not a disease, but a complex policy discussion and concern.
 2. It's unfair – superimposing a disease name atop an area of serious research, study and evaluation minimizes the problems, discourages the robustness of the debate, and makes it more difficult to fully evaluate and resolve the issues.
 3. It's unwise – labeling a serious research area with a silly name. It diminishes the work of many years and the good faith efforts of numerous task forces, working groups and committees.

The answer here is simple. We are technologists, lawyers, registration industry members and other Community members who have become policy makers. We look at facts, situations, data and evidence. It destroy and diminishes our efforts, time and discussions to label them with silly names.

Overall, this is a poorly presented comment – you have asked us (Commenters) to delve into a slide presentation for the materials that are the basis of your question. The 5 disease names that have been created impose prejudicial interpretations on debates within the scope of ICANN, and ask us to go far beyond the boundaries of ICANN. The answer is “no.”

Respectfully submitted,

NonCommercial Stakeholders Group

