To: Altanovo Domains Limited

Date: 4 October 2023

Re: Request No. 20230904-1

This is in response to your request for documentary information (Request), which was submitted on 4 September 2023 through the Internet Corporation for Assigned Names and Numbers' (ICANN) Documentary Information Disclosure Policy (DIDP). For reference, the Request is attached to the email forwarding this Response.

Items Requested

Your Request seeks the disclosure of the following documentary information relating to the ICANN Independent Review Process Standing Panel.

- 1. All documents reflecting or relating to all [Independent Review process Community] ICRG meetings, including meeting transcripts and meeting minutes.
- 2. All documents reflecting or relating to communications between or involving ICRG members regarding their work on nominating a slate of Standing Panel members.
- 3. All documents reflecting or relating to the ICRG's efforts to select the Standing Panel, including:
 - a. the list of candidates who responded to ICANN's "Call for Expressions of Interest: Standing Panel for ICANN's Independent Review Process" (collectively, the Candidates);
 - b. the matrix scoring of the Candidates used by the ICRG;
 - c. the factors ICANN identified as "relevant in assessing a panelist's application" and the weight given to each factor;
 - d. the selection process for the Standing Panel, including the "process/criteria for 'winnowing' candidates;" and
 - e. any quality testing on the Candidates performed by the ICRG.
- 4. All documents reflecting or relating to the ICRG's interviews with the Candidates for the Standing Panel, including:
 - a. the interview protocol;
 - b. names of the participants in each interview;

- c. questions posed to the Candidates by the ICRG and the Candidates' individual answers to those questions;
- d. the evaluation method for each interview; and
- e. any notes taken by ICANN Staff, ICANN Legal, and/or ICRG members on the Candidates' interviews.
- 5. All documents reflecting or relating to the ICRG's
 - a. selection of their external consultant, Odgers Berndtson;
 - b. work with the external consultant regarding the Candidates and their selection for the Standing Panel; and
 - c. coordination with the external consultant to "vet[] and identify[] a slate of qualified panelists."
- 6. All documents reflecting or relating to communications, actions, consultations, or deliberations with the International Centre for Dispute Resolution (ICDR) regarding the Standing Panel.
- 7. All documents reflecting or relating to the ICRG's work with any other consultant(s) regarding the selection of the Standing Panel.
- 8. All documents reflecting or relating to the "[i]nitial candidate assessments" of ICRG members that attended candidate interviews.
- 9. All documents reflecting or relating to "ICANN [Org's] view on unqualified candidates.
- 10. All documents reflecting or relating to the nominees forwarded to the ICANN Board by the ICRG, including:
 - a. The number of nominees;
 - b. The names of the nominees;
 - c. The nominees' qualifications;
 - d. The Expressions of Interest (EOI) submitted by each nominee to ICANN, and any documents accompanying their EOI; and
 - e. how the ICRG selected the list nominees from the Candidates, including the ICRG's "Candidate Scoring table."
- 11. All documents reflecting or relating to the ICANN Board's consideration of the ICRG's nominees for the Standing Panel.

- 12. All documents reflecting or relating to the Terms of Engagement for Standing Panel members and/or contracts that will be entered into between ICANN and members of the Standing Panel.
- 13. All documents reflecting or relating to communications, actions, or deliberations on the remuneration and/or compensation given to members of the Standing Panel by ICANN.
- 14. All documents reflecting or relating to communications, actions, or deliberations relating to
 - a. the staggering of the Standing Panel members' five-year terms;
 - b. the "future [Standing Panel] slate recommendation processes"; and
 - c. the "appropriate times to initiate the slate recommendation process."
- 15. All documents reflecting or relating to the "training provided by ICANN [to members of the Standing Panel] on the workings and management of the Internet's unique identifiers and other appropriate training," including documents reflecting the ICRG and ICANN's deliberations on what constitutes "other appropriate training." Please also provide details on who has conducted or will conduct the trainings.
- 16. All documents reflecting or relating to the Standing Panel's compliance with "the conflicts-of-interest policy stated in the ICDR operating rules and procedures as well as additional conflict of interest considerations developed for the IRP."
- 17. All documents reflecting or relating to actions or deliberations by (a) the ICANN Board or (b) ICANN Staff addressing Verisign's involvement in Mr. David McAuley's work on the ICRG.
- 18. All documents reflecting, containing, or relating to any communications about the constitution of the ICRG, including documents related to the selection of Mr. McAuley as a member of the group, comments made by Mr. McAuley and otherwise concerning his participation in the Standing Panel selection and empanelment criteria and procedures.
- 19. All documents reflecting, containing, or relating to any communications about the nomination or appointment of the Chair of the ICRG.

Response

The DIDP is a mechanism, developed through community consultation, to ensure that information contained in documents concerning ICANN's operational activities, and

within ICANN org's possession, custody, or control, that are not already publicly available is made available to the public unless there is a compelling reason for confidentiality. (See <u>https://www.icann.org/resources/pages/didp-2012-02-25-en</u>.)

As part of its commitment to transparency, ICANN makes available a comprehensive set of materials on its website as a matter of course, including, but not limited to, information relevant to community-related work

(<u>https://community.icann.org/dashboard.action</u>), including the IRP-IOT (<u>https://community.icann.org/display/IRPIOTI</u>) and the establishment of the IRP Standing Panel (<u>https://community.icann.org/display/ESPFIRP</u>), financial information (<u>https://www.icann.org/en/about/financials</u>), Board meeting agenda, transcripts, resolutions, and minutes (<u>https://www.icann.org/en/board-activities-and-meetings</u>), accountability mechanisms documents

(https://www.icann.org/resources/pages/accountability/reconsideration-en and https://www.icann.org/resources/pages/accountability/irp-en), litigation documents (https://www.icann.org/resources/pages/governance/litigation-en), correspondence (https://www.icann.org/resources/pages/correspondence), blogs (https://www.icann.org/en/blogs), and announcements (https://www.icann.org/en/announcements).

This Response was prepared in accordance with the Process for Responding to ICANN's DIDP Requests. (See

https://www.icann.org/en/system/files/files/didpresponse-process-21jan23-en.pdf). As discussed in further detail below, except for Item No. 6, your Request seeks the disclosure of information related to the establishment of the IRP Standing Panel. As a preliminary matter, much of the IRP Standing Panel selection process is confidential to safeguard both the integrity of the process and the personal data of the candidates. ICANN has published all non-confidential responsive documentary information in its custody, possession, or control on its website regarding the establishment of the IRP Standing Panel. ICANN is not required under the DIDP to provide documentary information in response to requests if such responsive documents are already publicly available.

Background on the ICANN IRP Standing Panel

The IRP is an accountability mechanism set forth under <u>Article 4</u>, <u>Section 4.3 of the</u> <u>ICANN Bylaws</u> for third-party review of ICANN Board or Staff actions (or inactions) alleged by a claimant to be inconsistent with ICANN's Articles of Incorporation or Bylaws. The Bylaws provide that an omnibus Standing Panel shall be established from which a three-member IRP panel shall be selected to preside over specific IRP disputes. The Bylaws also define processes for when an IRP panel must be convened in the event that a Standing Panel is not yet in place. (<u>ICANN Bylaws, Art. 4</u>, <u>Section</u> <u>4.3(k)(ii)</u>.) The Bylaws further specify that an IRP Standing Panel shall consist of at least seven members, "each of whom shall possess significant relevant legal expertise in one or more of the following areas: international law, corporate governance, judicial systems, alternative dispute resolution and/or arbitration. Each member of the Standing Panel shall also have knowledge, developed over time, regarding the [Domain Name System] DNS and ICANN's Mission, work, policies, practices, and procedures." (ICANN Bylaws, Art. 4, Section 4.3(j)(i).)

The Bylaws outline a four-step process for establishing the IRP Standing Panel. Section 4.3(j)(ii) states:

(A) ICANN, in consultation with the Supporting Organizations and Advisory Committees, shall initiate a tender process for an organization to provide administrative support for the IRP Provider..., beginning by consulting the "IRP Implementation Oversight Team"...on a draft tender document.

(B) ICANN shall issue a call for expressions of interest from potential panelists, and work with the Supporting Organizations and Advisory Committees and the Board to identify and solicit applications from well-qualified candidates, and to conduct an initial review and vetting of applications.

(C) The Supporting Organizations and Advisory Committees shall nominate a slate of proposed panel members from the well-qualified candidates identified per the process set forth in <u>Section 4.3(j)(ii)(B)</u>.

(D) Final selection shall be subject to Board confirmation, which shall not be unreasonably withheld.

(*Id.* at Art. 4, Section 4.3(j)(ii).) ICANN began implementing the four-step process at the start of 2017, following its incorporation into the Bylaws effective 1 October 2016.¹ Among other things, ICANN mapped out the empanelment process outlined in Section 4.3(j)(ii), drafted a call for expressions of interest (EOI) for standing panelists, consulted with the IRP Implementation Oversight Team (IRP-IOT) on the process document and draft call for EOI, and provided regular updates to the IRP-IOT on the status of the process. ICANN also consulted with the Supporting Organization (SO) and Advisory Committee (AC) leadership concerning their roles in the empanelment process, including how the SOs and ACs intended to carry out their work to identify, vet, and collectively nominate a slate of well-qualified panelists for consideration by the ICANN Board. (See IRP-IOT Meetings, <u>9 February 2017</u>, <u>6 April 2017</u>, <u>27 April 2017</u>, <u>11 May 2017</u>, <u>27 July 2017</u>, <u>17 August 2017</u>, <u>7 September 2017</u>, <u>14 November 2017</u>, and <u>7</u>

¹ Through consultation with the IOT, it was determined that the first step in the four-step process, is not applicable, as it involves a tender process for an organization to provide administrative support to the IRP Provider. However, the IRP Provider currently in place already has its own administrative support. (See IRP-IOT Meeting, <u>27 July 2017</u>. *See also*, <u>https://www.icann.org/en/system/files/files/establishment-irp-standing-panel-process-roadmap-19jan18-en.pdf;</u> https://community.icann.org/display/ESPFIRP/2018+Meetings.) December 2018. See also, IRP-IOT Draft Letter to SOs and ACs, January 2017, https://community.icann.org/download/attachments/63149880/IRP%20IoT%20draft%20I etter%20to%20SOs%20and%20ACs%5B2%5D.pdf?version=1&modificationDate=1484 317298000&api=v2; Draft Call For EOI for IRP-IOT Consideration, 29 March 2017, https://community.icann.org/download/attachments/59643726/EOI-Standing-Panel-DRAFT%20for%20IOT%20Consideration%5B4%5D.pdf?version=1&modificationDate= 1490906300000&api=v2; and Draft Process Roadmap re Establishment of IRP Standing Panel, 27 July 2017,

https://community.icann.org/pages/viewpage.action?pageId=66087375&preview=/66087375/69273804/Process%20Roadmap%20re%20Establishment%20of%20IRP-v3.pdf.)

On 31 March 2020, ICANN org published a call for EOI for interested panelists to serve on the IRP Standing Panel. (See

https://www.icann.org/en/announcements/details/icann-extends-call-for-expressions-ofinterest-standing-panel-for-icanns-independent-review-process-23-7-2020-en.)

Following lengthy discussions, in October 2020, the SOs and ACs opted to conduct their work on establishing the Standing Panel through a group of representatives called the IRP Community Representatives Group (CRG). (See Terms of Reference for IRP CRG (ToR), 5 October 2020,

https://community.icann.org/display/ESPFIRP/Relevant+Documents?preview=/9509546 9/151848025/Community-Representatives-Group-Terms-of-Reference%20-

<u>%2012%20October%202020.pdf</u>.) As stated in the CRG's ToR, "[t]he purpose of the [group] is to work with ICANN org to evaluate, vet, and recommend a slate of candidates as a standing group to perform the work set forth in Section 2.2. [of the ToR]." (ToR,

https://community.icann.org/display/ESPFIRP/Relevant+Documents?preview=/9509546 9/192223027/IRP-Community-Rep-Group-ToR%20(v.11Feb2022).pdf.) A call for EOI to serve on the CRG was published on 18 November 2020. (See https://www.icann.org/en/announcements/details/call-for-expressions-of-interestcommunity-representatives-group-to-select-independent-review-process-standingpanel-18-11-2020-en.) Subsequently, the SOs and ACs selected seven members to serve on the CRG. (See https://www.icann.org/en/announcements/details/icanncommunity-representatives-chosen-to-nominate-the-irp-omnibus-standing-panel-slate-17-2-2022-en.)

The CRG met from March 2022 through March 2023. On 27 October 2022, the CRG published an update on the Standing Panel composition process, detailing the work undertaken thus far and outlining the next steps in the empanelment process. (*See* <u>https://www.icann.org/en/blogs/details/update-on-the-icann-independent-review-process-standing-panel-composition-27-10-2022-en</u>.) In March 2023, the CRG recommended a slate for the IRP Standing Panel to the ICANN Board. (*See* <u>https://www.icann.org/en/board-activities-and-meetings/materials/minutes-meeting-of-the-board-accountability-mechanisms-committee-bamc-20-04-2023-en.) The nomination is undergoing evaluation by Board Accountability Mechanisms Committee. (*See id.*)</u>

Your Requests

The 19 document requests, with its multiple subparts, as stated in full above, are overlapping in subject matter and seek many of the same documents. As such, they will be addressed together under their respective categories below.

• Item Nos. 1-5, 7, 8, 10, 11

These items seek the disclosure of documents related to the selection of the Standing Panel. Specifically, Item Nos. 1-8 and 10 seek documents relating to the work of the CRG in evaluating, vetting, and recommending a slate of panelists to the ICANN Board for consideration. Item No. 11 asks for documents related to the Board's consideration of the CRG's nominated slate of panelists. As explained above, ICANN makes available a comprehensive set of materials on its website as a matter of course, which includes information responsive to these items. While ICANN is not required under the DIDP to respond to requests seeking documentary information that is already publicly available, ICANN notes that materials responsive to these items can be found at the following webpages: IRP Standing Panel Establishment webpage, blogs, announcements, and Board materials webpage. ICANN notes that as it relates to Item No. 7, aside from Odgers Berndtson, the CRG did not work with any other consultants. Therefore, ICANN org is not in possession, custody or control of any documents responsive to this item because no such documents exist.

As noted above, a significant portion of the IRP Standing Panel selection process is confidential to safeguard both the integrity of the process and the personal data of the candidates. Therefore, to the extent that there are additional documents responsive to these items, such as emails, meeting transcripts, notes, information about Standing Panel candidates, such documents are subject to the following DIDP Conditions for Nondisclosure (Nondisclosure Conditions) and are not appropriate for disclosure:

- Internal information that, if disclosed, would or would be likely to compromise the integrity of ICANN's deliberative and decision-making process by inhibiting the candid exchange of ideas and communications, including internal documents, memoranda, and other similar communications to or from ICANN.
- Information exchanged, prepared for, or derived from the deliberative and decision-making process between ICANN, its constituents, and/or other entities with which ICANN cooperates that, if disclosed, would or would be likely to compromise the integrity of the deliberative and decision-making process between and among ICANN, its constituents, and/or other entities with which ICANN cooperates by inhibiting the candid exchange of ideas and communications.
- Personnel, medical, contractual, remuneration, and similar records relating to an individual's personal information, when the disclosure of such information would or likely would constitute an invasion of personal privacy, as well as proceedings of internal appeal mechanisms and investigations.

- Information subject to the attorney–client, attorney work product privilege, or any other applicable privilege, or disclosure of which might prejudice any internal, governmental, or legal investigation.
- Drafts of all correspondence, reports, documents, agreements, contracts, emails, or any other forms of communication that, if disclosed, could be harmful to an ongoing deliberative or decision-making process, or are subject to another Condition for Non-Disclosure.
- Materials, including but not limited to, trade secrets, commercial and financial information, confidential business information, and internal policies and procedures, the disclosure of which could materially harm ICANN's financial or business interests or the commercial interests of its stakeholders who have those interests. Where the disclosure of documentary information depends upon prior approval from a third party, ICANN will contact the third party to determine whether they would consent to the disclosure in accordance with the DIDP Response Process.
- <u>Item No. 6</u>

This item seeks documents "reflecting or relating to communications, actions, consultations, or deliberations with the International Centre for Dispute Resolution (ICDR) regarding the Standing Panel." This request is overbroad in scope and time, and does not attempt to limit the information sought in any meaningful way. To the extent that this item is intended to seek documents relating to communications, actions, consultations or deliberations between the CRG and the ICDR regarding the Standing Panel, the CRG did not engage with the ICDR in its work. Therefore, ICANN org is not in possession, custody, or control of any documents responsive to this item because no such documents exist. Insofar as this item seeks materials relating to communications, actions, actions, consultations, or deliberations between ICANN staff and the ICDR regarding the Standing the Standing Panel, the responsive documents have been published on the IRP-IOT webpage.

To the extent that there are additional documents responsive to this item, such as emails or notes, such documents are subject to the following Nondisclosure Conditions and are not appropriate for disclosure:

- Internal information that, if disclosed, would or would be likely to compromise the integrity of ICANN's deliberative and decision-making process by inhibiting the candid exchange of ideas and communications, including internal documents, memoranda, and other similar communications to or from ICANN.
- Information exchanged, prepared for, or derived from the deliberative and decision-making process between ICANN, its constituents, and/or other entities with which ICANN cooperates that, if disclosed, would or would be likely to compromise the integrity of the deliberative and decision-making process between and among ICANN, its constituents, and/or other entities

with which ICANN cooperates by inhibiting the candid exchange of ideas and communications.

- Information subject to the attorney–client, attorney work product privilege, or any other applicable privilege, or disclosure of which might prejudice any internal, governmental, or legal investigation.
- Drafts of all correspondence, reports, documents, agreements, contracts, emails, or any other forms of communication that, if disclosed, could be harmful to an ongoing deliberative or decision-making process, or are subject to another Condition for Non-Disclosure.
- <u>Item No. 9</u>

This item asks for documents "reflecting or relating to "ICANN [Org's] view on unqualified candidates." As detailed above, Section 4.3(j)(i) of the Bylaws identifies the expertise and skillsets that Standing Panelists must have. The <u>Expressions of Interest</u> document published with the <u>Call for EOI for Standing Panelists</u> further describes the required or highly preferred skills and experience for panelists.

As discussed above, a significant portion of the IRP Standing Panel selection process is confidential to safeguard both the integrity of the process and the personal data of the candidates. Therefore, to the extent that there are additional documents responsive to this item, such as emails, notes, draft documents, information about Standing Panel candidates, such documents are subject to the following Nondisclosure Conditions and are not appropriate for disclosure:

- Internal information that, if disclosed, would or would be likely to compromise the integrity of ICANN's deliberative and decision-making process by inhibiting the candid exchange of ideas and communications, including internal documents, memoranda, and other similar communications to or from ICANN.
- Information exchanged, prepared for, or derived from the deliberative and decision-making process between ICANN, its constituents, and/or other entities with which ICANN cooperates that, if disclosed, would or would be likely to compromise the integrity of the deliberative and decision-making process between and among ICANN, its constituents, and/or other entities with which ICANN cooperates by inhibiting the candid exchange of ideas and communications.
- Personnel, medical, contractual, remuneration, and similar records relating to an individual's personal information, when the disclosure of such information would or likely would constitute an invasion of personal privacy, as well as proceedings of internal appeal mechanisms and investigations.

- Information subject to the attorney–client, attorney work product privilege, or any other applicable privilege, or disclosure of which might prejudice any internal, governmental, or legal investigation.
- Drafts of all correspondence, reports, documents, agreements, contracts, emails, or any other forms of communication that, if disclosed, could be harmful to an ongoing deliberative or decision-making process, or are subject to another Condition for Non-Disclosure.
- <u>Item Nos. 12-16</u>

These items seek documents related the administration of the Standing Panel, such as Terms of Engagement (Item No. 12), remuneration structure (Item No. 13), staggering of Standing Panel members' terms (Item No. 14), timing and process of future slate recommendations (Item No. 14), training (Item No. 15), and conflicts of interest considerations (Item No. 16.) These items seek documents related to subjects that are still in development. To the extent that the documents responsive to these items exist and are appropriate for disclosure, they have been published on ICANN's website. Specifically, since 2017, the IRP-IOT has engaged in discussions regarding remuneration, staggering of terms, and additional training for the Standing Panel. The transcripts of these IRP-IOT meetings are available on the IRP-IOT webpage. ICANN anticipates that the IRP-IOT will engage in further discussions about additional training for the Standing Panel as it is within their scope of work, and that the transcripts from those discussions will be published on the IRP-IOT webpage as they become available. ICANN notes that the CRG does not have a role in the training of the Standing Panel.

As noted above, a large part of the IRP Standing Panel selection process is confidential to safeguard the integrity of the process, including documents related to the administration of the panel. As matters related to the administration of the Standing Panel are finalized, documents responsive to these items will be published on ICANN's website, unless there is a compelling reason for confidentiality. For example, the training materials available to the Standing Panel will be publicly identifiable. Moreover, ICANN notes that such training will be delivered in a manner that protects against direct interactions between the Standing Panelists and ICANN staff, in the event that the training is delivered by ICANN.

To the extent that any internal documents responsive to these items exist, such documents are subject to the following Nondisclosure Conditions and are not appropriate for disclosure.

- Internal information that, if disclosed, would or would be likely to compromise the integrity of ICANN's deliberative and decision-making process by inhibiting the candid exchange of ideas and communications, including internal documents, memoranda, and other similar communications to or from ICANN.
- Information exchanged, prepared for, or derived from the deliberative and decision-making process between ICANN, its constituents, and/or other

entities with which ICANN cooperates that, if disclosed, would or would be likely to compromise the integrity of the deliberative and decision-making process between and among ICANN, its constituents, and/or other entities with which ICANN cooperates by inhibiting the candid exchange of ideas and communications.

- Information subject to the attorney–client, attorney work product privilege, or any other applicable privilege, or disclosure of which might prejudice any internal, governmental, or legal investigation.
- Drafts of all correspondence, reports, documents, agreements, contracts, emails, or any other forms of communication that, if disclosed, could be harmful to an ongoing deliberative or decision-making process, or are subject to another Condition for Non-Disclosure.
- Item Nos. 17-19

These items seek the documents related to David McAuley's involvement in the work of the CRG. Specifically, Item No. 17 asks for documents pertaining to "actions or deliberations by (a) the ICANN Board or (b) ICANN Staff addressing Verisign's involvement in Mr. David McAuley's work on the ICRG". Neither the ICANN Board nor ICANN org have addressed Verisign's involvement in Mr. McAuley's work on the CRG as he was appointed to the group by the Country Codes Names Supporting Organization to represent their interests.

(<u>https://www.icann.org/en/announcements/details/icann-community-representatives-</u> <u>chosen-to-nominate-the-irp-omnibus-standing-panel-slate-17-2-2022-en</u>). Accordingly, Therefore, ICANN org is not in possession, custody or control of any documents responsive to this item because no such documents exist.

Item Nos. 18 and 19 request documents relating to communications about the constitution of the CRG and nomination or appointment of the CRG Chair. The documents responsive to these items that are in ICANN's possession, custody, or control, have already been published on the following webpages: <u>IRP Standing Panel</u> <u>Establishment webpage</u> and <u>announcements</u>. As it relates to the appointment of the CRG Chair, ICANN notes that the process and decision was undertaken by the CRG amongst its own membership; ICANN staff did not contribute to that process.

To the extent that there are any internal documents responsive to these items, such as emails or notes, such documents are subject to the following Nondisclosure Conditions and are not appropriate for disclosure.

• Internal information that, if disclosed, would or would be likely to compromise the integrity of ICANN's deliberative and decision-making process by inhibiting the candid exchange of ideas and communications, including internal documents, memoranda, and other similar communications to or from ICANN.

- Information exchanged, prepared for, or derived from the deliberative and decision-making process between ICANN, its constituents, and/or other entities with which ICANN cooperates that, if disclosed, would or would be likely to compromise the integrity of the deliberative and decision-making process between and among ICANN, its constituents, and/or other entities with which ICANN cooperates by inhibiting the candid exchange of ideas and communications.
- Information subject to the attorney–client, attorney work product privilege, or any other applicable privilege, or disclosure of which might prejudice any internal, governmental, or legal investigation.
- Drafts of all correspondence, reports, documents, agreements, contracts, emails, or any other forms of communication that, if disclosed, could be harmful to an ongoing deliberative or decision-making process, or are subject to another Condition for Non-Disclosure.

Public Interest in Disclosure of Information Subject to Nondisclosure Conditions

Notwithstanding the applicable Nondisclosure Conditions identified in this Response, ICANN has considered whether the public interest in disclosure of the additional documentary information subject to these conditions at this point in time outweighs the harm that may be caused by such disclosure. ICANN has determined that there are no current circumstances for which the public interest in disclosing the information outweighs the harm that may be caused by the requested disclosure.

About DIDP

ICANN's DIDP is limited to requests for documentary information already in existence within ICANN that is not publicly available. In addition, the DIDP sets forth Defined Conditions of Nondisclosure. To review a copy of the DIDP, please see https://www.icann.org/resources/pages/didp-2023-01-24-en. ICANN makes every effort to be as responsive as possible to the entirety of your Request. As part of its accountability and transparency commitments, ICANN continually strives to provide as much information to the community as is reasonable. ICANN hopes this information is helpful. If you have any further inquiries, please forward them to didp@icann.org.