Public Comment Summary Report
Proposed Internet Coordination Policy 2 (ICP-2) Version 2 Principles

Open for Submissions Date:
Tuesday, 08 October 2024

Closed for Submissions Date:
Friday, 06 December 2024 (Extended from Monday, 25 November 2024)

Summary Report Due Date:
Wednesday, 08 January 2025 (Extended from Monday, 09 December 2024)

Category: Policy

Requester: Address Supporting Organization (ASO)

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Open Proceeding Link: https://www.icann.org/en/public-comment/proceeding/proposed-internet-coordination-policy-2-icp-2-version-2-principles-08-10-2024

Outcome:
The Proposed Internet Coordination Policy 2 (ICP-2) Version 2 (v2) Principles document was posted for Public Comment from 8 October 2024 to 6 December 2024 and received 14 submissions.

The Public Comment proceeding was facilitated as a guided submission form where commenters responded to 24 questions, one for each principle in the document. For each principle, commenters expressed their level of agreement through a five-point scale (Strongly Agree, Agree, Neutral, Disagree, or Strongly Disagree). Commenters were able to elaborate on their responses with optional comments for each principle. Finally, there was a dedicated field at the end of the survey for general feedback where commenters could also provide input.

ICANN appreciates the time, dedication, and participation in this proceeding and is grateful to those who provided their timely feedback.

Section 1: What We Received Input On
On 25 October 2023, the Number Resource Organization Executive Council (NRO EC) asked the Address Supporting Organization (ASO) Address Council (AC) to establish and manage a process to propose updates to Internet Coordination Policy 2 (ICP-2) in consultation with each of the Regional Internet Registry (RIR) communities. The intent of this initiative is to provide the RIR system with greater accountability to the Internet community.

This Public Comment solicited feedback on the proposed principles for ICP-2 (v2). The NRO EC also conducted a parallel effort to solicit feedback on the proposed ICP-2 (v2) principles directly from each RIR community.

For ease of reference, the proposed principles were arranged by topic and each principle was assigned a short name. Each question in the Public Comment proceeding corresponded to a single principle in the proposed ICP-2 (v2) principles.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
African GAC Members	ICANN staff	AGAC
Asian, Australasian and Pacific Islands Regional At-Large Organization	Amrita Choudhury	APRALO
At-Large Advisory Committee Policy staff in support of the At-Large Community	ICANN staff	ALAC
Federal Ministry for Digital and Transport, German Government	Rudy Nolde	FRG
Internet Infrastructure Coalition	Christian Dawson	IIC
Internet Service Providers and Connectivity Providers Constituency	Philippe Fouquart	ISPCP
Ministry of Digital Development, Communications and Mass Media of the Russian Federation	Viacheslav Erokhin	RF
Ministry of Electronics and Information Technology, Government of India	Pradeep Verma	ROI
Registries Stakeholder Group	publiccomments@rysg.info	RySG

Individuals:

Name	Affiliation (if provided)	Initials
Abraham Selby	Pan African Youth Ambassadors for Internet Governance	AS
Athanase Bahizire	ISOC DR Congo chapter	AB
Barkha Manral		BM
Felix Opilli	AFRALO	FO
Nikesh B Simmandree		NS

Section 3: Summary of Survey Responses

ICANN received five comments from individuals and nine comments from organizations or groups. ICANN thanks all of the contributors for their valuable input and feedback.

Commenters indicated on a Likert scale for each question in the survey, with each question corresponding to a principle in the proposed ICP-2 (v2) principles document. Commenters could also provide additional text to each question. Commenters were not required to answer every question since all questions were optional.

This section contains two tables. **Table 1** displays each commenter's response to each question on the Likert scale. Numeric values were assigned to each possible Likert scale response, as can be seen in the key beneath it. **Table 2** displays which commenters provided optional text feedback on which questions.

Name	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Q18	Q19	Q20	Q21	Q22	Q23	Q24
AB	4	5	5	5	5	5	5	4	5	5	5	5	3	5	5	5	5	5	5	5	5	5	5	5
AGAC	4	5	5	5	5	5	5	4	2	4	5	5	5	4	5	5	5	5	5	5	5	5	5	5
ALAC	5	4	5	5	5	5	4	5	5	5	5	5	5	4	5	5	5	5	5	5	5	5	4	4
APRALO	5	4	5	5	5		4	5	5	5	5	5	5	4	5	5	5	5		5	5	5	4	4
AS	5	4	5	5	4	4	5	4	4	4	4	5	5	4	5	5	5	4	4	4	3	4	4	4
BM	4	4	4	4	4	4	4		4	4	3	3	4	4	3	3	3	3	4	4	4	4	4	3
FRG	4	4	5	5	5	4	5	4	4	4	5	5	4	4	5	4	5	5	5	4	5	4	5	5
FO	5	5	5	5	4	5	5	4	5	5	5	5	4	5	5	5	5	5	4	5	5	5	5	4
IIC	4	5	4	5	5	5	5	4	4	4	4	5	5	4	5	5	5	4	5	5	5	5	5	4
ISPCP	4	5	4	5	5	5	5	5	4	4	5	5	5	4	5	5	5	4	5	5	5	5	5	4
NS	5	4	5	5	4	4	5	4	4	4	4	5	5	4	5	5	4	4	4	4	4	4	4	4
RF	4	4	4	4	4	4	4	4	4	4	5	5	4	4	4	2	5	4	4	4	4	4	4	4
ROI	2	2	3	3	2	2	3	2	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
RySG	5	5	5	4	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	5
Mean	4.29	4.29	4.57	4.64	4.43	4.38	4.57	4.15	4.14	4.29	4.50	4.71	4.36	4.14	4.64	4.43	4.71	4.36	4.54	4.43	4.50	4.50	4.36	4.14
Median	4	4	5	5	5	5	5	4	4	4	5	5	5	4	5	5	5	5	5	5	5	5	4	4
Std Dev	0.83	0.83	0.65	0.63	0.85	0.87	0.65	0.80	0.86	0.61	0.76	0.73	0.74	0.53	0.74	1.02	0.73	0.74	0.66	0.65	0.76	0.65	0.63	0.66

Table 1: Likert Scale Responses to Questionnaire

Key		
Likert Scale	**Number**	**Color**
Strongly Agree	5	
Agree	4	
Neutral	3	
Disagree	2	
Strongly Disagree	1	
No Response	-	

Name	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Q18	Q19	Q20	Q21	Q22	Q23	Q24	Other
AB	✓		✓		✓			✓														✓	✓		✓
AGAC	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
ALAC	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
APRALO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
AS	✓	✓		✓	✓	✓	✓	✓										✓		✓			✓		✓
BM								✓																	
FRG		✓						✓						✓						✓	✓		✓		✓
FO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIC	✓								✓			✓	✓			✓						✓	✓		✓
ISPCP	✓		✓		✓	✓			✓	✓			✓	✓		✓		✓	✓			✓	✓		✓
NS																									✓
RF																✓									✓
ROI	✓	✓		✓	✓			✓																	✓
RySG	✓	✓		✓	✓	✓		✓	✓	✓	✓							✓	✓		✓		✓		✓
Totals	10	8	6	6	9	8	5	10	7	6	3	3	4	6	5	7	4	6	6	6	6	6	8	8	13

Table 2: Optional Text Comments Provided

Section 4: Analysis of Freeform Text Submissions

The responses show an overall positive sentiment among respondents. The mean and median response for every question exceeded the neutral threshold of 3, indicating a clear tendency towards agreement with each of the proposed principles.

The highest levels of agreement were for Q12 (Not-for-profit) and Q17 (Transparency). Other high-scoring principles (mean greater than 4.5, median = 5) include Q4 (Coverage), Q15 (Community-Driven), Q3 (Rectification), Q7 (Operation), and Q19 (Service).

While a subset of the principles received a single negative response (Disagree or Strongly Disagree), these instances do not detract from the overall positive trend. These principles include Q1 (Authority), Q2 (Amendment), Q5 (Service Region), Q6 (Recognition), Q8 (Derecognition), Q9 (Community Support), and Q16 (Neutrality). All of the principles have a mean response score above 4 (Agree), and a median response of 4 (Agree) or 5 (Strongly Agree).

All comments have been thoroughly reviewed and a per-question summary of comments is provided below. Where comments could not be easily summarized they are quoted verbatim either with quotation marks or as an indented blockquote.

1) Do you agree with the Authority principle as set forth in the Proposed ICP-2 (v2) Principles document?

AB and RySG commented that the final text of the ICP-2 version 2 document should clarify the term ICANN as to whether it refers to the ICANN organization, the ICANN Board, or the ICANN community.

AGAC commented that any decision to recognize a Candidate RIR or to derecognize an RIR should not be taken without consulting with GAC members of the relevant region.

AB, ALAC, and APRALO commented that proposals for recognizing or derecognizing RIRs must come from a majority vote by the RIRs or NRO EC, with ICANN having final authority. Both stressed the importance of ICANN considering input from all RIRs via a clear process.

AS commented that to strengthen accountability it may be beneficial to include a formal mechanism for documenting and publishing the consultation process and outcomes with each RIR.

IIC and ISPCP commented that the voting threshold is not clear in the principle and needs to be described in more detail.

ROI provided the following comment:
> Fairness Consideration: Granting decision-making power solely to the existing RIRs and the NRO EC may raise concerns about impartiality, as existing RIRs might have an interest in limiting new entrants. We recommend considering the involvement of ICANN community through PDP for determination of competent authority and development of evaluation process of Candidate RIR initiated by the ASO Council keeping in view the multi-stakeholder model of internet governance supported by ICANN and an independent body within ICANN to evaluate new RIR proposals as per the evaluation process developed by the ICANN community which would help foster transparency and balance.
>
> Accountability: There is no mention of oversight to ensure the NRO EC's decisions are subject to review. Introducing a clear accountability framework would help bolster trust in the process.

2) Do you agree with the Amendment principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC commented that changes should be adopted through an open consultation process with well-defined criteria, allowing the participation of the entire community.

ALAC and APRALO supported the flexibility to amend ICP-2 through mutual agreement between ICANN and all RIRs. They commented that ICANN or any of the RIRs should be able to submit a written proposal for amendment. There should be a Public Comment period with a minimum of 40 days and approval will be determined by majority vote. This mechanism would ensure that changes to ICP-2, including amendments, are only made with the input and consent of all RIRs, preventing a single RIR from obstructing the broader agreement unless the problem is so severe that it impacts the ability to reach a consensus or participate in discussions.

AS commented that it would be helpful to specify the criteria for determining a "reasonable" grace period, ensuring that this flexibility is balanced with timely compliance.

FRG commented that more clarification on voting procedures and agreement would be welcome.

ROI commented that consultation is more important than agreement because this approach ensures that all RIRs are involved in discussions, while preventing any single RIR or group of RIRs from having a veto over essential changes to the policy.

RySG commented that the final text of the ICP-2 version 2 document should clarify the term ICANN as to whether it refers to the ICANN organization, the ICANN Board, or the ICANN community.

3) Do you agree with the Rectification principle as set forth in the Proposed ICP-2 (v2) Principles document?

AB commented that ICP-2 version 2 will be more about supporting the continuation of the RIR processes and the importance for them to stay compliant with their obligation, rather than promptly introducing the derecognition process.

AGAC commented that this provision ensures a smooth and fair transition for RIRs, provides a reasonable grace period for compliance, supports stability in Internet governance, and enhances predictability and transparency of expectations.

ALAC and APRALO commented that providing a reasonable grace period for RIRs to align with amendments to ICP-2 is crucial for ensuring a smooth transition.

ISPCP asked whether a scenario could exist where a "practice" within an RIR could trigger a change in ICP-2 version 2.

4) Do you agree with the Coverage principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC, ALAC, and APRALO commented that it is important for the RIRs to work together to maintain continuity of operations and global coverage.

AGAC commented that it is important to establish escrow services, preferably in the same region as the relevant RIR, to handle any RIR service interruptions.

AS suggested incorporating language that emphasizes the need for proactive measures by RIRs to address underserved and emerging regions to prevent any service gaps.

RySG suggests that when drafting the updated version of the ICP-2 document, the authors consider how this principle will apply during a potential transition between RIRs so as to avoid unnecessary operational disruption to RIR operations.

5) Do you agree with the Service Region principle as set forth in the Proposed ICP-2 (v2) Principles document?

AB commented that for this principle to be effective, it will be essential to have a clear definition of the coverage area and also to clearly specify the provisions in case of resource usage overlap between RIRs.

AGAC commented that this principle promotes clear and well-defined boundaries for each RIR's responsibility, ensuring that the management of IP address resources is organized and efficient across large multinational regions.

ALAC and APRALO supported this principle, but commented that it needs to be more clearly defined with respect to non-overlapping geographic areas of RIRs. Additionally, if areas are identified where overlaps exist a clear process for consultation should be established to avoid confusion for the communities within the region.

AS commented that it would be useful to establish a periodic review mechanism to assess whether adjustments in service region boundaries are necessary.

ISPCP commented that the definition of "large" should be larger than a single country. There should also be consensus on the regional boundaries within a region.

ROI commented that more clarity is needed because the principle does not account for the fact that the existing five RIRs already cover most of the world, which makes it difficult for new RIRs to avoid serving areas already managed by existing RIRs. The remainder of their detailed comment is quoted verbatim below.

> Overlap Concerns: Given that the majority of continents are already served by existing RIRs, the proposed language renders creation of new RIRs as redundant as creation of a new RIR will result in overlap with atleast one RIR. Therefore, there should be clear guidelines on how new RIRs can be established in regions already covered by these RIRs.
>
> Defining Region: A broader definition of region should be reflected in the ICP-2 principles to encompass large multinational nations that serve communities with large internet population, shared languages, cultural heritage, historical ties, and socio-economic connections. This approach recognizes regions not only by geographic proximity but also by large internet population, common linguistic, cultural, and social characteristics that bind communities across national and regional boundaries.
>
> Fairness: To ensure fairness, the principle should allow flexibility for new RIRs to operate in regions already covered, especially if they can offer more localized or specialized services.
>
> Accountability: There should be transparency in how regions are defined and assigned to new RIRs, and the process should involve external review to prevent existing RIRs from monopolizing certain areas.

RySG commented that, as written, this principle does not indicate the resolution mechanism if there is confusion and/or dispute regarding the service region of RIRs.

6) Do you agree with the Recognition principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC, ALAC, APRALO, AS, and FO commented that they agree with the principle.

AS commented that a public audit or review process for candidate RIRs would be beneficial.

ISPCP suggested the wording, "to be *considered for* recognition as an RIR", rather than "to be recognized as an RIR".

ROI commented that evaluating candidate RIRs would benefit from increased transparency, external oversight, and the establishment of timely and clear processes.

RySG commented that the Recognition principle in combination with the Operation principle may result in the candidate RIR being out of compliance upon recognition and that care must be taken when crafting text in ICP-2 version 2 to prevent this.

7) Do you agree with the Operation principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC, ALAC, APRALO, AS, and FO supported this principle.

ALAC added that the Operation principle promotes transparency, accountability, and adherence to global standards.

AS suggested the need for more detailed guidelines on demonstrating community engagement and financial support to ensure consistent evaluation.

8) Do you agree with the Derecognition principle as set forth in the Proposed ICP-2 (v2) Principles document?

AB, AGAC, ALAC, AS, BM, FO, FRG, and ROI emphasized the importance of clear and fair processes for derecognition.

ALAC, APRALO, AS, BM, FRG commented that it is important that affected RIRs be given opportunities to remedy non-compliance before any action is taken.

AB recommended gathering a community position before proceeding with any derecognition process.

AGAC highlighted the need for escrow services to ensure the continuity of operations.

BM commented that it is important that ICANN offers support to any RIR facing compliance issues and collaborate with the affected RIR to ensure a seamless transition.

ROI commented that having independent oversight for the derecognition process would enhance fairness and objectivity and that the principle does not provide a clear process for RIR to challenge derecognition decisions.

RySG pointed out a potential conflict between the Derecognition principle and the Recognition and Operation principles, and suggested the ASO AC add clarification to this principle.

9) Do you agree with the Community Support principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC commented that "community" should include regional governments (represented by the GAC) and offline communities, in addition to resource holders.

ALAC and APRALO emphasized the importance of broad support from all resource holders, especially smaller ones.

IIC and ISPCP noted that "broad support" needs clearer assessment criteria.

RySG suggested that continued community support should be a requirement for Candidate and operational RIRs.

10) Do you agree with the Community Commitment principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC commented that the Candidate RIR must demonstrate that its community is willing to use the Candidate RIR's IP resource allocation services once recognized.

ALAC and APRALO commented that community support, including financial backing and active governance participation, is essential for the RIR's sustainability, accountability, and responsiveness. They also highlighted the importance of underrepresented groups in governance.

ISPCP asked how this can be substantiated and what metrics will be used to evaluate this.

RySG commented that this principle should apply to both Candidate and existing RIRs.

11) Do you agree with the Independence principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC commented that financial stability and independence help build trust and confidence among stakeholders.

RySG suggested that the claim of financial stability and independence should be verifiable.

12) Do you agree with the Not-for-Profit principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC commented that this principle is crucial.

RySG commented that the updated version of the ICP-2 document should qualify this principle with regards to an RIR's jurisdiction.

13) Do you agree with the Corporate Governance principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC commented that an RIR must follow corporate governance procedures consistent with best practices in its jurisdiction(s).

FO supported the Corporate Governance principle, but believed there should be a stronger focus on accountability mechanisms involving the community.

IIC and ISPCP commented that these corporate governance best practices will vary by jurisdiction, may be incompatible with each other, but will have to be met.

14) Do you agree with the Member-Controlled principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC commented that the definition between Members and Resource Holders requires greater clarification.

ALAC and APRALO commented that the term "Effective Control" is vague and open to interpretation. They recommended the following amendment: "The majority of an RIR's governing body must be elected by the RIR's Members and the governing body must maintain strategic and operational control over the RIR, ensuring its decisions align with the interests of its members and stakeholders."

IIC and ISPCP asked, if only "a majority" of an RIR's governing body must be elected by its own members, how are the rest determined and what does it mean?

15) Do you agree with the Community-Driven principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC commented that it is not clear what a community is in the context of the RIRs.

ALAC, APRALO, and FRG commented that this principle is important.

16) Do you agree with the Neutrality principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC commented that the word "predictable" should be incorporated into this principle.

ALAC and APRALO commented that this principle is important.

IIC commented that the application of policies should also be documented and publicly recorded. ISPCP agreed with IIC and added that they must also be transparent.

RF disagreed with this principle. Instead they offered the following alternative text, "An RIR must operate and apply its policies in a manner that is neutral, consistent and inclusive."

RF also commented:
> Internet governance is an open democratic process based on generally recognized principles of international law, and should not be limited by any unilateral political restrictions or commercial interests. The activities of RIRs should not be conditioned by any unilateral political sanctions and policy - making, and should not lead to discrimination on territorial, national, religious or other grounds.

17) Do you agree with the Transparency principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC, ALAC, and APRALO commented that this principle is important for transparency and accountability.

18) Do you agree with the Audit principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC, ALAC, and APRALO commented that this principle is important to ensure ongoing compliance.

ISPCP and RySG commented that the frequency of the audits should be included in the updated version of ICP-2. Additionally, the ISPCP commented that the nature, or metrics looked at as part of the audit, should also be included.

19) Do you agree with the Service principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC, ALAC, and APRALO commented that this principle is important.

ISPCP commented that the updated version of ICP-2 should state that RIR services must operate in accordance with its established policies.

RySG commented that more detail should be included in the updated version of ICP-2 regarding which standard protocols and specifications RIRs must use.

20) Do you agree with the Continuity principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC commented that escrow services are important to ensure this principle.

ALAC and APRALO commented that record-sharing practices and backups are necessary to ensure continuity of services.

AS commented that the updated version of ICP-2 should include explicit criteria for monitoring RIR ecosystem stability, including indicators that would prompt collaborative actions.

FRG commented that specifications of records necessary for record-sharing and continuity of service should be included in the updated version of ICP-2.

21) Do you agree with the Anti-Capture principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC, FRG, and RySG commented that "capture" requires a more clear definition.

ALAC, APRALO, and FRG commented that more detail on anti-capture rules and enforcement should be included in an updated version of ICP-2.

22) Do you agree with the Ecosystem Stability principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC, AB, ALAC, APRALO, and AS commented that this principle is important.

ALAC and APRALO commented that expanding on how ecosystem stability will be practically supported across RIRs, possibly through shared protocols, regular joint assessments, or resilience planning, would be helpful.

AS commented that establishing a collaborative forum for RIRs to share best practices, update protocols, and troubleshoot emerging technical issues collectively might be advantageous.

23) Do you agree with the Remedial Bias principle as set forth in the Proposed ICP-2 (v2) Principles document?

AB, AGAC, ALAC, and APRALO commented that this principle is important.

AGAC commented that regional GAC communities can play a crucial role in remediating failure.

IIC and ISPCP commented that it may be desirable for remediation to be carried out in a documented and transparent manner.

RySG commented that the meaning of this principle is unclear and that greater clarity be provided when drafting the updated ICP-2 document.

24) Do you agree with the Handoff principle as set forth in the Proposed ICP-2 (v2) Principles document?

AGAC, ALAC, and APRALO commented that this principle is important.

ALAC and APRALO commented that the additional text should be added to the principle, "In case the derecognised RIR fails to cooperate with ICANN and other RIRs to ensure smooth transfer of operations, ICANN and other RIRs are authorized to take necessary steps to facilitate smooth and safe transition of operations."

FRG commented that this principle coincides with the principle of Continuity.

IIC and ICPCP commented that they are uncertain this principle can be enforced if an RIR is being derecognized without its consent.

Please provide any other feedback you may have about the Proposed ICP-2 v2 Principles.

AB, ALAC, APRALO, AS, FRG, FO, IIC, ISPCP, NS and RySG provided generally positive feedback on the principles document.

AGAC reiterated their concern that Africa is not represented on the ASO AC while this critical review process is taking place and reemphasized the urgency for the three vacant African seats to be filled by the African community.

IIC and ISPCP commented that it was not their intention to reopen these discussions if the Address Supporting Organization (ASO) considers consensus to have been reached.

RF supported the overarching goals of the ICP-2, while also highlighting several concerns. RF disagreed with the current version of the principle of Neutrality. RF proposed rewriting the Neutrality principle as, "An RIR must operate and apply its policies in a manner that is neutral, consistent and inclusive".

Additionally, RF commented that, "Internet governance is an open democratic process based on generally recognized principles of international law, and should not be limited by any unilateral political restrictions or commercial interests. The activities of RIRs should not be conditioned by any unilateral political sanctions and policy - making, and should not lead to discrimination on territorial, national, religious or other grounds."

ROI proposed two principles be added to the document.

The first proposed principle from ROI is a compliance mechanism since the current principles provide no clear guidance on compliance mechanisms if a request for a new RIR is rejected. Their rationale is that this compliance mechanism would both ensure fairness and enhance trust in the system by ensuring that all applicants are treated equitably, and have recourse to challenge decisions that may not seem justified.

The second proposed principle from ROI is a review mechanism that proposes the ICP-2 criteria and RIR operations get reviewed every five years. Their rationale is that this would introduce a process of continuous improvement and promote transparency of the overall system.

ROI also gave two additional overall recommendations: the first is on impartial decision making, and the second is on evaluation parameters.

> Impartial Decision Making:
> The current system may appear to centralize too much power with existing RIRs and the NRO EC, which could lead to concerns about impartiality. Given that existing RIRs are also bound by a Service Level Agreement (SLA) with ICANN for the services they provide, it raises concerns about whether RIRs should evaluate new RIRs. An independent decision-making body should oversee these processes to ensure fairness and neutrality.

> Evaluation Parameters:
> Evaluation should be carried out based on diverse criteria and parameters which should specifically take into account the internet user population that the new RIR aims to cater; existence of skills and capacities to:
> - handle technical and administrative functions efficiently to meet the needs of stakeholders and build trust.
> - Initiate policy development process (PDP) to facilitate inclusive bottom up multi-stakeholder governance by engaging stakeholders in policy discussions." (ROI)

Section 5: Next Steps

The ASO AC will proceed to draft an updated ICP-2 document. The comments received in this Public Comment process will be considered by the ASO AC as they prepare the next draft of this document.