From: Silvia Vivanco
Date: Friday, September 25, 2026
To: Correspondence Board Ops Team
Cc: Hadia Elminiawi, Hervé Hounzandji, Abdeldjalil Bachar Bong, Pierre Dandjinou, Yaovi Atohoun, Russ Weinstein, Heidi Ullrich, Gisella Gruber, Alice Jansen, Karen Lentz
Subject: CORRESPONDENCE-Joint ICANN 86 AFRALO-AFRICANN Statement "ICANN Transparency and Accountability: AFRALO Comment on the Review of Reviews Work Stream and the Proposed Transition Article for Specific Reviews"

Dear Board support staff and colleagues,

On behalf of AFRALO's chair Hadia El Miniawi, kindly find attached the joint **ICANN 86 AFRALO-AFRICANN**Statement entitled **"ICANN Transparency and Accountability: AFRALO Comment on the Review of Reviews Work Stream and the Proposed Transition Article for Specific Reviews"** which was discussed at the ICANN 86 Seville meeting. AFRALO recently approved the statement for submission to the ICANN Board for information purposes.

The statement reviews 18 AFRALO statements issued between 2010 and 2026, tracing the evolution of AFRALO's positions on ICANN accountability and transparency. It highlights the shift from a focus on access and representation toward participation equity, implementation traceability, and measurable outcomes, and provides recommendations to strengthen ICANN's accountability and review framework.

Thank you!

Silvia

Silvia Vivanco
Policy Development Support, Senior Manager, (At-Large Regional Affairs)
Website: atlarge.icann.org

Joint AFRALO-AfrICANN Think Tank

ICANN 86 Seville Policy Forum

8-11 June 2026,
Seville, Spain

-=-Statement -=-

ICANN Transparency and Accountability: AFRALO Comment on the Review of Reviews Work Stream and the Proposed Transition Article for Specific Reviews

The AFRALO Think Tank Working Group reviewed eighteen AFRALO statements issued between 2010 and 2026 relating to ICANN accountability and transparency. On that basis, the group developed the present statement, highlighting key findings, trends, and lessons emerging from more than a decade of African community engagement while also providing forward-looking recommendations to strengthen future accountability and review mechanisms within ICANN. The annexes are provided for reference purposes. Annex 1 contains a detailed analysis of each statement, including key issues, AFRALO positions, outcomes and impacts, unresolved gaps, lessons learned, and forward-looking insights. Annex 2 summarizes each statement in tabular form, including the topic, core request, documented outcomes, and remaining gaps.

Across these statements, AFRALO's position evolved from concerns regarding access and participation barriers toward a broader and more sophisticated understanding of accountability focused on institutional design, participation equity, implementation traceability, and measurable outcomes. While AFRALO consistently identified structural challenges at an early stage, ICANN responses were often procedural rather than outcome-based, with limited mechanisms to demonstrate whether African concerns translated into measurable institutional outcomes.

A recurring issue throughout the reviewed statements is participation asymmetry. Despite improvements in formal accountability structures following the IANA stewardship transition, practical barriers such as resource limitations, language

constraints, connectivity challenges, policy complexity, limited institutional capacity and travel restrictions continue to constrain meaningful participation, particularly for African stakeholders.

The analysis therefore emphasizes that inclusiveness cannot be measured solely by openness of process, but also by the practical ability of stakeholders to participate effectively, contribute substantively and influence outcomes.

The review further highlights the growing complexity of ICANN's governance environment. AFRALO's more recent statements increasingly address forward-looking issues such as DNS abuse mitigation, Universal Acceptance, digital identity, artificial intelligence, Internet fragmentation, and the impact of external legal and regulatory developments on the multistakeholder model.

This reflects AFRALO's transition from advocating primarily for representation toward actively contributing to broader Internet governance, accountability, and policy discussions.

In the context of the ongoing Review of Reviews process and the proposed reform of the ICANN review system, AFRALO supports efforts to redesign a more focused, effective, and usable framework, including proposals relating to the Accountability and Transparency Review, Structural Review, and On-Demand Review mechanisms. However, AFRALO cautions that efficiency gains must not come at the expense of transparency, inclusiveness, accessibility, stakeholder trust, or traceability of outcomes.

Recommendations:

AFRALO provides the following recommendations to strengthen ICANN's accountability and review framework:

1. **Traceable Accountability Mechanisms**

   We recommend that ICANN establish a public response matrix for all major reviews and public comments, mapping each recommendation to a clear disposition (accepted, modified, deferred, or rejected), including rationale, owner and timeline.

2. **Implementation Tracking Transparency**

   ICANN should establish a public implementation dashboard to track all review recommendations, including milestones, owners, dependencies, evidence of completion and demonstrated impact.

3. **Inclusion and Accessibility Metrics**

   The revised review system should provide publicly reported KPIs on geographic diversity, stakeholder representation, gender balance, newcomer participation, and accessibility measures, including multilingual participation options.

4. **Safeguards During the Pause of Specific Reviews**

   AFRALO supports a time-bound pause of Specific Reviews, provided that safeguards are maintained including quarterly public reporting, a clearly defined restart schedule and strict limitations extension beyond the proposed timeframe.

5. **Transparent Scoping of Reviews**

   The scoping process of reviews should be fully transparent, with all proposed topics, rationales and exclusions published publicly, ensuring visibility of priorities raised by underrepresented regions.

6. **Clear Distinction of ICANN Remit**

   The review system should clearly distinguish between issues within ICANN's remit and those requiring coordination with external stakeholders, with explicit follow-up mechanisms for both categories.

7. **User Centric Accountability Evaluation**

   ICANN should incorporate mechanisms to assess how accountability measures are perceived by end users, particularly in developing regions, focusing on trust, inclusiveness and real world impact.

Conclusion:

This analysis reveals a defining thread in AFRALO's 16-year advocacy history: a consistent and evolving demand for traceable influence. While ICANN's procedural inclusivity has expanded over time, the review of these eighteen statements confirms that accountability remains incomplete when community input lacks a transparent path to disposition and implementation. For the African community, meaningful participation hinges not on the number of open calls, but on practical access to decision-making, mitigated volunteer burdens, and visible tracking of outcomes.

AFRALO supports the reform of ICANN's review system, provided that it leads to a framework that is more transparent, inclusive, measurable and accessible. The setting of clear measures and metrics for this end is pivotal. The core lesson emerging from eighteen statements is that accountability is meaningful only when community input is transparently traceable to institutional outcomes and when participation is practically achievable for all regions.

AFRALO remains committed to constructive engagement with ICANN, the Board and the broader community to ensure that accountability mechanisms strengthen trust and deliver tangible benefits for Internet users globally, particularly those from underrepresented regions such as Africa.

Annex 1

Timeline of AFRALO's evolving positions

The timeline below shows how AFRALO's focus moved from **access to application equity**, to **institutional accountability design**, to **review legitimacy, privacy/public interest, MSM effectiveness, participation equity, and measurable digital-identity outcomes**. It synthesizes the 18 statements reviewed in this report. [6]

Year	ICANN Meeting	Topic / Statement
2010	ICANN39	Support for New gTLD Applicants
2012	ICANN43	Applicant Support Program
2012	ICANN44	Low African Participation
2013	ICANN46	Development Fund / Ecosystem Readiness
2014	ICANN51	IANA Transition + Accountability
2015	ICANN52	ICANN Accountability
2015	ICANN54	Transition Coordination + Community Powers

2016	ICANN55	CCWG Final Proposal
2016	ICANN56	Implementation, PTI, Diversity
2016	ICANN57	WS2 Scope + Volunteer Load
2017	ICANN58	At-Large Review Legitimacy
2017	ICANN60	GDPR / Public Interest
2018	ICANN62	GDPR / Access Model
2019	ICANN65	MSM Effectiveness
2021	ICANN70	External Laws vs MSM
2023	ICANN77	African Participation in ICANN
2023	ICANN78	Internet Resource Governance in Africa
2025	ICANN82	African Digital Identity in Next gTLD Round

Analytical entries for the eighteen statements

Statement: Support for New gTLD Applicants / ICANN39 Cartagena, December 2010

Key Issue: AFRALO identified a structural contradiction in ICANN's new gTLD program: if the application fee remained effectively unaffordable, the first round would privilege already-capitalized actors and exclude the very developing-country, cultural, linguistic, and community applicants whom the Board had said it wanted to support.

AFRALO Position: AFRALO welcomed outreach and education but argued that outreach without fee reduction was not meaningful inclusiveness. It explicitly tied lack of cost reduction to the likely exclusion of African and disadvantaged community applicants from the first round.

Outcome/Impact: ICANN later created an Applicant Support Program, but the historical outcome validates AFRALO's warning rather than disproving it: the 2025 AFRALO statement records that only 17 of roughly 1,930 applications in the prior round came from Africa, and only a very small number were delegated to African applicants. [6]

Gaps/Unresolved Issues: ICANN did not convert "support" into a measurable equity obligation. There were no published African participation targets, no corrective thresholds, and no transparent evaluation of whether support changed outcomes in underrepresented regions. [6]

Lessons Learned: AFRALO's earliest applicant-support analysis was conceptually correct: diversity in a market program must be designed into the economics, not added afterward as optional outreach.

Forward-Looking Insight: AFRALO should treat applicant support as an accountability question tied to outcome metrics: African applications, supported applications, evaluation pass rates, delegations, and post-delegation sustainability.

Statement: ICANN African Community on the New gTLD Applicant Support Program / ICANN43 San José, March 2012

Key Issue: AFRALO argued that the ASP was weak not because assistance was absent on paper, but because it was poorly communicated, underfunded, and overly subjective in evaluating financial need. The statement also raised the need for a post-implementation review and stronger developing-country presence in evaluation.

AFRALO Position: AFRALO supported the existence of the ASP but criticized its design. It wanted objective financial-need criteria, serious regional "marketing" and outreach, stronger funding, and review mechanisms.

Outcome/Impact: The 2026 ASP is significantly more elaborate than the 2012 model: it now offers capacity development, pro bono support, an applicant counselor, a 75–85% evaluation-fee reduction, bid credits, and reduced base registry fees. That is evidence that the logic of AFRALO's criticism was eventually internalized, at least partially. [7]

Gaps/Unresolved Issues: The unresolved issue is no longer whether support exists, but whether support produces regionally equitable results. ICANN's current ASP materials explain the benefits available, but they do not themselves prove successful African conversion from support to delegated strings. [8]

Lessons Learned: Support programs should be evaluated by results, not by menu items.

Forward-Looking Insight: AFRALO should demand a public ASP scorecard disaggregated by region, applicant type, eligibility outcome, application completion, evaluation stage, and delegation result.

Statement: ICANN African Community on the Low African Participation in the Applications for New gTLD / ICANN44 Prague, June 2012

Key Issue: After the 2012 round's application reality became visible, AFRALO reframed the problem as systemic underrepresentation rather than lack of African interest. It pointed to weak promotion, near absence of a domain-name industry in parts of Africa, and very low registrar presence.

AFRALO Position: AFRALO called for stronger communications, local stakeholder empowerment, timely awareness campaigns before future rounds, and even positive discrimination or exceptional facilitation measures if necessary.

Outcome/Impact: The later ICANN82 statement shows that the diagnosis remained valid over a decade later. Africa's historic underrepresentation in new gTLD applications was not corrected by passive continuation of global processes. [6]

Gaps/Unresolved Issues: Awareness and outreach were only part of the problem. Market infrastructure, financing, registry/registrar ecosystems, and the business case for applications remained unresolved.

Lessons Learned: Inclusion measures introduced after an application window or after market capture has already occurred are remedial, not preventative.

Forward-Looking Insight: AFRALO should push for pre-round readiness programs, not just round-time support.

Statement: AFRALO-AfrICANN Declaration of the Joint Meeting of the African Community in Beijing / ICANN46 Beijing, April 2013
Partial reconstruction based on the uploaded excerpt.

Key Issue: AFRALO broadened the debate from individual applicant support to ecosystem readiness by proposing a development fund for developing countries, with a strong focus on African registrar accreditation, skills transfer, local training, and support for registries and registrars.

AFRALO Position: The statement argued that Africa's participation deficit could not be solved applicant-by-applicant. It required a development fund and an ecosystem strategy to build the domain-name market itself.

Outcome/Impact: The statement's longer-term importance lies in its analytical shift: AFRALO moved from access-to-program arguments to market-development arguments. That broadened later Africa Strategy and participation discussions, even though no permanent ICANN-run development fund matching AFRALO's vision emerged in the sources reviewed.

Gaps/Unresolved Issues: Financing for ecosystem-building remained fragmented and ad hoc. There was no durable, transparent fund with public reporting against African market-development goals.

Lessons Learned: Applicant support is too narrow if the surrounding industry is weak.

Forward-Looking Insight: AFRALO should revive the development-fund logic in current form: a transparent Africa DNS ecosystem facility or program, with partners, measurable outputs, and explicit accountability.

Statement: IANA Stewardship Transition and ICANN Accountability Seen by the African Community / ICANN51 Los Angeles, October 2014

Key Issue: AFRALO recognized that the IANA transition was not just a technical transition but a legitimacy test for ICANN. It linked the transition directly to accountability and insisted that the process must be bottom-up and open to developing-region participation.

AFRALO Position: AFRALO welcomed the NTIA transition request, endorsed a bottom-up process, called for awareness and capacity building on IANA functions, and asked the naming, numbering, and protocol communities, as well as the ICG and accountability group, to ensure African views were considered.

Outcome/Impact: ICANN's stewardship-transition record confirms that the process was organized as an inclusive multistakeholder effort involving the ICG, CWG, CRISP Team, and IANAPLAN, and that the transition formally completed on 1 October 2016. [9]

Gaps/Unresolved Issues: Inclusion in procedure did not automatically produce equality of influence. AFRALO's participation concern was only partially resolved because the transition architecture improved formal openness but not the distribution of policy capacity.

Lessons Learned: Institutional design reform must be judged by who can effectively use it, not only by whether representatives are nominally invited.

Forward-Looking Insight: AFRALO should carry this same standard into Review of Reviews: process reform is insufficient unless it includes participation-capacity safeguards.

Statement: ICANN Accountability / ICANN52 Singapore, February 2015

Key Issue: AFRALO found that the existing mix of bylaws, commitments, contracts, and jurisdictional anchors was not enough to meet community expectations in a post-NTIA environment.

AFRALO Position: AFRALO set out accountability design principles: diversity, timely implementation, minimal but sufficient institutional change, preservation of the multistakeholder and bottom-up models, no stakeholder privilege, community empowerment, DNS stability, and public-interest orientation.

Outcome/Impact: ICANN's own transition history confirms that accountability work was formally launched in response to community calls for broader and independent mechanisms, leading to the CCWG-Accountability process and its two-work-stream structure. [10]

Gaps/Unresolved Issues: AFRALO's principle of "equal footing" remained more normative than operational. The institutional reforms that followed strengthened legal accountability, but they did not eliminate disparities in who had time, expertise, and support to exercise the new powers.

Lessons Learned: Good accountability design principles need accompanying usability safeguards.

Forward-Looking Insight: AFRALO should now reframe "equal footing" as measurable inclusion: who speaks, who drafts, who chairs, who appeals, and whose positions are reflected in outcomes.

Statement: IANA and ICANN Accountability Transition – Africa Perspective / ICANN54 Dublin, October 2015

Key Issue: AFRALO focused on transition completion risk, coordination among the operational communities, the design of community powers, and timing of the CCWG final report.

AFRALO Position: AFRALO welcomed progress but warned that critical decisions, such as the separation of related IANA operations, should not rely on merely informal coordination among communities. It also rejected the idea that community powers should be exercised only through SO/AC chairs and reiterated a single community-power approach to board recall.

Outcome/Impact: ICANN's implementation record shows that the transition architecture ultimately included PTI, the CSC, RZERC, SLAs, revised bylaws, and accountability enhancements across mapped tracks. [11]

Gaps/Unresolved Issues: The formal implementation of structures did not settle the issue AFRALO raised most sharply: whether the community could actually understand and mobilize its powers without becoming dependent on insiders or office-holders.

Lessons Learned: Accountability concentrated in procedural gatekeepers risks undermining the bottom-up ethos it claims to protect.

Forward-Looking Insight: AFRALO should continue to argue that accountability powers must be community-usable, not chair-mediated in practice.

Statement: Enhancing ICANN Accountability: the CCWG Final Proposal / ICANN55 Marrakesh, March 2016

Key Issue: AFRALO moved from supporting accountability reform in general to challenging specific features of the CCWG final proposal, including the lowered threshold for spilling the entire board, unequal treatment of SOs and ACs, and the risk that human-rights language might exceed ICANN's mission.

AFRALO Position: AFRALO supported accountability reform but insisted on balance: not making drastic community powers too easy to use, maintaining equal footing among the components of the empowered community, and keeping human-rights commitments within ICANN's mission boundaries.

Outcome/Impact: ICANN's official WS2 implementation page explains that Work Stream 1 concluded in 2016 to enable the transition, and that the Board later adopted all WS2 consensus recommendations in November 2019. AFRALO's Marrakesh intervention therefore sits at the critical hinge point between design and implementation. [12]

Gaps/Unresolved Issues: The framework that emerged solved important legal-accountability issues but did not obviously solve the accessibility of those powers to underrepresented communities. AFRALO's deeper concern about balance therefore persists.

Lessons Learned: Accountability reform can overcorrect if it empowers crisis tools without equally investing in inclusive, ordinary accountability practice.

Forward-Looking Insight: Review reform should test not only whether mechanisms exist, but whether their thresholds, procedures, and workload make them realistically exercisable by globally diverse actors.

Statement: IANA Transition and ICANN Accountability – Africa Perspective / ICANN56 Helsinki, June 2016

Key Issue: AFRALO shifted from final-proposal debate to implementation control. It focused on keeping implementation within the scope of the adopted proposals, discouraging further delay, and ensuring meaningful PTI separation and staffing autonomy. It also warned that Work Stream 1 had moved too fast for many volunteers, reducing diversity of participation.

AFRALO Position: AFRALO supported timely completion of the transition, urged the IOTF to remain within scope, argued that PTI should be legally and operationally distinct, and reiterated that accountability work must not be rushed at the expense of inclusiveness.

Outcome/Impact: ICANN's implementation page confirms that PTI, the CSC, RZERC, SLAs, and revised bylaws were among the required work items mapped to the transition. [11]

Gaps/Unresolved Issues: Legal separation did not automatically create perceived autonomy, and process pace remained an unaddressed inequality issue.

Lessons Learned: Implementation fidelity and participation diversity are both accountability questions.

Forward-Looking Insight: AFRALO should insist that future review and implementation processes publish participation-burden assessments and mitigation plans.

Statement: IANA Stewardship Transition and ICANN Accountability: the African Perspective / ICANN57 Hyderabad, November 2016

Key Issue: After transition completion, AFRALO focused on Work Stream 2 scope discipline, mission limits, and the cumulative burden of nine concurrent sub-groups on community diversity and volunteer sustainability.

AFRALO Position: AFRALO congratulated the community on completion of the transition, strongly urged the WS2 sub-groups to stay within Annex 12 scope and ICANN's narrow mission, and suggested phasing subgroup work to reduce burnout and improve diversity of participation.

Outcome/Impact: WS2 continued after transition and, as ICANN records note, its final report was submitted in 2018 and its consensus recommendations were adopted by the Board in November 2019. [12]

Gaps/Unresolved Issues: The governance system preserved the workstreams but did not solve the problem AFRALO identified: multiple concurrent processes continue to favor well-resourced participants.

Lessons Learned: Volunteer overload is not an incidental participation issue; it is a structural accountability issue.

Forward-Looking Insight: Review of Reviews should explicitly account for workload concentration and create mechanisms for phased, accessible participation.

Statement: At-Large Review: an African Perspective / ICANN58 Copenhagen, March 2017

Key Issue: AFRALO argued that the review had crossed from "review" into "reform" without clearly connecting recommendations to diagnosed problems. It specifically resisted proposals that would weaken ALS-based legitimacy by replacing the ALS/RALO/ALAC structure with an individual-member-centric model, removing At-Large working groups, changing the Seat 15 process, and replacing ATLAS.

AFRALO Position: AFRALO defended ALSes as the grounded institutional basis for end-user legitimacy, especially in developing countries, and argued that weakening that structure would reduce diversity and public-interest credibility.

Outcome/Impact: The At-Large Review moved through Board receipt and action, a feasibility assessment, implementation planning, status reports, a final implementation report in June 2020, Board acceptance in September 2020, and eventual deferral of the third review in 2022. [13]

Gaps/Unresolved Issues: The review process never fully solved the traceability problem AFRALO identified. Official pages document the implementation sequence, but not in a way that clearly maps African objections to adopted or rejected outcomes.

Lessons Learned: Review systems lose legitimacy when public comment is visible but decision-path traceability is weak.

Forward-Looking Insight: AFRALO should make response matrices and implementation traceability a core condition of review reform.

Statement: The General Data Protection Regulation / ICANN60 Abu Dhabi, November 2017
Partial reconstruction based on the uploaded excerpt.

Key Issue: AFRALO recognized GDPR as a transformative external legal intervention with specific African implications because many African domain registrations and data flows depended on EU-based or EU-linked services. AFRALO also noted that many African countries lacked harmonized or GDPR-equivalent privacy frameworks.

AFRALO Position: AFRALO emphasized awareness, compliance planning, and the need to understand both positive and negative effects of GDPR on Africa. It urged stakeholders to examine how the regulation would affect them and to avoid harmful spillovers onto non-EU African users and customers.

Outcome/Impact: The importance of the statement is confirmed by the fact that, by May 2018, the ICANN Board had to approve a Temporary Specification for gTLD registration data in response to GDPR, a step that AFRALO later discussed in Panama.

Gaps/Unresolved Issues: Abu Dhabi identified the compliance problem, but it did not yet resolve the deeper governance question: how to preserve privacy, due process, consumer protection, and abuse-response capabilities in a globally consistent model.

Lessons Learned: ICANN accountability is increasingly shaped by external law, and AFRALO needs earlier legal horizon-scanning to avoid purely reactive positions.

Forward-Looking Insight: AFRALO should build a pattern of anticipatory legal analysis for major cross-border regulatory developments affecting ICANN's mission.

Statement: The General Data Protection Regulation / ICANN62 Panama, June 2018
Partial reconstruction based on the uploaded excerpt.

Key Issue: AFRALO's Panama statement sharpened the governance critique. After the Board approved the Temporary Specification on 17 May 2018, AFRALO argued that no unified access model existed for nonpublic data, that registries and registrars were implementing layered access unevenly, and that limiting the approach to EEA-linked data undermined universality and public-interest protection.

AFRALO Position: AFRALO defended the universality of the Internet and the importance of WHOIS data for intellectual property, consumers, law enforcement, and end-user security, while still taking GDPR compliance seriously.

Outcome/Impact: The statement located Africa firmly inside the global registration-data governance debate and correctly identified a long-lived policy tension that remains unresolved years later. Specific Reviews and accountability work continue to sit within Article 4.6, while registration-data and transparency questions continue to test ICANN's accountability system. [14]

Gaps/Unresolved Issues: A globally consistent, rights-respecting, public-interest-aware access model remains elusive.

Lessons Learned: Temporary governance arrangements can become semi-permanent accountability gaps if they are not paired with clear resolution timelines and public-interest metrics.

Forward-Looking Insight: AFRALO should press for transparent access metrics, appeal rights, denial reasons, and periodic public-interest impact assessments.

Statement: Evolving the ICANN Multi-stakeholder Model / ICANN65 Marrakech, June 2019

Key Issue: AFRALO framed MSM effectiveness as a legitimacy problem rooted in trust deficits, cultural blind spots, regional operational constraints, visa denial, connectivity inequality, policy complexity, leadership imbalance, burnout, narrow stakeholder self-interest, and insufficient public-interest orientation.

AFRALO Position: AFRALO argued that the MSM was "far from effective" unless ICANN tackled structural inequality in participation and representation, simplified policy development, balanced leadership, and renewed compromise and public-interest culture.

Outcome/Impact: ICANN later institutionalized the effort to improve MSM effectiveness as part of the FY21–25 strategic objective on strengthening the model. [15]

Gaps/Unresolved Issues: The official MSM-improvement frame is still more managerial than distributive. It focuses on effectiveness, but AFRALO's deeper critique is about who can participate on competitive terms.

Lessons Learned: An open multistakeholder process can remain substantively unequal if participation costs and procedural complexity are distributed unevenly.

Forward-Looking Insight: AFRALO should push for MSM equity indicators, not only MSM health narratives.

Statement: ICANN Multi-stakeholder Model and the Increase in National Legislation and Regulations / ICANN70 Cancun, March 2021

Key Issue: AFRALO explicitly widened the accountability lens beyond internal reform and identified external threats to ICANN's bottom-up model from national Internet regulation, privacy law, security narratives, and platform-era governance trends.

AFRALO Position: AFRALO recommended government capacity building, a repository of regulatory changes and their impact on the MSM, preservation of best practices, awareness raising, studies on DNS-market effects, collaboration with bodies such as the ITU, support for standards uptake, and stronger technological watch.

Outcome/Impact: Even where no formal Board response was identified in the primary-source set reviewed for this report, the statement is analytically important because it anticipated a central challenge now facing ICANN: institutional accountability depends not only on internal procedure but also on how external law fragments or distorts the governance environment.

Gaps/Unresolved Issues: AFRALO proposed the right instruments, but there is still no clearly visible Africa-facing observatory or repository that turns this recommendation into ongoing accountability infrastructure.

Lessons Learned: ICANN's multistakeholder legitimacy can be weakened indirectly by external legal developments even if its internal procedures remain unchanged.

Forward-Looking Insight: AFRALO should propose a standing Africa DNS and digital-regulation observatory as part of its accountability agenda.

Statement: Improvement of African Participation in ICANN / ICANN77 Washington DC, June 2023

Key Issue: AFRALO reframed accountability as participation equity. The statement focused on how underrepresentation, visa barriers, low local-language accessibility, and weak youth/women pathways reduce African influence in the ICANN ecosystem.

AFRALO Position: AFRALO made concrete institutional asks: a dedicated African Board seat, rotational meeting hosting, targeted visa support, youth mentorship, stronger women's participation, more UA ambassadors, and deeper engagement with African institutions.

Outcome/Impact: The Board's 25 October 2024 reply acknowledged that more work was needed, highlighted the Africa strategy, Nairobi office, increased meeting attendance, Coalition for Digital Africa, and UA/IDN work with the Association of African Universities, but pointed out that the bylaws already require at least one director from each geographic region and treated visa support as ongoing work rather than a new binding commitment. [16]

Gaps/Unresolved Issues: The Board response mainly catalogued existing activities; it did not commit to a dedicated seat, a meeting-rotation guarantee, or a measurable visa-remediation framework.

Lessons Learned: Precise asks produce more precise responses, but they also expose the distinction between structural change requests and programmatic requests.

Forward-Looking Insight: AFRALO should separate future participation asks into structural reforms and operational reforms, with clear metrics for each.

Statement: Internet Resource Management and Governance in Africa / ICANN78 Hamburg, October 2023
Partial reconstruction based on the uploaded excerpt and official response.

Key Issue: AFRALO linked ICANN legitimacy to material Internet-resource inequality in Africa, citing low Internet penetration, IPv4 scarcity, the growth need for IPv6, and the strategic importance of IP-address governance for digital inclusion and service quality.

AFRALO Position: AFRALO called for regional collaboration and policy harmonization, support for IPv6 transition, stronger governance oversight, advocacy, and stakeholder cooperation across Africa.

Outcome/Impact: ICANN's January 2024 response agreed with the importance of the issue but explicitly noted that ICANN alone could not achieve AFRALO's recommendations and described its role as limited, though important, with reliance on partners, RIR collaboration, and the Coalition for Digital Africa. [17]

Gaps/Unresolved Issues: This exposes a recurring AFRALO challenge: some regional problems are real and urgent but cannot be solved by ICANN alone. Without actor-specific accountability, good recommendations can dissipate across institutional boundaries.

Lessons Learned: AFRALO's legitimacy discourse is strongest when grounded in infrastructure realities, but it becomes more actionable when it allocates responsibility by institution.

Forward-Looking Insight: AFRALO should pair every ecosystem-wide recommendation with an actor map: what ICANN can do, what RIRs can do, what governments must do, and what community structures should track.

Statement: Promoting African Digital Identity in the Next gTLD Round: Addressing Challenges and Leveraging Support Mechanisms / ICANN82 Seattle, March 2025
Partial reconstruction based on the transmittal and Board response.

Key Issue: AFRALO returned to the new gTLD question with far greater policy maturity. It framed African digital identity, language, local relevance, and economic opportunity as accountability concerns because the previous round's distribution outcomes had been so unequal:

around 1,930 applications globally, only 17 from Africa, and only a tiny share of final delegations. [6]

AFRALO Position: AFRALO advocated awareness and capacity building, partnerships, alignment with digital transformation agendas, support for community TLDs, local technical and business support, and broader leveraging of ASP and related mechanisms. [18]

Outcome/Impact: The Board's July 2025 response was the most detailed response in the statement set reviewed. It pointed to global outreach from May 2024, over 25 outreach activities in Africa, targeted media campaigns in Kenya, Nigeria, and South Africa, over 7 million social-media impressions, monthly SubPro IRT reports, multilingual resources, and more than 30 pro bono professionals, about half of whom expressed interest in supporting Africa-based applicants. It also highlighted the broad ASP package and the live 2026 application cycle, which opened 30 April 2026 and closes 12 August 2026. [19]

Gaps/Unresolved Issues: The response remains input-heavy. It demonstrates extensive activity, but it does not yet demonstrate success in the metric that matters most: materially improved African application and delegation outcomes.

Lessons Learned: Repeated AFRALO advocacy did eventually produce a more targeted and better-instrumented ICANN response, which shows that persistence can improve institutional engagement.

Forward-Looking Insight: AFRALO should now make "post-round accountability" non-negotiable by requesting a public Africa outcome report after the round.

Annex 2

Comparison matrix

The table below condenses the evolution of AFRALO's positions from access and applicant equity to review legitimacy, participation equity, and outcome accountability. It is a synthesis of the detailed entries above. [20]

Year / ICANN	Topic	Core ask	Documented outcome	Unresolved gap
2010 / 39	New gTLD applicant support	Fee reduction + real assistance	ASP logic was later adopted, but African underrepresentation persisted. [6]	No outcome-based equity targets
2012 / 43	ASP design	Objective criteria, stronger outreach, more funding, review	2026 ASP now includes fee cuts, pro bono help, counselor, capacity building. [7]	No proof yet of African conversion into delegations
2012 / 44	Low African participation	Timely awareness, local empowerment, registrar growth	Later record confirms underrepresentation remained severe. [6]	Weak local DNS market capacity
2013 / 46	Development fund	Ecosystem financing for registrars/registries/training	Broadened debate beyond individual applicants.	No durable development fund
2014 / 51	IANA transition + accountability	Bottom-up process; African inclusion; capacity building	Inclusive transition process created and completed in 2016. [21]	Inclusion in process ≠ equal influence
2015 / 52	ICANN accountability	Diversity, equal footing,	CCWG accountability	New powers remained

Year / ICANN	Topic	Core ask	Documented outcome	Unresolved gap
		community empowerment	process and two-work-stream model followed. [22]	unevenly usable
2015 / 54	Transition governance	Better coordination; usable community powers	Transition implementation included PTI/CSC/RZERC. [11]	Complexity and procedural mediation
2016 / 55	CCWG final proposal	Balanced thresholds; equal SO/AC footing	WS1/WS2 accountability architecture completed. [23]	Accessibility of accountability tools
2016 / 56	Transition implementation	Scope discipline; PTI autonomy; diversity	PTI and related structures implemented. [11]	Legal separation vs practical independence
2016 / 57	Post-transition / WS2	Scope discipline; phased workload	WS2 continued and the Board adopted consensus recommendations. [23]	Volunteer overload and diversity deficits
2017 / 58	At-Large review	Preserve ALS legitimacy; resist de-grounding reform	Review implemented; final implementation report accepted in 2020. [24]	Weak traceability from comment to outcome
2017 / 60	GDPR	Awareness, compliance, African impact analysis	The problem escalated into Temporary Specification.	No globally balanced access model
2018 / 62	GDPR / WHOIS	Universality, public-interest access,	Temporary Specification acknowledged the problem	Rights-respecting and consistent

Year / ICANN	Topic	Core ask	Documented outcome	Unresolved gap
		nonfragmentation	but not its final solution.	access still unresolved
2019 / 65	MSM effectiveness	Trust, equity, simplification, public-interest culture	MSM effectiveness became a strategic objective. [15]	Power asymmetry remained
2021 / 70	External laws and MSM	Capacity building, regulatory repository, impact studies	Important analytical expansion of AFRALO agenda.	No visible Africa-facing observatory
2023 / 77	African participation	Board seat, visas, rotation, youth, women, local languages	The board acknowledged the issue, cited ongoing activity, but no major new commitments. [25]	Participation still measured more by activity than influence
2023 / 78	Internet resource governance	IPv6, harmonization, collaboration, infrastructure policy	ICANN replied that the problem is real but beyond ICANN alone. [17]	Responsibility diffusion across institutions
2025 / 82	African digital identity in next gTLD round	Awareness, ASP uptake, partnerships, localized support	Detailed Board response; 2026 round is live; support tools expanded. [26]	No guarantee yet of improved African delegation outcomes

Cross-cutting gaps and lessons

- The first cross-cutting gap is **implementation traceability**. AFRALO repeatedly made concrete recommendations, but only rarely was there a public mechanism showing which

recommendations were accepted, modified, rejected, or implemented. The At-Large review sequence is illustrative: the official page records report publication, Board action, feasibility assessment, implementation planning, status reports, and final acceptance, but that timeline does not itself reveal how AFRALO's specific concerns affected the final design. The same pattern appears in the Board responses to ICANN77 and ICANN78, where ICANN acknowledged the statements and described ongoing work, but did not map each community to a concrete disposition. That is why response matrices should be central to Review of Reviews. [27]

- The second recurring gap is **participation inequality as an accountability defect**. AFRALO's history shows that accountability is not exhausted by independent review, bylaws language, or public comment opportunities. It also depends on whether communities can bear the cost of participation. AFRALO identified this in relation to application fees, volunteer fatigue, bandwidth limitations, visa denials, policy complexity, lack of local-language support, and the dominance of better-resourced actors. Review reform that reduces duplication but keeps these asymmetries intact would solve only part of the problem.
- The third lesson is that **formal inclusiveness and substantive influence are different things**. The IANA transition process was formally inclusive and geographically broad, and it produced durable accountability structures. Yet AFRALO's later statements show that Africa continued to experience barriers to influence across review work, MSM reform, and policy participation. That means the next phase of accountability reform should not merely preserve access to discussion; it should measure influence pathways and correct skewed participation conditions. [9]
- The fourth gap is **review complexity without visible public value**. AFRALO's At-Large review intervention and its WS2 workload concerns both point to the same structural problem: accountability systems can become too heavy, too concurrent, or too abstract for many end-user actors. The current Review of Reviews work correctly recognizes that the legacy reviews system is not functioning optimally. The uploaded CCG outline proposes a more scoped and dashboarded Accountability and Transparency Review, together with Structural and On-Demand reviews, while the current Bylaws-amendment proceeding proposes a time-bounded pause with safeguards. AFRALO's record supports these reforms, but only if they produce more transparency, not merely fewer reviews. [4]
- The fifth gap is **actor ambiguity**. Some AFRALO statements, especially on Internet-resource governance and broader digital inclusion, correctly diagnose regional problems but spread responsibility across institutions. ICANN's reply to ICANN78 makes this explicit by noting both the importance of the African concerns and the limits of ICANN's ability to solve them alone. Going forward, AFRALO statements should differentiate between what must be done by ICANN, what belongs to RIRs or other DNS institutions, and what depends on governments or regional bodies. That will make the statements both more actionable and harder to acknowledge without follow-up. [17]
- The sixth lesson is that AFRALO's more recent statements are stronger because they are **more operational and more metrics-ready**. ICANN77 and ICANN82 made sharper tasks than many earlier statements: visa assistance, meeting rotation, dedicated Board representation, targeted outreach, monthly reports to the SubPro IRT, multilingual resources, applicant counseling, and mentorship pipelines. Even where ICANN did not grant the most structural tasks, the responses were more specific. That should guide

AFRALO's Review of Reviews input: specificity yields better accountability than broad exhortation. [28]

Consolidated AFRALO position and next steps

AFRALO's consolidated position is that ICANN's accountability and transparency mechanisms must now be judged by **traceability, inclusion, and measurable effect**, not merely by formal existence. AFRALO's historical record does not support abolishing or hollowing out reviews. It supports **focused reform with guardrails**: fewer overlaps, better scoping, more public rationale, stronger implementation follow-through, and deliberate mitigation of participation asymmetry. That position aligns with the current Review of Reviews trajectory, which is trying to design a more workable system while preserving accountability obligations in Article 4.6. [29]

Five measurable next steps follow from that position.

1. The first is a **mandatory public response matrix** for every major review and public comment process. The matrix should show each recommendation or community input, its source, whether it was accepted, modified, deferred, or rejected, the rationale, the responsible owner, and the next milestone. AFRALO's experience across ICANN58, ICANN77, and ICANN78 shows that acknowledgement letters and implementation pages are not enough. [30]
2. The second is an **implementation tracker and dashboard** for reviews and regional statements. The uploaded CCG outline already points toward dashboards in the refreshed reviews system. AFRALO should explicitly demand that dashboards include not just schedule status, but implementation owners, completion evidence, unresolved dependencies, and whether the affected community confirms that the recommendation was substantively addressed.
3. The third is an **inclusion KPI framework**. The new reviews system should require public reporting on the composition of scoping groups and review teams by geography, stakeholder affiliation, gender balance, language support, newcomer participation, and use of asynchronous channels. It should also disclose consultation lead times and the number of inputs received from each region or SO/AC. Without such metrics, "multistakeholder" continues to function as a principle without a measurement discipline.
4. The fourth is a set of **review restart safeguards**. AFRALO should support a time-bounded pause of Specific Reviews only if it remains strictly temporary and publicly auditable. At minimum, the current 12-month progress window and maximum 24-month total pause should be preserved; quarterly public progress reports should be mandatory; a public restart schedule should be published no later than the end of the first 12 months; and any extension should be accompanied by an explicit explanation of why the refreshed system is not yet ready and what evidence justifies continued pause. ICANN's current public comment already reflects the logic of time-bounded safeguards; AFRALO should strengthen it with reporting, traceability, and restart transparency. [4]
5. A fifth, AFRALO-specific next step should be external to ICANN's formal reviews but essential to sustained influence: an **AFRALO accountability and implementation tracker** covering its own historical statements. This tool should list the statement, meeting, topic, key asks, official reply, follow-up action, implementation status, and remaining gap. That would convert AFRALO's institutional memory from archival knowledge into a live accountability asset.

Key sources

Refined Outline of Suggested Reviews System from the Review of Reviews Cross Community Group, dated 18 April 2026, which outlines the proposed three-pillar reviews framework and the scoping/dashboard approach.

AFRALO–AfrICANN statement texts for ICANN39, ICANN43, ICANN44, ICANN46, ICANN51, ICANN52, ICANN54, ICANN55, ICANN56, ICANN57, ICANN58, ICANN60, ICANN62, ICANN65, ICANN70, ICANN77, ICANN78 and ICANN82.

ICANN's stewardship-transition and accountability history pages, documenting the launch of the transition process, the two-work-stream accountability structure, the completion of the transition, and the implementation architecture including PTI, CSC, RZERC, and revised bylaws. [33]

ICANN's Work Stream 2 implementation page, documenting that WS1 concluded in 2016 and that the Board adopted all WS2 consensus recommendations in November 2019. [12]

ICANN's At-Large Review page, documenting Board action, feasibility assessment, implementation plan acceptance, final implementation report, and later deferral of the third At-Large review. [13]

ICANN Board and org correspondence responding to AFRALO's statements on African participation, Internet-resource governance in Africa, and African digital identity in the next gTLD round. [34]

ICANN's current public comment materials on the Standard Bylaws Amendment concerning Specific Reviews, confirming the time-bounded pause logic and the preservation of Article 4.6 text. [4]

ICANN's current New gTLD Program and Applicant Support Program pages for the 2026 round, including the ASP support package and the 30 April 2026 to 12 August 2026 application window. [8]

[1] [6] [18] [26] https://www.icann.org/en/system/files/correspondence/elminiawi-to-sinha-23may25-en.pdf

https://www.icann.org/en/system/files/correspondence/elminiawi-to-sinha-23may25-en.pdf

[2] [16] [25] [28] [34] https://www.icann.org/en/system/files/correspondence/sinha-to-elminiawi-25oct24-en.pdf

https://www.icann.org/en/system/files/correspondence/sinha-to-elminiawi-25oct24-en.pdf

[3] [11] https://www.icann.org/stewardship-implementation

https://www.icann.org/stewardship-implementation

[4] [29] https://www.icann.org/en/public-comment/proceeding/standard-bylaws-amendment-transition-article-on-specific-reviews-11-02-2026

https://www.icann.org/en/public-comment/proceeding/standard-bylaws-amendment-transition-article-on-specific-reviews-11-02-2026

[5] [17] [20] [30] [32] https://www.icann.org/en/system/files/correspondence/costerton-to-elminiawi-30jan24-en.pdf

https://www.icann.org/en/system/files/correspondence/costerton-to-elminiawi-30jan24-en.pdf

[7] [8] https://newgtldprogram.icann.org/en/application-rounds/round2/asp

https://newgtldprogram.icann.org/en/application-rounds/round2/asp

[9] [10] [21] [22] [33] https://www.icann.org/stewardship-accountability

https://www.icann.org/stewardship-accountability

[12] [23] https://www.icann.org/resources/work-stream-2-implementation-en

https://www.icann.org/resources/work-stream-2-implementation-en

[13] [24] [27] [31] https://www.icann.org/resources/reviews/org/alac

https://www.icann.org/resources/reviews/org/alac

[14] https://www.icann.org/resources/reviews/specific-reviews

https://www.icann.org/resources/reviews/specific-reviews

[15] https://www.icann.org/resources/pages/governance-plan-improve-multistakeholder-model-2019-04-08-en

https://www.icann.org/resources/pages/governance-plan-improve-multistakeholder-model-2019-04-08-en

[19] https://www.icann.org/en/system/files/correspondence/sinha-to-elminiawi-29jul25-en.pdf

https://www.icann.org/en/system/files/correspondence/sinha-to-elminiawi-29jul25-en.pdf

Lead Analyst: Godsway Kubi

Principal Contributors:

David Inem, Ekwealor Naomi, Rumana Kabir Aminu, Abubakar Hassan Muhammad, Thoko Miya, Daniel Nanghaka, Musa Bangura, Confidence Osein, Bisi Josh-Falade, Gloria Frimpomaah Amofah-Adjekum, Kiiza Patrick, Mawuko Kudzo, Chokri Ben Romdhane, Nkoro, N. E, Ibrahim Bashir Aliyu, Kenechukwu Okekenta, Samwel Kinuthia Kariuki, Stephen Owusu-Addae

Contributors:

Christabel Mebaghandu, Gbemisola Esho, Maureen Owusu-Addae, Tinuade Oguntuyi, Nefertiti Marquez, Olabimpe Adeloro, Ross Moutele, Samuel Boah, Ugonna Wogu, Yaa Kumi Asare-Bediako, Remmy Nweke, Houda CHIHI, Madiha Mahamat Al-Hadi, Hadia Elminiawi, Aziz Hilali, Hervé Sètondji Hounzandji, Abdeldjalil Bachar Bong