

Submission: Review of Reviews CCG Draft Report

4 August 2026

The ccNSO Council appreciates the opportunity to comment on the Draft Report prepared by the Review of Reviews Cross Community Group (Reviews CCG). To avoid any misunderstandings, this comment is a ccNSO Council comment, and the views expressed in this comment should not be interpreted as views from the ccNSO members, nor from individual ccTLD managers.

Observations and suggestions

- **Draft Report addresses major points of the Reviews CCG's charter**

- The ccNSO Council congratulates the CCG on delivering its work on time and addressing the vast majority of the issues set out in the charter.
- This achievement demonstrates that the community and ICANN can deliver a major piece of work on schedule. It is a clear example of the multistakeholder model delivering effective and timely results.

- **Scope of the Reviews System**

- The ccNSO Council supports the proposed definition of Purpose of Reviews.
- The current proposal provides the necessary review mechanisms to achieve its objectives in a structured yet flexible manner. It enables the scope and timing of reviews to be deferred, limited, or expanded, as appropriate and at the direction of the relevant stakeholders.
However, while the Competition, Consumer Trust, and Consumer Choice (CCT) Review and the Registration Data Services (RDS) Review are important accountability mechanisms for the gTLD space, they are not applicable across the broader ICANN ecosystem. Requiring completion of a full CCT and RDS review cycle as a prerequisite would therefore place undue emphasis on one part of ICANN while offering limited relevance to other key stakeholders, including ccTLDs, Root Server Operators, and Regional Internet Registries (RIRs).
- Recognizing that Security, Stability, and Resiliency (SSR) is fundamental to ICANN's mission, it should nevertheless be defined with sufficient specificity when used as a review criterion or requirement. By its nature, SSR is a broad concept

and may otherwise lack the precision needed to guide consistent and meaningful reviews.

- **Separation of roles**

- The proposal establishes appropriate checks and balances by separating the scoping and review functions, with the Review Scoping Committee (RSC) developing the charter and an independent Community Review Team conducting the review. Review criteria are agreed in advance through a transparent, community-driven process, providing predictability and accountability. The proposal also places clear limits on review deferrals to avoid indefinite postponement of Bylaws-mandated reviews. Finally, the Consequential Effects Review promotes mutual accountability by ensuring that changes affecting the broader ICANN community are subject to cross-community consideration, while preserving the autonomy of individual SOs and ACs.
- The proposal should further separate the roles of those setting the review scope, conducting the review, and being reviewed. Board and ICANN org representatives should participate in the Review Scoping Committee (RSC) and Community Review Teams as non-voting participants or designated resources, rather than decision-makers. This separation is necessary to preserve the independence, credibility, and perceived legitimacy of the review process, as those subject to review should not influence the standards against which they are assessed or the conclusions reached.
- Any topics removed during scoping should be published with the rationale for their exclusion to ensure transparency and accountability.
- In addition, individuals should not serve on both the RSC and the Community Review Team for the same review. Exceptions should be permitted only in exceptional, well-justified circumstances that are clearly documented and transparently communicated, in order to avoid potential conflicts of interest and to reinforce confidence in the process.

- **Timelines**

- The proposal establishes clear timelines and accountability mechanisms for certain phases of the review processes, including the review team timeline, Board action period, and deferral limits. However, other important phases, including scoping, sign off and implementation, do not currently have defined timeframes, creating potential for delays in the overall process.
- In addition, the current framework provides limited means to address delays following Board approval, as existing mechanisms do not provide effective

recourse for implementation slippage. Establishing defined timelines and requiring documented implementation plans adopted by resolution, and providing for transparent reporting on delays would strengthen accountability without requiring new powers or a redesign of the process.

- **Volunteer Resourcing**

- The composition of the Community Review Team should be reconsidered to ensure effective and balanced participation. A structure with one representative per SO and AC, along with Board and ICANN org representatives, would provide a more sustainable model. Alternates could be included on an optional basis to accommodate meeting schedules and time zone challenges. This approach preserves equal representation by ensuring that each SO and AC has one representative, while reducing barriers for groups with limited volunteer capacity. It supports the timely formation and sustainability of review teams, helps mitigate volunteer fatigue, and retains flexibility through the use of optional alternates.
- In addition, as mentioned before, individuals should not serve on both the RSC and the Community Review Team for the same review unless in exceptional, well-justified circumstances. Therefore, the available pool of volunteers should be taken into account.

On behalf of the ccNSO Council,

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