To: Tripti Sinha, Chair of the ICANN Board of Directors

cc: Patricio Poblete and Byron Holland, ccNSO appointed Board Members.
    Kurtis Lindqvist, President and CEO ICANN
    Theresa Swinehart, SVP, Global Domains & Strategy
    Russ Weinstein, SVP, Policy Development Support

Continuation of the Pilot Holistic Review and the evaluation of reviews in general

15 April 2025

Dear Tripti,

As you know the full Board and the ccNSO Council do not meet at ICANN community forums, including the latest one in Seattle. However, following your remarks at the SO/AC Chairs roundtable at ICANN82, the meeting with the co-chairs of the Pilot Holistic Review and their letter dated 24 March 2025, we would like to share with you our views with respect to the continuation of the Pilot Holistic Review and the evaluation of the purpose, frequency and need for reviews in general.

With respect to the Pilot Holistic Review (PHR), the ccNSO Council strongly supports the suggestion from the PHR co-chairs to split the two sides of the ATRT3 review recommendations. Implementing this split should start with empowering a Continuous Improvement Program (CIP) Review drafting team to work closely with the Supporting Organizations, Advisory Committees and the Nominating Committee (SOs/ACs/NC) to ascertain their CIP methodologies and design a streamlined review of the CIP work. This suggestion of the PHR co-chairs, taken together with the proposed CIP Framework - which includes as principles that SOs, ACs and Nomcom fulfill their purpose, are effective and efficient - allows us as a community to test an approach which, if considered successful, could replace the organizational reviews.

With respect to the second, 'structural review' part, the ccNSO Council strongly supports your suggestions that prior to starting a new cycle of reviews, including ATRT4, we as a community need to take a step back and evaluate the breadth and number of reviews by looking at purpose, scope, frequency and efforts involved to conduct **all** of the current ICANN Bylaw mandated reviews.

The below seeks to provide you with more detailed input on the ccNSO Council's view, which we trust will be helpful.

We support the need to regularly review the performance and operation of the ccNSO and its Council, and to review whether the ccNSO has a continuing purpose in the ICANN structure. It is our experience, based on the two organizational reviews of the ccNSO to date, that organizational reviews are not an effective, nor an efficient method both in terms of outcomes and use of resources.

In essence, we believe that the concerns of ATRT3 with respect to the organizational reviews[1] are, in 2025, even more relevant and valid: "*ICANN has reached a point of diminishing returns with respect to Organizational Reviews in the current format. As noted, SOs and ACs have significantly evolved since the inception of Organizational Reviews in 2003* (as part of ICANN's Evolution and Reform initiative) *and will continue to do so with the implementation of the CCWG Accountability WS2 recommended guidelines. Additionally, there are significant issues with the backlog of review recommendations, timing and cadence of the independent examiners recommendations*".

As ccNSO Council we have always been very mindful of the need for an added value arising from a review, and from the efforts involved. For that reason we have declined to participate in the second Registration Directory Service (RDS) review.

As part of this consideration we have mapped all reviews since 2003 on date of required launch, actual starting date, duration of review, duration of board consideration of the recommendations and implementation. The result of this mapping exercise shows a grim picture and it becomes apparent that the current structure of reviews is unsustainable. Bylaw mandated dates to launch reviews are not met, and reviews start late. Due to the duration and cycle of reviews, consideration of the recommendations by the Board and the requirements of implementation, reviews are launched before the recommendations of previous reviews have been implemented and before the issues covered, (i.e. which the recommendations were supposed to address) have had a chance to be resolved.

To address this vicious cycle, the ccNSO Council has suggested in the past that ICANN adjust the timing of the two functional Bylaw mandated reviews: the IANA Naming Function Review, which is now also suggested by the 2nd IFRT itself, and together with the GNSO Council has deferred the launch of the 3rd CSC review, which we will most likely do again in August this year, pending the implementation of recommendations of the 2nd CSC review.

To reiterate, the ccNSO Council strongly supports your suggestion that before we embark again on the design of a structural review we take a step back and evaluate the breadth and number of reviews by looking at purpose, scope, frequency and efforts involved for all of the ICANN Bylaw mandated reviews.

To achieve this goal we suggest that we as a community start organizing a dialogue at ICANN84 in Oman, and until closure of that dialogue defer any decision on the launch of any reviews, including ATRT4, until closure of that dialogue or the community forum in 2026, whatever comes first. The ccNSO Council is available to help with organizing such a dialogue.

If you have any further questions regarding this letter, please do not hesitate to reach out.

Best regards,

Alejandra Reynoso
ccNSO Council Chair

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[1] As stated in the Final Report of ATRT3 page 68