

# Public Comment Summary Report

## Fundamental Bylaws Amendments on IANA-Related Reviews and CSC Charter Update

**Open for Submissions Date:**

Wednesday, 11 February 2026

**Closed for Submissions Date:**

Monday, 30 March 2026

**Summary Report Due Date:**

Monday, 13 April 2026

**Category:** Governance

**Requester:** ICANN Board

**ICANN organization contact(s):**

[samantha.eisner@icann.org](mailto:samantha.eisner@icann.org)

**Open Proceeding Link:**

<https://www.icann.org/en/public-comment/proceeding/fundamental-bylaws-amendments-on-iana-related-reviews-and-csc-charter-update-11-02-2026>

**Outcome:**

The comments on the Fundamental Bylaws Amendments on IANA-Related Reviews and CSC Charter Updates show broad ICANN community support for the changes as proposed. The comments did not evidence any specific items that require updating as a result of Public Comment, though there are some operational items for continued awareness. These include: attention to scheduling of future Periodic IANA Naming Function Reviews and CSC Effectiveness reviews to avoid overlap; ensuring that review teams remain effective in achieving their work; remaining watchful that the CSC is a high-performing group and initiating a CSC Effectiveness Review sooner if there are signs of degradation in performance; and future consideration of modifications or enhancements to the role of alternates if needed in the future.

The contributions show valuable engagement on ICANN's governing documents and continued support for the ICANN community's role in oversight of ICANN's performance of the IANA naming function.

## Section 1: What We Received Input On

We sought input on proposed Fundamental Bylaws Amendments to implement recommendations of the Second IANA Naming Function Review (IFR) and the most recent Customer Standing Committee (CSC) Effectiveness Review. The proposed Bylaws Amendments address:

- Updating the cadence of the IFRs to every five years from the delivery of the final report, as opposed to timing the five-year cycle from the initiation of the IFR (Article 18, Section 18.2).
- Updating the cadence of the CSC Effectiveness Review to every five years, as opposed to the current two-year review cycle (Article 17, Section 17.3).
- Updating the CSC membership to allow for the appointment of alternate members and liaisons (Article 17, Section 17.2).

Input was also sought on a proposed update to the CSC's Charter. The CSC Charter requires updating to define how alternates participate within the CSC. As those updates were being developed, updates to streamline the CSC Charter and reduce duplication with the ICANN Bylaws were also identified. Changes to the charter must be considered through Public Comment before being presented to the Country Code Names Supporting Organization (ccNSO) and the Generic Names Supporting Organization (GNSO) Councils for ratification.

These IFR and CSC items were presented together for the community to streamline the Fundamental Bylaws Amendment Processes. Both topics relate to how the community oversees ICANN in its performance of the IANA functions. To the extent possible, ICANN will move these items together through the process to avoid duplication of effort.

## Section 2: Submissions

### Organizations and Groups:

| Name                                               | Submitted By                                      | Initials |
|----------------------------------------------------|---------------------------------------------------|----------|
| Customer Standing Committee                        | Bart Boswinkel/Rick Wilhelm                       | CSC      |
| Country Code Names Supporting Organization Council | Alejandra Reynoso, Chair                          | ccNSO    |
| Registries Stakeholder Group                       |                                                   | RySG     |
| At-Large Advisory Committee                        | Policy staff in support of the At-Large community | ALAC     |
| Registrars Stakeholder Group                       | Owen Smigelski, Chair                             | RrSG     |
| Root Server System Advisory Committee              | Jeff Osborn, Chair                                | RSSAC    |

### Individuals:

| Name                   | Affiliation (If Provided) | Initials |
|------------------------|---------------------------|----------|
| Nitin Walia            |                           | NW       |
| Benson King'Ori Mugure |                           | BKM      |
| Preeti Kamra           | ISOC India, Delhi Chapter | PK       |

## Section 3: Summary of Submissions

### **IANA Naming Function Review Cadence**

NW supported the update to better reflect the life cycle of the review. ALAC, the ccNSO, the CSC, the RrSG, the RySG, and RSSAC also supported the update. PK noted support for the update of the periodic review and confirmed that defined thresholds should remain to trigger Special IFRs.

BKM noted the risk of deadlock or delay in an IFR that could result in an indefinite extension of the next review, and recommended a “cap” on the duration of the cadence, suggesting that the Bylaws should include a requirement that the next Periodic IFR should begin at the earlier of either five years from the delivery of the final report, or no more than seven years from the convening of the prior review.

### **CSC Effectiveness Review Cadence**

NW supported the update to “maintain accountability while reducing unnecessary procedural burden.” ALAC, the ccNSO, the CSC, the RrSG, the RySG, and RSSAC all supported the updates. The RrSG noted the availability of a shorter review time if needed. RSSAC reflected that while the initial two-year cadence was appropriate to ensure proper function, the CSC has proven to have reliable functioning that supports a longer time between required reviews.

BKM suggested that five years is too long a period of time and a failure of the CSC should be addressed sooner. BKM proposed an alternate schedule of conducting a performance audit 2.5 years in, or making the cadence four years instead of five. PK noted that while extending the timing of the CSC Effectiveness Review is reasonable, because of the CSC’s role, it should also provide annual self-assessment reports to the ccNSO and GNSO Councils.

### **CSC Charter**

NW supported the updates to the charter, both in allowance of alternates and streamlining of language. ALAC, the ccNSO, the CSC, the RrSG, the RySG, and RSSAC also supported the updates. ALAC highlighted the benefits of formally allowing alternates, including consistency and support of capacity building. RSSAC noted the import of alternates on a committee with such a low number of voting members.

BKM suggested that alternates are “second class” participants with “almost no accountability.” He noted concern with the lack of term limits that might allow them to “accumulate undue influence over time” and noted concern with the lack of attendance rules that could impact their ability to remain informed. BKM suggested including a light attendance requirement and imposing term limits on alternates.

PK noted that the introduction of alternates is an enhancement, and suggested that the charter and Bylaws should also include defined conditions under which alternates assume full member functions as well as transparency requirements. PK also recommends that operational clarity needs to be preserved in the charter.

### **Other Topics**

The CSC and the ccNSO urged ICANN to “take adequate measures to mitigate overlapping scheduling” of future IANA Naming Function Reviews and CSC Effectiveness Reviews and to coordinate scheduling among the ccNSO and RySG as the entities responsible for the CSC Effectiveness Review.

## Section 4: Analysis of Submissions

Of the nine submissions to the proceeding, there was significant support for all proposed updates to the Bylaws as well as to the CSC Charter. Notably, the six ICANN groups that contributed to the proceeding (ALAC, the ccNSO, the CSC, the RrSG, the RySG, and RSSAC) each noted support for all items as posted for Public Comment, without suggestions of further refinement. There were a few areas of concern noted by the individual commenters, including:

- A recommendation for a safeguard of an outer time limit on the number of years between Periodic IFRs, in the event that any individual Periodic IFR hits a deadlock and is unable to perform its duties.
- The development of interim audits of or mandated reporting by the CSC to supplement the extension of the cadence of the CSC Effectiveness Review.
- Suggestions for attendance requirements for alternates, and term limits on alternates to the CSC.

ICANN notes that it is unable to unilaterally insert an outer time limit for Periodic IFRs, as there has been no other discussion within the community about how long IFR teams should have to perform their work and the length of an outer time limit. The two IFR teams to date have been efficient. In the event that a Periodic IFR team fails in the future, the ICANN community still maintains strong oversight over the IANA naming function through the power to initiate a Special IFR. Regarding the development of other interim audits or reporting on the CSC to compensate for the longer length of time allowed between CSC Effectiveness Reviews, neither the ccNSO, the RySG, nor the CSC sought this ability. The new five-year cadence sets an outer limit and an Effectiveness Review can be initiated sooner. Whether more interim reporting is necessary could be a good topic for the next CSC Effectiveness Review, as well as consideration over the participation of alternates and further refinements to their roles or performance expectations.

There were also comments that raised suggestions that certain items were being changed or did not already exist within the proposed updates. For example, one commenter noted that thresholds should remain for the initiation of Special IFRs or other community-initiated reviews, and ICANN confirms that no changes were proposed to any other portion of the IFR Section of the Bylaws (Article 18) that would impact the initiation or cadence of IFRs other than the regular, periodic review as described at Section 18.2. A commenter also noted that the CSC Charter required clarity as to when alternates would assume full participation duties, which is reflected in the proposed charter already (“Upon the vacancy in a member or liaison role, the CSC will recognize the Alternate as the interim member or liaison”).

ICANN notes the caution in potential scheduling overlaps raised by the ccNSO and CSC.

## Section 5: Next Steps

The Summary and Analysis of Public Comment will be presented to the ICANN Board as part of its consideration of whether to approve the Fundamental Bylaws Amendments and the CSC Charter updates. If the Fundamental Bylaws Amendments are approved, the Empowered Community will then begin its consideration of the amendments.