

Public Comment Summary Report

Governance Document for the Recognition, Maintenance, and Derecognition of RIRs

Open for Submissions Date:

Monday, 14 April 2025

Closed for Submissions Date:

Tuesday, 27 May 2025

Summary Report Due Date:

Friday, 06 June 2025

Category: Policy

Requester: Address Supporting Organization (ASO)

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Open Proceeding Link: <https://www.icann.org/en/public-comment/proceeding/governance-document-for-the-recognition-maintenance-and-derecognition-of-rirs-14-04-2025>

Outcome:

The Governance Document for the Recognition, Maintenance, and Derecognition of RIRs was posted for Public Comment from 14 April 2025 to 17 May 2025 and received 17 submissions. The Public Comment proceeding allowed respondents to submit their comments either as an attachment or via a web-based form.

The Address Supporting Organization Address Council (ASO AC) 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

The Number Resource Organization (NRO) is the coordinating mechanism of the Regional Internet Registries (RIRs). The NRO Executive Council (NRO EC) is the representative body of the NRO and comprises a representative from each of the five RIRs. In October 2023, the NRO EC asked the Address Supporting Organization Address Council (ASO AC) to establish and manage a process to update Internet Coordination Policy 2 (ICP-2) with the goal of providing the RIR system with greater accountability to the Internet community. This process is in consultation with the RIRs and their communities.

This Public Comment proceeding is the second consultation on this process. The ASO AC first developed a Proposed ICP-2 Version 2 Principles document (herein referred to as the

“Principles Document”). This document was available for [Public Comment](#) from 8 October 2024 to 6 December 2024 and received 14 submissions.

Following that Public Comment proceeding, the ASO AC developed a draft Governance Document for the Recognition, Maintenance, and Derecognition of RIRs (herein referred to as the “Governance Document”), which was the subject of this Public Comment proceeding.

Section 2: Submissions

Organizations and Groups

Name	Submitted by	Initials
At-Large Advisory Committee	ICANN Staff	ALAC
AWS Security	Paul Vixie	AWS
Caribbean Telecommunications Union	Nigel Cassimire	CTU
Government of Egypt	Manal Ahmed Ismail Abdelmoteleb	GOE
Government of India	Pradeep Verma	GOI
Google	Crystal Ondo	GOOG
Internet Service and Connectivity Providers	Philippe Fouquart	ISPCP
Ministry of Digital Development, Communications and Mass Media of the Russian Federation	Viacheslav Erokhin	RF
Root Server System Advisory Committee	ICANN Staff	RSSAC
Registrar Stakeholder Group	Sarah Wyld	RrSG
Registries Stakeholder Group	Registries Stakeholder Group	RySG
Security and Stability Advisory Committee	ICANN Staff	SSAC
Verisign	Christopher Quesada	VRSN

Individuals

Name	Affiliation (if provided)	Initials
Benson Mugure	STORM Guidance (Mauritius) Limited	BM
Peter Koch		PK
Russell Housley		RH
Waleed Aloriny	Ministry of Communications and Information Technology, Kingdom of Saudi Arabia	WA

Section 3: Summary of Submissions

The proceeding received a total of 17 submissions to this Public Comment proceeding. Thirteen of these stemmed from organizations and four submissions from individuals. Of the submissions from organizations, three were from governments, six from ICANN Advisory Committees or constituencies, three from public companies, and the remaining one was from an intergovernmental telecommunications union.

Section 4: Analysis of Submissions

This section summarizes the responses received.

4.1 Submissions from Organizations and Groups

ALAC generally supported the Governance Document and also offered detailed comments on specific sections.

Section 2.3.c, ALAC recommended introducing a narrowly scoped emergency clause under section 2.3, empowering the ICANN Board to act only as a last resort in the event of critical failure.

Section 2.5, ALAC recommended modifying language to emphasize maintaining a "balanced and justified" number of RIRs instead of categorically keeping the number of RIRs small. Additionally, ALAC voiced concern that some regions were assigned to an RIR without the region's input and made three recommendations to address this historical misalignment:

- Include provisions that acknowledge historical assignments and their potential misalignment with present-day needs.
- Establish a transparent process through which regions may request reassignment to a different RIR or explore the formation of a new RIR.
- Mandate periodic reviews of regional alignments to ensure their continued relevance, fairness, and responsiveness to community needs.

Section 2.6, ALAC recommended encouraging the RIRs to adopt clear, transparent delegation agreements with subregional bodies that include public interest protections and mechanisms for end user input.

Section 2.7, ALAC recommended the RIRs maintain English for official documentation but provide key documents in major regional languages.

Section 4.1, ALAC recommended amending Section 4.1.g to include a requirement for RIRs to engage diverse stakeholders in policy development extending beyond resource holders.

Section 4.1, ALAC recommended clarifying how "effective control" can be legally and operationally defined and demonstrated.

Section 4.2, ALAC recommended establishing a regular cadence for auditing RIRs while also allowing for additional ad hoc audits.

Section 5.2, ALAC recommended requiring that any rehabilitation process under this section include clear deadlines, public status updates, and community consultation. Additionally, ALAC recommended changing the last sentence of this section to, "A non-compliant RIR shall be Derecognized only as a last resort, pursuant to the governance mechanisms laid out in this document."

Section 5.3.a, ALAC recommended evaluating potential successor or interim entities based within the region as the first choice.

Section 6.3, ALAC recommended amending this section to require periodic reviews every 5 to 7 years.

AWS supported the Governance Document. They also commented that the Governance Document provides more clarity on the ongoing obligations of RIRs, the mechanisms for auditing them, and the mechanisms for dealing with noncompliant RIRs. Overall, these enhance the stability of the RIR system and the global Domain Name System. Finally, they encourage ICANN to assume its role as contemplated in the Governance Document after engaging with the RIR community.

CTU generally commented that the Governance Document requires more specificity. CTU recommended adding the following measures to the Governance Document:

- detailed requirements for the contents of an RIR proposal.
- performance metrics and benchmarks to monitor RIRs.
- that RIRs should develop contingency plans for disasters and disruptions.
- that RIRs should form dedicated rapid response teams for emergencies.
- a reference to the Joint RIR Stability Fund.
- that RIRs should engage the Internet community in policy development.
- that RIRs should implement feedback mechanisms to gather input.
- that investments be made in infrastructure to enhance resiliency and security of RIR operations.
- that cyber security investments be strengthened.
- that all deliberations and decisions regarding new or existing RIRs be documented.

CTU also offered detailed comments on specific sections.

Title, CTU commented that *Operational Oversight* or *Operation* may be more appropriate for the title than *Maintenance*.

Sections 2.3.a.i and 2.3.b.i, CTU commented that specifications of a proposal for recognition or derecognition should be included or suitably referenced.

Section 2.4.d, CTU commented that qualifying the requirement for, “good corporate governance procedures” would be useful.

Section 4.1.j, CTU commented that qualifying “timely and accessible” would be useful.

Section 4.1.i, CTU commented that qualifying “continuity and redundancy procedures” would be useful, and that this section could contain a reference to the Joint RIR Stability Fund.

GOE commented that Section 4.1.c does not cover cases in which an RIR may be required to relocate its headquarters. They suggest adding the following sentence to this section, “An RIR can move its headquarters’ location or change its incorporation jurisdiction provided that it remains within its service region.”

GOE commented that Section 5.3 is not clear about how operational continuity will be maintained in the event of derecognition, and that this section should explicitly state how this will be ensured. There may also be a need for pre-approved data escrow services for RIR data.

GOI commented generally that the intent of the Governance Document should be to enable global capacity building by empowering developing and underserved regions. The Governance Document should enable greater participation of marginalized regions and communities, enhance regional technical capacity, and support policies tailored to local development needs.

GOI commented that foundational principles of the multistakeholder model must be embedded throughout the document. GOI recommended that the preamble should acknowledge the role of the ASO AC and the ICANN community and include references that demonstrate inclusive participation and oversight.

GOI also offered detailed comments on specific sections.

Section 1.1, GOI commented that the definitions for *Control* and *Member* should be refined to avoid ambiguity and ensure inclusive representation. The term *Independent Review Mechanism* should be introduced to support due process in the event of disputes concerning recognition or derecognition.

Section 2.1, GOI strongly objected to the overconcentration of decision-making authority in the hands of incumbent RIRs and the NRO Executive Council. GOI recommended that an independent and neutral evaluation body, jointly appointed by ICANN and the ASO, be vested with the authority to assess such proposals.

Section 2.2, GOI suggested that a new metric should be developed to define service regions to reflect the Internet's real world usage patterns and sociocultural contexts.

Section 2.3, GOI expressed strong concern that the recognition and derecognition process is dominated by incumbent RIRs, without meaningful checks, balances, appeals, or transparency. Concerning recognition, GOI suggested that an independent review panel conduct evaluations, with the RIRs restricted to technical advisory input. Concerning derecognition, GOI emphasized the need for a structured appeals mechanism, with access to legal support and recourse to an external review entity.

Section 2.5, GOI commented that the limitation to keep the number of RIRs "small" should be avoided as it may cause impediment to capacity building of developing and underserved regions.

Section 3.1, GOI supported the inclusion of multiple criteria, but recommended additional improvements:

- Evaluator Independence: Evaluations should be carried out by an independent review mechanism appointed by ICANN and the ASO AC, not solely by incumbent RIRs; and
- Broader Metrics: The criteria should include measurable indicators such as Internet user population, technical readiness, linguistic and cultural similarity, administrative capacity, and equitable access.

Section 3.2, GOI suggested adding additional requirements to the post-recognition phase including Transition Planning, Accountability Commitments, and Capacity Support.

Section 4.1, GOI supported this section, but proposed the addition of performance metrics developed through regional consultation that each RIR must submit annually to ICANN.

Section 5.1, GOI commented that this section lacks adequate due process safeguards.

Section 5.2, GOI supported this section, but suggested a binding rehabilitation roadmap, with oversight by ICANN and supported by the community.

Section 5.3, GOI recommended additional protections for end users and number resource holders during transitions.

Section 6.2, GOI supported the clause, but recommended specifying grace periods and periodic compliance checks.

Section 6.3, GOI recommended reducing the review cycle from 10 years to 5 years.

GOOG supported additional governance to the RIR system that clarifies the obligations of RIRs and adds a mechanism for auditing whether those obligations are being met. They suggest greater specificity around:

- which RIR's policies are in effect if derecognition of an RIR is proposed;
- potential timelines of the derecognition process; and
- technical details related to derecognition (e.g., escrowed data formats).

GOOG suggested that tabletop exercises of the proposed derecognition could help uncover potential gaps in the Governance Document.

ISPCP supported the Governance Document.

RF supported the overarching goals of the Governance Document but highlighted two significant deviations of the Governance Document from the Principles Document that they found unacceptable.

- 1) In Section 2.1.b, "All RIRs shall jointly devote best efforts to ensure that all areas are able to continually receive RIR Services." This text deviates from the Principles Document Coverage Principle by adding the formulation "best effort".
- 2) In the definition of Impartiality, RF stated that "neutrality" should not have been replaced with "impartiality", and highlighted that, "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."

RSSAC supported the work on the Governance Document, but had no specific comments on it.

RrSG supported the Governance Document, but noted concerns raised by members of the RIPE community regarding the requirement for unanimous recognition of a Candidate RIR. They suggested a consensus model of decision-making may be better.

RySG supported the Governance Document and offered detailed comments on specific sections.

Section 3.1.a, RySG commented that the process by which a Candidate RIR may propose changing their existing service regions, and how any such proposal would be evaluated, should be clarified.

Section 3.1.b, RySG commented that resource holder support should be a clearly defined threshold of the total number of resource holders in the proposed service region.

Section 3.1.c, RySG commented that the ASO AC should consider how community support can be objectively demonstrated in an application for RIR recognition.

Section 3.1.e, RySG commented that the “Impact” criteria is not clearly written. Therefore, it may benefit from objective assessment criteria, and an objective third-party in its assessment.

Section 3.2.d, RySG commented that the ASO AC should consider how any kind of phased approach to the Effects of Recognition becoming official would impact other RIRs and the Internet Numbers Registry System as a whole.

Section 4.1, RySG strongly supported the establishment of ongoing Operational Requirements for all RIRs. However, many of the criteria are ambiguous, specifically, 4.1.a and 4.1.k. Both should be accompanied by clear, objective, and measurable criteria.

Section 4.2, RySG supported periodic audits and suggests that their cadence be clearly stated to provide predictability, and that ICANN make the findings of any audit available to the public.

Section 5.2, RySG supported the principle that an RIR found to be out of compliance should be given an opportunity to remedy such noncompliance. RySG encourages ICANN to transparently report on any noncompliance and recommended rehabilitation steps the noncompliant RIR is taking, as well as the progress made toward completing those steps.

Section 6.1, RySG commented that following ratification of the Governance Document, ICANN should develop a transparent process for how it will consult with the ICANN community on any future amendments.

SSAC published “[SAC128: SSAC Comments on Draft Governance Document for the Recognition, Maintenance, and Derecognition of RIRs](#)” on 4 June 2025. It was not published in time to be summarized in this report.

VRSN supported the principles articulated in Sections 2.2 and 2.5 of the Governance Document. In addition, they commented that careful consideration must be given to potential impacts on the Resource Public Key Infrastructure (RPKI) system if and when recognition of new RIRs is considered, especially to the “0/0 Trust Anchor” problem.

VRSN suggested adding greater specificity to Article 3 regarding the Recognition of Candidate RIRs, as some of the criteria are worded ambiguously and lack requirements for transparency into how such thresholds are measured and verified. They suggested that Section 3.1, “incorporate a requirement for Candidate RIRs to submit a formal business plan that would demonstrate its financial sustainability, operational readiness, and long-term viability.” They also suggested that Sections 3.1.d and 3.1.e consider adding requirements for qualified third parties to assist in assessing specific criteria for recognition.

VRSN strongly supported Sections 4.1 and 4.2.

VRSN recommended that the Governance Document provide greater detail on the Rehabilitation process referenced in Section 5.1.

4.2 Submissions from Individuals

BM generally supported the Governance Document, “as it provides a significantly more structured, comprehensive, and transparent framework for the recognition, maintenance, and derecognition of Regional Internet Registries compared to the existing ICP-2.” In addition, he complimented it on having clearer definitions and more detailed procedures. However, he recommended adding more references to existing policies, and elaborating on the mechanisms used to determine recognition support from resource holders and the community. He also recommended the Activity Plan discussed in ICP-2 be included explicitly in the Governance Document and not incorporated within the broader Operational Requirements of Article 4.

PK commented that overall, the Governance Document is a significant step forward, but that it needs further discussion. He found it difficult to assess the Governance Document because it does not incorporate or reference the principles from the Principles Document. He also found the Governance Document inconsistent, in that it is overly proscriptive at times, while at other times overly vague. Finally, he found the role of ICANN improperly specified, yet surprisingly and unusually strong for the RIR system, which traditionally is an independent and self-governing subsystem.

RH suggested that substituting the phraseology of “ICANN may not ..”, with “ICANN shall not ..” would make the Governance Document clearer.

WA expressed concern that unanimity among existing RIRs is required to recognize a new RIR. Instead, he recommended revising the requirement to only require a qualified majority.

Section 5: Next Steps

The ASO AC will revise the draft Governance Document based on the feedback from this ICANN Public Comment and the RIR consultations. If approved by the ASO AC, the proposed Governance Document will be presented to ICANN for further consideration. The Governance Document will only go into effect after it is adopted by both the ASO AC and the ICANN Board.