

Public Comment Summary Report

Review of Reviews Draft Report

Open for Submissions Date:

Thursday, 25 June 2026

Closed for Submissions Date:

Tuesday, 04 August 2026

Summary Report Due Date:

Tuesday, 25 August 2026 (extended from Tuesday, 18 August 2026)

Category: Reviews

Requester: ICANN org

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Open Proceeding Link:

<https://www.icann.org/en/public-comment/proceeding/review-of-reviews-draft-report-25-06-2026>

Outcome:

In total, 23 Public Comments (21 comments in this proceeding and two late submissions from the Noncommercial Stakeholder Group (NCSG) and Public Internet Registry (PIR)) were submitted by stakeholders from across the community on the proposals for a refreshed system of reviews from the Review of Reviews Cross Community Group (Reviews CCG), as presented in its Draft Report. The Reviews CCG has begun to consider all input received, to inform its deliberations as it prepares its Second Draft Report which it plans to publish for additional public input.

Section 1: What We Received Input On

The Draft Report represents the conclusion of the third phase of work of the Reviews CCG. The proposed refreshed system of reviews presented in the Draft Report reflects the feedback and perspectives that the group gathered throughout the first three phases of its work. Based on these inputs, the Reviews CCG is proposing a three-pillar framework for ICANN Reviews that includes: Two scheduled reviews (the Accountability and Transparency Review and a Structural Review); On-Demand focused reviews that can be initiated as warranted; and a one-time review related to the Continuous Improvement Program pilot (CIP).

Additionally, the Reviews CCG is recommending the establishment of a Reviews Scoping Committee (RSC) to serve as a central coordination mechanism across the refreshed ICANN Reviews framework. The Reviews CCG also notes that the purpose of reviews is to assess whether ICANN is fulfilling its Mission and complying with its Bylaws, Articles, Commitments, Core Values, and Article 3 transparency obligations ("Transparency Obligations") and, where

needed, to recommend changes and/or improvements to ICANN's processes, procedures, and/or structures to ensure those goals.

The Public Comments received included input on the Reviews CCG's approach as well as on the individual elements of the reviews system and its operational aspects.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
CIIAG, At-Large ALS	Maureen Hilyard	CIIAG
Internet Service Providers and Connectivity Providers Constituency	Philippe Fouquart	ISPCP
.au Domain Administration	Annaliese Williams	auDA
At-Large Advisory Committee	ICANN Policy Staff in support of the At-Large Community	ALAC
ICANN Organization	Russ Weinstein	ICANN
Country Code Names Supporting Organization Council	Alejandra Reynoso	ccNSO
Governmental Advisory Committee	Lars Hoffmann	GAC
Registrar Stakeholder Group	Sarah Wyld	RrSG
Registries Stakeholder Group		RySG
ICANN Board	Wendy Profit	IB
Security and Stability Advisory Committee	SSAC Staff	SSAC
Business Constituency	Business Constituency	BC
Intellectual Property Constituency	Margaret Milam	IPC

Individuals:

Name	Affiliation (if provided)	Initials
Nguyễn Ngọc Duy	Duy Tan University (DTU)	NND
Enoch Singano		ES
Benson King'Ori Mugure		BK'OM
Eduardo Diaz		ED
Alfredo Calderon-Serrano		ACS
Zainab Cheema		ZC
Quynh Nguyen		QN
Laura Ndubi		LN

Section 2a: Late Submissions

At its discretion, ICANN org accepted late submissions, which have been appended to this summary report.

Organizations and Groups:

Name	Submitted by	Initials
Non-Commercial Stakeholder Group	Farzaneh Badii	NCSG
Public Internet Registry	Becky Burr	PIR

Section 3: Summary of Submissions

This section provides a high-level summary of the Public Comments received, organized by theme and related sub-topics. Where feasible, it attempts to highlight any areas of broad support as well as principal concerns raised and points of divergence among commenters. Please note that this summary is intended to provide an overview of the range of inputs received and does not replace or supersede the comments themselves.

Refreshed Reviews System

Many commenters expressed support for the proposed three-pillar framework, with some providing additional suggestions to address concerns such as the need for predictability and clear timelines, including approvals from ICANN's Supporting Organizations and Advisory Committees (SOACs) where these are required. These commenters noted the importance of addressing problems encountered in the current reviews system, such as overlapping or duplicative work, delays, and community workload issues. Commenters also emphasized the need to ensure that accountability mechanisms remain effective, with a few noting the importance of ensuring that a refreshed system of reviews improves, rather than weakens, existing accountability processes.

A few commenters stated that a refreshed reviews system should remain accessible and enable broad participation that is representative of ICANN's global community. Two commenters suggested that further clarification is needed to distinguish between and clarify the respective roles and responsibilities of all participants throughout the review cycle. Several commenters provided input on the thresholds proposed in the Draft Report, including for decision making, with two commenters noting the importance of ensuring that the reviews system does not exclude or diminish the voices of individuals and numerically smaller groups.

Defining the Purpose of Reviews

A number of commenters expressed support for the suggested definition, with several comments raising questions about its proposed scope. While a few commenters agreed that delivery against existing commitments such as ICANN's Mission and Bylaws as well as its Strategic, Operating and Financial Plans can be assessed, one commenter expressed the view that this does not necessarily mean that a review is also the most appropriate mechanism for determining compliance or non-compliance with those commitments.

Distinguishing Between Reviews and Policy Development

Several commenters agreed with the need to distinguish between the reviews process and ICANN policy development work, and supported clearly excluding the latter, which remain within the purview of ICANN's Supporting Organizations, from reviews. However, one commenter argued that reviews can be useful for highlighting any oversight issues with policy development and implementation processes, and questioned the need to restrict reviews to examining only current processes.

Proposal for a Reviews Scoping Committee (RSC)

The Reviews CCG's proposal for a standing committee called the Reviews Scoping Committee (RSC) saw substantial input from a broad variety of commenters.

RSC Role and Governance:

While most contributors support the notion of a centralized coordination mechanism, several commenters expressed concern about the extent of the RSC's role. These commenters noted that the significant responsibilities and authority proposed for the RSC could mean that it will perform more than its intended scoping and process management role. A few also cautioned against the RSC becoming a gatekeeper or an oversight body, with one commenter expressing concern over the possibility of concentrating power in a small leadership body without sufficient accountability.

Several commenters called similarly for greater transparency and accountability around the RSC concept. These comments included a number of suggestions for more specific disclosure and publication requirements as well as more fully developed rules and procedures. Many commenters, including the ICANN Board, highlighted the need for greater clarity around the RSC's governance, such as the roles of the SOACs, the ICANN organization and the ICANN Board, and the RSC's decision-making architecture and methodology.

RSC Composition, Participation, and Assessment:

The proposal for SOAC leaders to form the membership of the RSC saw caution expressed across a number of comments. While at least two commenters supported the proposal, noting that this would leverage existing structures and enable each group to rely on their own internal processes for decision making, several others argued that limiting the RSC's membership in this way risked limiting broader participation, favored organizational group viewpoints over individual assessments, and could result in the RSC becoming a forum for negotiation by stakeholder groups rather than focusing on effective reviews.

There were differing views regarding the appropriate scope of the role that the ICANN Board and ICANN organization should hold in the RSC. While commenters generally recognized a role for the ICANN Board and organization to be part of the RSC, there were differing views regarding the appropriate scope of that role. At least two commenters raised the possibility of recusal from voting in some circumstances, and others mentioned potential concerns over conflicts of interest and the need to align the Board's role as well as those of ICANN's directors and officers with their fiduciary responsibilities under the ICANN Bylaws.

A few contributors expressed concern at the establishment of the RSC as a standing body, with one commenter noting potential drawbacks should the same individuals be responsible for RSC decisions over an extended period of time.

Several Generic Names Supporting Organization (GNSO) groups raised concerns about the proposal to appoint one GNSO representative to the RSC, noting that this may not adequately reflect the diversity of viewpoints within the GNSO.

A few commenters suggested that there should be a periodic review of the RSC, to assess whether its use improves the efficiency of reviews while maintaining accountability and transparency.

Input on Scoping and Methodology

Commenters generally supported the idea to ensure that reviews are adequately scoped prior to committing resources to an effort. However, one commenter disagreed on the basis that scoping should remain a core responsibility of the relevant review team, which is best positioned to develop a scope of work that is both consistent with the ICANN Bylaws and informed by the expertise of its appointed members. Another commenter suggested that each periodic review should retain a mandatory baseline scope grounded in the Bylaws, with the RSC permitted to add topics only where appropriate and consistent with the established framework. A third commenter believed that the RSC should not be able to substantially redefine or alter community-proposed review topics without the agreement of the originating SOAC, while another considered the proposal for multiple rounds of consultation between the RSC, the SOACs, and other stakeholders as cumbersome and inefficient.

Several commenters mentioned the importance of data in developing review recommendations and measuring effectiveness, as well as evidence-based decision making and the development and use of metrics and guidelines to determine success. One commenter proposed that review team findings include intended outcomes so that later assessments can determine whether their implementation produced the expected effect. One commenter suggested that independent experts can also assist with assessing review methodology against established evaluation practice.

Commenters also mentioned the importance of factoring in a periodic assessment to consider whether the refreshed reviews framework is achieving its intended objectives, including through measurable outcomes and other indicators. One commenter mentioned the utility of ICANN establishing a centralized cost-tracking mechanism to assess and manage the cumulative impact of reviews.

Input on Review Team Size, Selection, and Composition

A number of comments included feedback on the size, selection, and composition of a Review Team. Commenters emphasized the importance of inclusiveness and diversity of representation, and the need for effective and balanced participation. One commenter stated that individuals should not serve on both the RSC and the Review Team for the same review except in exceptional, well-justified circumstances, and others recommended a skills and competency-based selection process. Commenters also opined on what they believed to be the appropriate role of ICANN Board and org representatives on Review Teams.

Proposals for Managing Security, Stability and Resiliency (SSR); Registration Directory Services (RDS); and Competition, Consumer Trust, Consumer Choice (CCT) Reviews

A number of commenters provided input regarding the Reviews CCG's proposals about the subject areas for which specific reviews are currently mandatory under the ICANN Bylaws.

On SSR, several SOAC groups stated that a separate SSR review should be preserved, due in part to its importance to ICANN's Mission. However, the Security and Stability Advisory Committee (SSAC), whose role under the Bylaws is to advise the Board and community on matters relating to the security and integrity of the Internet's naming and address allocation systems, stated that it believed the Reviews CCG's approach to be a compromise that ensures SSR issues are considered predictably, visibly, and with community participation.

On RDS, a few commenters stated their belief that RDS should continue to be reviewed regularly. At least two commenters also thought this should be the case for CCT. While there was no clear agreement about the cadence or regularity for these reviews, one commenter suggested that the Reviews CCG's Final Report should explicitly restore a binding, predictable Bylaws commitment for SSR, RDS, and CCT. On the other hand, another contributor proposed a more flexible framework for these three reviews rather than a separate and automatically recurring cadence. One commenter viewed curtailing regular reviews and waiting until an issue arises as problematic, especially for end-user interests.

In contrast to those that supported maintaining these reviews, another commenter noted that CCT and RDS reviews are specific to the generic top-level domain space, with limited relevance to other stakeholders, and as such should not be treated as prerequisites across the broader ICANN ecosystem. Several others questioned the need to create a new Bylaws process to consider if there is a need to review SSR, RDS, and CCT outside a regularly scheduled Accountability and Transparency Review or an On-Demand Review, citing concerns over duplication, redundancy, and resourcing.

Many of the considerations that commenters raised about the Reviews CCG's proposals regarding these specific reviews are highlighted by the input received on the proposed ATR and On-Demand reviews, summarized further below.

Proposal for an Accountability and Transparency Review

There was broad agreement that maintaining a focus on accountability and transparency is important. However, there were divergent views on the Reviews CCG's proposal to incorporate the current Bylaws-mandated Specific Review topics into the ATR, including amongst the SOACs. Those that did not support the idea noted the risk that integrating key topics such as SSR into a single ATR would dilute focus, reduce participation by specialist experts, and limit the depth of analysis and assessment. While the Reviews CCG had also proposed a new On-Demand Review that could address these topics, this additional pathway was not viewed as a clear way to ensure that these topics will continue to receive appropriate attention when needed.

Commenters that supported the proposal, including some SOACs, were in favor of the Reviews CCG's objective to create a more integrated reviews system and reduce unnecessary duplication among reviews. Some supporters also agreed with the proposal to consider prior ATR implementation and the effectiveness of deployed solutions, while recognizing that the new process may require future adjustments based on experience.

Many comments touched on questions such as the timing of and cadence for ATRs, ATR team composition, and the process for deferring an ATR. There were suggestions for improved scoping of an ATR, including an emphasis on timeliness of community processes, and the role of the RSC. A few commenters also mentioned the need for safeguards to ensure that ATRs

remain appropriately focused and proportionate over time, as well as the importance of data and tools for trend analysis and to support implementable findings while ensuring a repeatable scoping cycle.

Proposal for Structural Reviews and a Consequential Effects Review

Comments were received in support of the Reviews CCG's proposal for a dedicated Structural Review, with some supporters calling for more clarity on the intended purpose, scope, and limits of such a review. One commenter noted that a cross-community structural and holistic review has not yet been undertaken, which it considered important to ensure ICANN's structures remain effective, representative, responsive, and fit for purpose. Other commenters suggested further clarifying the process and methodology for a Structural Review, including the expertise required, community participation, expected deliverables, decision points and criteria for progressing between phases, as well as approval requirements.

Comments were also received on the proposed Consequential Effects Review, with suggestions to minimize confusion with its title and terminology, and clarify its purpose and scope. Some commenters also highlighted the importance of ensuring accountability for decisions, including when a decision is made to decline recommendations. There were also comments on the proposed cadence for Structural Reviews, particularly in context of the proposal to handle SSR, RDS and CCT either as part of an ATR or through On-Demand reviews.

Proposal for Deferring Scheduled Reviews

There were several comments that generally supported the RSC's role and process for proposing deferral of a Scheduled Review (i.e., an Accountability and Transparency Review or a Structural Review), with some suggestions for additional improvements, including on the Review CCG's proposal to cap deferrals.

Proposal for On-Demand Reviews

Many commenters also provided input on the Reviews CCG's proposal for On-Demand reviews. There was general support for the framework, with commenters noting that it provided an agile and concrete way to address emerging issues of importance. It was also noted that the combination of Scheduled Reviews and On-Demand reviews has the potential to make the overall review process more efficient and outcome-oriented.

Commenters who expressed concern at relying on On-Demand reviews to address mission-critical issues such as SSR and RDS were of the view that, while the opportunity presented by an On-Demand review could supplement the need for a regularly recurring review, moving a key topic into the On-Demand framework could have the effect of removing a guaranteed standalone review process and thus adversely affecting the predictability of the review cycle. While commenters generally supported the need to reduce duplicative work and the burden on resources, a few expressed the view that efficiency considerations should not override the need to review important issues.

Some commenters highlighted the need to ensure that On-Demand reviews do not become a means to expand the general review framework, while a few others expressly called out the fact that the Reviews CCG's proposal includes the possibility that one or more of the existing Specific Reviews can be initiated as an On-Demand review. These commenters thought that it might therefore be unnecessary and potentially duplicative to add the regular Bylaws prompt

that the Reviews CCG has suggested, for a process to determine on a regular cadence whether there are SSR, RDS, or CCT issues that need to be addressed outside a regularly scheduled ATR.

A few commenters expressed concern at the thresholds that the Reviews CCG has proposed for initiating an On-Demand review. Comments also touched on the importance of data-driven decisions regarding the initiation of an On-Demand review, and the need for safeguards, including to prevent multiple review activities from fragmenting community resources and priorities. In this context, a commenter suggested placing limits on the number of reviews operating concurrently and the number of On-Demand reviews initiated within a defined period.

Proposal for a One-Time Review

The commenters who addressed the proposal to conduct a one-time review of the Continuous Improvement Program (CIP) generally supported it, with some offering suggestions for how the assessment can be conducted. One commenter noted that the findings from this review could be useful input for the internal landscape assessment that constitutes Phase 2 of the proposed Structural Review.

Input on Implementation of Review Recommendations

Several commenters expressed support for the proposal to keep Review Teams active until the ICANN Board takes action on their final reports, though one commenter disagreed. One commenter proposed identifying key implementation assumptions while the review process is ongoing, to support more efficient implementation, and another contributor proposed that the Reviews CCG consider recommending an implementation timeframe.

Commenters also provided positive feedback on the proposal to allow for Public Comments on review outcomes, with one commenter recommending that this requirement be made more explicit in the Reviews CCG's Final Report and another requesting more clarity about what will be published for Public Comment.

Comments were also received on the role and utility of an Implementation Review Team. These were generally supportive, with a few commenters offering suggestions on how these teams can be used effectively.

There was support for enhanced public reporting, including the use of detailed dashboards for tracking progress and reporting on success measures. In addition, a few commenters proposed that the ICANN Board provide regular reports about its decisions regarding review outcomes and engage with the relevant review team prior to rejecting any recommendations from a review.

On the question of prioritization, several commenters made proposals for how this exercise can be conducted and backlogs addressed.

Input on Review Cadence and Timing

Comments were received on the proposed cadence of the Scheduled Reviews. There was disagreement amongst commenters about the proposed 15-year cadence for Structural Reviews. Commenters also agreed on the need to clarify certain timelines and triggers for each review, including the actual start and anticipated end date for a review and for specific phases of

a review. One commenter noted that the proposed framework may not adequately address implementation delays and recommended that there be defined timelines and documented implementation plans to strengthen accountability without redesigning the process.

Other Comments

Funding of Reviews and Support for the RSC and Review Teams:

The ICANN organization commented that funding of Scheduled Reviews should align with ICANN's principles of financial sustainability, with activities and expenses anticipated through approved plans and annual budgets. Funding of On-Demand reviews can be supported through the Project Fund (subject to Board approval) as these reviews may arise at varying intervals.

In relation to resources, the ICANN organization observed that significant dedicated resources will be needed to support the RSC and review teams both before and during periods of activity. It also outlined its expectation that the ICANN organization will lead the work to develop frameworks, templates, and the necessary procedures to support the RSC, with input from the RSC.

Procedural Concerns:

One commenter raised a concern about the lack of a formal Reviews CCG consensus process and limited documentation of how member input was considered.

Reviews concerning the GAC:

The GAC requested that the Final Report preserve its responsibility under Bylaws Section 4.4(b) to provide its own review mechanisms and confirm that the Structural Review, CIP, and On-Demand Review Framework will not expand the GAC's obligations to assess, or be assessed, on its internal structure, operations, or effectiveness.

Section 4: Analysis of Submissions

Overall, the comments received demonstrate broad support for modernizing ICANN's reviews framework as well as the Reviews CCG's concept that combines a set of Scheduled Reviews supplemented by well-scoped, community-supported On-Demand reviews. The comments included many suggestions for refinements to ensure that accountability remains central to ICANN's review processes. Commenters also emphasized their belief that improvements in efficiency must be balanced with maintaining transparency, accountability, community participation, and trust in the multistakeholder model. Some comments noted the need to avoid duplicative or overlapping work, and to ensure that org and community resources are not over-stretched. Other themes across submissions include the need for stronger safeguards around review independence, clearer processes and definitions on roles, responsibilities and decision-making, meaningful representation, and improved implementation tracking.

Section 5: Next Steps

The Reviews CCG has begun to consider all the input received during this Public Comment Proceeding. It plans to engage stakeholders on a Second Draft Report that will take into account the concerns and suggestions raised about the First Draft Report while reflecting the group's continuing deliberations and refinement of its approach and iterative proposals.

NCSG PUBLIC COMMENT

Review of Reviews Draft Report

Submitted by: The Non-Commercial Stakeholder Group (NCSG)

04 August 2026

ICANN public comment proceeding

About NCSG

NCSG represents the interests of non-commercial domain name registrants and end users in formulating Domain Name System policy within the Generic Names Supporting Organization. We are proud to have individual and organizational members in over 160 countries, and as a network of academics, Internet end users and civil society actors, we represent a broad cross-section of the global Internet community. Since our predecessor's inception in 1999, we have facilitated global academic and civil society engagement in support of [ICANN's mission](#), stimulating an informed citizenry and building understanding of relevant DNS policy issues.

Gratitude

NCSG thanks [ICANN org](#), the Review of Reviews Cross Community Group (Reviews CCG) and all contributors to the Review of Reviews draft report for opening this consultation. The [proceeding notice](#) appropriately seeks input on the approach and proposed refreshed reviews system, as a whole Scheduled and On-Demand Reviews., as well as on the individual elements of the reviews system and its operational aspects. In accordance with the [CCG Charter](#), the group has sought to answer the question of "how would we update Specific Reviews" or "ways to make those Specific Reviews more efficient " as listed in the ICANN Bylaws as well in accordance with ICANN Bylaws.

Introduction

Review of Reviews is a critical mechanism to improve a fundamental mechanism of ICANN's accountability and transparency Review process, upon the deferment of the fourth Accountability and Transparency Review process (ATR4) for a limited time to allow for the implementation of the previous ATR3 recommendations in order to minimize the impact on capacity that would be caused by running multiple projects in parallel. The NCSG shared the concerns about the resource intensive nature of every review conducted by ICANN org, and its lack of effectiveness in fixing obvious structural disparity. however it is also vital to ensure that the adjustment or improvement is done within ICANN Bylaws and sufficiently accommodates every aspect of the entire ICANN community equally.

Abstract

This comment supports the idea of review of reviews for more effective use of ICANN org limited resources and the need for improvement to enhance current reviews effectiveness

NCSG Position and Arguments

1. (2.2)The NCSG supports the establishment of the Review Scoping Committee (RSC) as recommended by the CCG review. The NCSG support for the RSC is conditional to its' alignment to ICANN bylaws in the approach they have taken. The NCSG also supports the established focus of the RSC, as a vital coordinating group for future reviews. By serving as a process management body, the RSC addresses historical challenges associated with fixed review cadences by enabling transparent cross-community planning and the rigorous screening of topics against established criteria to prevent the duplication of work. NCSG recommends that the RSC should be a temporary body that issues recommendations about which reviews should be eliminated or shortened, and then goes out of existence. It is however of note that the current mandate of RSC makes it more akin to an oversight body rather than a management process.
2. (2.3)TheNCSG remains concerned that the proposed Review Scoping Committee should reflect balanced representation across Supporting Organizations and Advisory Committees to preserve confidence in the review process. There appears to be limited presence and voice of the NCSG at the various processes of the Review of Reviews process. The major concern for the community is that there is an imbalance in the composition of the panel instituted at the CCG as well as the proposed RSC.
3. NCSG is concerned that the proposed composition of the Reviews Scoping Committee does not adequately reflect the shortcomings of previous review processes. This concern must be understood in light of the longstanding imbalance between commercial and noncommercial representation within ICANN. When NCSG raised the unequal allocation of seats on the Nominating Committee more than a decade ago, the Board advised us to pursue the issue through the relevant review process. We did so, and the review itself recognized the imbalance, yet the composition of the NomCom was never corrected. Nor is this problem confined to the NomCom: whenever questions of equitable representation arise, our commercial counterparts frequently assert that they are structurally entitled to greater representation. Against that background, assigning a single RSC seat to "GNSO leadership" fails to account for the distinct interests and constituencies within the GNSO and risks reproducing existing representational inequalities. The RSC's composition should therefore expressly ensure balanced representation of the GNSO's commercial and noncommercial components, rather than treating the GNSO as a homogeneous body".
4. The NCSG supports an effective review process, especially if it is cost effective and transparent, hence the introduction of the Proposed Refreshed Reviews System, which replaces the existing collection of periodic reviews with a three-pillar framework is a welcome development. NCSG encourages the CCG to ensure that implementation remains fully consistent with the ICANN Bylaws and does not diminish existing accountability mechanisms . A great stress test to find out if refreshed reviews system and RSC work effectively is to see if blatant unequal representation issues such as the ones between CSG and NCSG at Nomcom could be fixed in a timely manner.

5. NCSG has concerns about the lack of clear indicators to make the review of reviews process objective and the review of reviews is intended to audit. The question is “what does success look like?”
6. NCSG also recommends adequate safeguards mechanisms that ensure participation of all concerned communities are engaged actively in the entire review process and adequate transparency about engagements is provided without the RoR having to resort to functioning in good faith.
7. The NCSG recommends that the Review Scoping Committee (RSC) includes fair representation from all Supporting Organizations and Advisory Committees, including the Non-Commercial Stakeholder Group (NCSG). Every stakeholder group should have a meaningful opportunity to contribute to decisions on future reviews. No single stakeholder group should have greater influence than others in deciding which reviews are carried out or how they are planned.
8. The NCSG recommends that the refreshed reviews system is implemented in line with the ICANN Bylaws. Any changes to the review process should continue to protect ICANN's core principles of accountability, transparency and independence. These changes should also ensure that the community continues to play an active role in overseeing ICANN's review process
9. The Draft Report proposes that the Review Scoping Committee evaluate requests for On-Demand Reviews against a defined set of criteria. NCSG supports the introduction of a structured intake process because it can improve consistency and avoid duplicative reviews. However, the Final Report should clarify whether the RSC merely assesses requests against published criteria or exercises discretion over whether a review proceeds. The distinction is important because the RSC should facilitate community accountability, not become a gatekeeper that can effectively prevent legitimate reviews from taking place.
10. NCSG recommends establishing safeguards to ensure that the RSC cannot materially alter community-proposed review topics without the agreement of the originating Supporting Organization(s) and Advisory Committee(s). The scoping process should clarify and organize proposals rather than substantially redefine them.
11. NCSG emphasizes that the refreshed review system should preserve the community's ability to initiate meaningful accountability reviews. The Review Scoping Committee should facilitate community-driven reviews rather than introduce procedural barriers that make it more difficult for the community to exercise its oversight role.
12. NCSG recommends that consensus thresholds should not unintentionally prevent issues raised by smaller or minority stakeholder groups from receiving appropriate consideration. The review framework should ensure that concerns affecting the public interest, equity and fairness are not excluded solely because they lack support from a numerical majority, or because the minority group did not have the resources to turn up at every meeting
13. NCSG recognizes that the RDS, SSR, and CCT Reviews are currently established under the ICANN Bylaws and that implementation of the proposed refreshed review system would require corresponding Bylaws amendments. We do not, however, consider that each of these subjects must continue to be addressed through a separate, automatically recurring review in its current form. Experience has shown that broadly framed Specific

Reviews can become unwieldy, duplicate ongoing work, and create opportunities to reopen contested policy questions outside the appropriate policy-development process. NCSG therefore sees value in a more flexible framework under which the need for, timing of, and scope of a focused review can be assessed in light of actual circumstances.

At the same time, the replacement framework must preserve meaningful accountability for ICANN's implementation of its Bylaws, policies, commitments, and legal obligations in these areas. Incorporating an issue into the ATR, or addressing it through a focused review when justified, may be appropriate provided that the review is clearly and narrowly scoped. No review should be used to circumvent the GNSO policy-development process, relitigate adopted policy, or create new substantive obligations concerning registration-data access, data collection, DNS-abuse mitigation, monitoring, or enforcement.

NCSG therefore does not support a presumption either that standalone RDS, SSR, and CCT Reviews must always occur or that scrutiny of these areas may simply be omitted. The refreshed system should permit proportionate review of implementation, compliance, effectiveness, safeguards, and rights impacts where a demonstrated accountability need exists. Decisions concerning whether and how such matters are reviewed must be transparent, supported by clear criteria, and protected from capture by dominant interests or by the institutions whose conduct may be under examination

14. NCSG supports improving the efficiency of the review system but does not support reducing the strength of ICANN's accountability framework. The refreshed review system should demonstrably maintain or improve the level of independent oversight currently provided by existing Bylaws-mandated reviews.

Penholder: Benjamin Akinmoyeje

NCSG Policy Committee Chair: Farzaneh Badii

NCSG Chair: Rafik Dammak



Public Interest Registry Input on Review of Reviews Cross Community Group

Request for Public Comment on Draft Report

Public Interest Registry (PIR) thanks the Review of Reviews Cross Community Group (CCG) for its important and timely work and is pleased to provide comments on the Review of Reviews Draft Report.

PIR supports the proposed review structure outlined in the Draft Report. It appears to be a comprehensive approach to meaningful review of ICANN's performance that can deliver actionable recommendations for improvement without disproportionately taxing community resources. PIR endorses the comments submitted by the Registry Stakeholder Group (RySG). In particular:

- PIR appreciates the clear statement on the purpose of reviews contained in the Draft Report. By focusing on (1) whether ICANN is delivering against the Mission set out in the ICANN Bylaws (2) whether is it doing so in keeping with its Articles of Incorporation, the Commitments and Core Values set forth in Article 1.2 of the Bylaws, and the Transparency Obligations set forth in Article 3 of the Bylaws, the CCG establishes clear parameters for the ultimate scope of any review, whether they occur in the standard cadence or require urgent out-of-cycle attention via the "On Demand" process. In PIR's view, clarity on this point constitutes a fundamental improvement in the review framework.
- PIR also supports the CCG's proposed creation of a careful scoping exercise managed by a standing Review Scoping Committee (RSC) drawn from and overseen by the elected leadership of the ICANN Supporting Organizations (and, in the case of the GNSO, its constituent parts) and Advisory Committees. PIR believes this approach has several major virtues:
 - First, SO/AC leaders are elected by and accountable to their respective organizations.
 - Second, the RSC management role proposed by the CCG efficiently allows each SO and AC to leverage existing internal decision-making processes in the review context. Where review-specific processes are needed, these can be developed in context. For example, as the RySG notes, because the GNSO is uniquely composed of distinct constituent parts, PIR would expect the GNSO appointee to the RSC to coordinate with the full range of GNSO participants in the SO/AC leadership group, including the elected leadership of constituencies and stakeholder groups.
 - Third, PIR welcomes the proposal to conduct a rigorous scoping process in advance of appointing members of a review team. This will enable review teams to be composed of individuals possessing relevant expertise and skillsets. PIR would support additional detail in the Final Report to ensure that review team members – whether independent or from the ICANN community – are carefully selected based on skills and expertise needed for the specific review topic.
- PIR agrees with the RySG and other members of the community that have cited the critical importance of avoiding colliding reviews that over-tax community resources.
 - PIR understands that the proposed out-of-cycle call outs for specific subsets of ATR reviews to address, for example, stability, security, and resiliency issues is intended to address concerns from some parts of the community that SSR issues could be sidelined. PIR shares the view that the stability, security, and resilience of the DNS is fundamental to ICANN's Mission. That said, because SSR issues are, by definition, squarely within the scope of the ATR review, we are concerned that out-of-cycle call outs (i) undermines the value of having a clearly stated purpose



for reviews; (ii) obscures the centrality of SSR to ICANN's Mission, and (iii) significantly increases the risk of review collision and pile up. For this reason, we do not support out of cycle call outs for specific subsets of ATR reviews, e.g., stability, security, and resiliency, each of which is clearly within the scope of the Accountability and Transparency Review (ATR). We are aware that the CCG is discussing a ["Proposal: Consolidated ATR Scoping Process with Thematic Topic Slates,"](#) which appears to be a better way to ensure that SSR topics are consciously considered and prioritized.

- PIR agrees with the RySG that the description of the On-Demand Framework in Section 3.2.3 would benefit from additional clarity regarding scope and urgency. The On-Demand Review Framework should not be used to expand the scope of reviews beyond the agreed upon purpose of reviews (described above). In addition, any decision to proceed with an On-Demand Review should specifically address the reasons that the issue should not wait until the next relevant regularly scheduled review.

Again, PIR appreciates the hard work of the CCG and the opportunity to provide this input on the Draft Report.

Respectfully submitted on 4 August 2026

Public Interest Registry