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**North American Regional At-Large Organization (NARALO)
Comments on the ICANN North America Engagement Plan 2026-2030**

Introduction

NARALO appreciates and welcomes the opportunity to comment on the Draft North America Engagement Plan 2026-2030. The Public Comment on the [Draft North America Engagement Plan 2026-2030](#) opened on July 10. The NARALO Leadership, led by Greg Shatan, Chair of NARALO, confirmed that it would be in the interest of end users in the NARALO region to submit a regional statement in response to this Public Comment. Judith Hellerstein and Alfredo Calderon volunteered to be the penholders and developed this draft with the input and collaboration of Greg Shatan, Gustavo Ortega, David Mackay, and Denise Hochbaum. The NARALO Statement was shared at the 11 August NARALO meeting. It was then approved on 20 August and submitted.

NARALO welcomes the opportunity to respond to this public comment. Several of our participants collaborated with GSE North America in the drafting and development of this plan, and we were pleased to see it published. However, we had hoped that the finalized plan would include a series of KPIs and metrics to track how the Engagement Plan targets would be met. Unfortunately, GSE did not include any metrics in the Engagement Plan.

Without clear metrics, it will be difficult to determine whether specific strategic goals have been met, which in turn limits the ability to refine or improve strategy over time. Including KPIs not only supports continuous improvement but also helps avoid repeating ineffective approaches.

Strategic Objective 1:

Evolve and promote ICANN's multistakeholder model to sustain its inclusive approach to Internet governance

Strategic Goal 1.1:

Ensure inclusive stakeholder representation and enhance collaboration

These strategic goals had too heavy a focus on the academic community and less focus on the non-profit tech community. NARALO Members believe that there should be a greater emphasis on outreach and engagement within the non-profit and NGO community. Within these communities, we (NARALO) have found good candidates for membership within At Large and the NCSG, as well as other groups. In the past, NARALO has worked closely with the National Digital Inclusion Alliance and has also reached out to NTEN, two ICT-focused nonprofits. It would be great to conduct outreach efforts with more NGOs in the North American region.

A clear plan for academic engagement between ICANN and universities would be quite useful, but we did not see one in the Engagement Plan. NARALO thinks that this type of planning is crucial to establishing effective dialogue between ICANN and these parties. In this context, a clear and strategic program should be developed and directed to the academic schools and departments actively engaged in research on internet governance, cybersecurity, and emerging digital technologies. This program should formally invite collaboration, highlighting the mutual benefits of integrating ICANN's approach into the academic setting. Once these departments open their organizations and spaces for engagement, ICANN's team should leverage their laboratories, research centers, and relevant disciplines to foster a dynamic exchange of ideas, promote recognized academic and policy projects, and strengthen the global dialogue on multistakeholder internet governance.

NARALO also believes that GSE should foster a closer focus and connection between the outreach that GSE is doing with universities and other groups and existing NARALO ALSes and individual members in the vicinity. This could include inviting them to events to showcase the breadth and depth of At Large and ICANN. This close engagement could include engaging ALSes in coordinating with university activities where members could talk to faculty and students about fundamental aspects of: 1) How the Internet works, 2) the role of ICANN, and 3) how individuals can get involved (ICANN Learn, NextGen & Fellowship Programs, At Large, etc.). An effective engagement strategy would use all available tools to increase engagement. Too often, NARALO ALSes hear about GSE outreach efforts after they occur. To strengthen the proposed plan, NARALO suggests that better coordination between GSE and local NARALO members and/or leaders should occur *before* university outreach begins. This would allow NARALO members and GSE to work together on joint programs and

other activities, ensuring local expertise is leveraged and engagements are more strategic and effective.

Other types of activities could include “ICANN on the Road”, with people from NARALO, NCSG, and other stakeholders represented to showcase the breadth and depth of ICANN.

Additionally, it would be great to reach out to more underserved or marginalized groups, such as less obvious educational institutions, persons with disabilities, indigenous communities, and others.

Strategic Goal 1.2:

Enhance the agility and effectiveness of policy and advice development

While NARALO supports this effort, effective policy and advice development needs to be inclusive of persons with disabilities. More needs to be done to raise awareness within ICANN to ensure that all communications are effective and well-implemented, and that reports, communication materials, and other products are made accessible for persons with disabilities. Currently, that is not the case. Moreover, within ICANN, only At Large and the GAC have language interpretation, and only these two groups have human captioning. We could get more people from Puerto Rico and Quebec, as well as other Francophone or Spanish-speaking communities, to join one of the North American communities within ICANN if we offered language support (interpretation and RTT in Spanish and French) in other ICANN groups besides At Large. Furthermore, we suggest that the registration form be revised to gauge the need for language support or other accessibility needs. This would allow participants to add their needed language, such as Spanish, French, or sign languages, among others.

Strategic Goal 1.3:

Expand strategic alliances to support the multistakeholder model of Internet governance

Here again, there should be increased outreach to other civil society groups, the private sector, and governments to increase awareness of, and the possible benefits of alliances for all parties.

Strategic Objective 2:

Collaborate with regional stakeholders to evolve the Internet’s unique identifier systems

Strategic Objective 2 and its related goals are generally well-articulated and aligned with ICANN’s mission to support the evolution and inclusivity of the Internet’s unique identifier

systems. However, their impact and clarity could be enhanced through measurable targets, inclusive of diverse stakeholders, and a stronger focus on capacity building and regional sustainability.

Strategic Goal 2.1:

This goal focuses on raising awareness of the New gTLD Program and the Applicant Support Program (ASP) by emphasizing outreach in targeted markets. This objective integrates both in-person and virtual events, enhancing accessibility and engagement across diverse regions. Additionally, it promotes collaboration between ICANN org and regional stakeholders, ensuring coordinated efforts and broader dissemination of information about these critical initiatives.

NARALO understands this, which is why we had expected a more defined plan on Capacity Building and Follow-Up. Although raising awareness is an essential first step, fostering sustained engagement should include ongoing education and capacity-building efforts, since these can ensure that individuals and organizations — particularly those from underserved or underrepresented communities — can meaningfully participate in the New gTLD Program. Structured support to demystify technical, administrative, and financial requirements, build local expertise, and increase equitable participation beyond initial outreach across the entire region is needed to ensure sustained participation beyond initial outreach.

NARALO believes that in the next five years, ICANN's capacity building efforts cannot overlook the transformative role of emerging technologies — particularly Artificial Intelligence (AI). AI is not only reshaping how networks operate but also how global communities collaborate to ensure the security, stability, and resiliency of the Internet. Within the ICANN ecosystem, AI should be understood both as a tool that can enhance technical operations (such as monitoring DNS abuse, detecting threats, or optimizing policy analysis) and as a governance challenge that requires careful, inclusive, and transparent engagement.

The integration of AI into ICANN's multistakeholder model should go beyond technical deployment. AI governance is fundamentally about accountability, transparency, ethics, and inclusion. This aligns with ICANN's long-standing principles of openness, trust, and shared responsibility. By embedding AI into its decision-making and operational frameworks, ICANN can serve as a global example of how multi-sector collaboration can responsibly govern disruptive technologies. Before integrating AI into operations, we suggest that ICANN's plan ensures that the use of AI directly benefits and protects end-users. AI tools used to combat DNS abuse or threats must be transparent and accountable to ensure trust. Moreover, the discussion on AI governance should not be left to technical experts only. Instead, the plan should create clear and accessible pathways for individual users to participate and have a real voice in shaping the ethical rules that will govern these powerful technologies.

A structured capacity-building program should be developed for North America that equips stakeholders with the knowledge and tools to address AI's impact on Internet governance.

By embedding AI governance capacity building into ICANN's North American strategy, the community will not only address immediate security needs but also ensure that ICANN remains relevant and resilient in the face of technological evolution.

NARALO believes that the best way to enhance the inclusiveness and long-term impact of the engagement strategy would be to broaden stakeholder participation beyond technology and communications organizations.

NARALO believes that the current goals could benefit from incorporating more diverse voices, particularly from academia and civil society, focusing on universities, civil society groups, and youth organizations that have a vested interest in Internet governance and digital inclusion. We feel that this approach would foster a richer, more representative dialogue and contribute to more equitable outcomes.

NARALO suggests that GSE should integrate knowledge transfer mechanisms into the process to better ensure the sustainability of the initiatives and foster local ownership. We suggest that GSE or ICANN develop a series of train-the-trainer programs along with the creation of regional resource kits that empower local champions to lead continuous awareness campaigns. These steps not only promote continuity but also strengthen capacity at the community level, making long-term program success more attainable.

Strategic Goal 2.2:

Facilitate Universal Acceptance (UA):

This goal emphasizes the promotion of Universal Acceptance (UA) across the region, ensuring that all valid domain names and email addresses — regardless of language, script, or character length — are recognized and supported equally by all internet-enabled systems.

To achieve this, GSE should encourage strong collaboration between the ICANN community and the broader technology sector, fostering partnerships that can help overcome technical and linguistic barriers. The goal underscores the importance of embracing language diversity by supporting translation efforts and localized outreach, ensuring that UA messages resonate with stakeholders across linguistic and cultural contexts.

NARALO believes that although the objective to Target Underserved and Underrepresented Communities is articulated in neutral language, it lacks an explicit emphasis on equity and inclusion. While the intent to engage marginalized populations is present, it does not

acknowledge that many stakeholders — such as those in Indigenous, rural, linguistically diverse communities, or persons with disabilities — may not have the necessary resources, access, or awareness to participate meaningfully without deliberate and sustained outreach. To enhance the inclusivity and impact of this goal, it is recommended to include a specific sub-goal or action step that states: “Prioritize outreach to Persons with Disabilities and to Indigenous, rural, and linguistically diverse communities in North America.” This would demonstrate a concrete commitment to equity and help ensure that engagement efforts are both representative and responsive to the needs of historically excluded groups.

To enhance the effectiveness of the strategic goals, it is essential to incorporate the SMART criteria, ensuring objectives are Specific, Measurable, Achievable, Relevant, and Time-Bound. Currently, neither of the goals includes concrete metrics or clear success indicators. For instance, it is unclear how many awareness events are planned annually, what benchmarks will define “raising awareness” (e.g., attendee numbers, survey feedback, or post-event actions), or how the impact will be evaluated over time.

To address this gap, NARALO recommends integrating Key Performance Indicators (KPIs) into the goals. A practical example would be: “Conduct five awareness events in underserved markets by Q4 2026, with a minimum participation of 100 stakeholders per event, and track post-event engagement through participant surveys and follow-up outreach.” This approach not only clarifies expectations and timelines but also allows for accountability and continuous improvement aligned with ICANN’s regional engagement objectives.

Strategic Objective 3:

Strengthen the stability and security of the Internet’s unique identifier systems

Strategic Goal 3.1

NARALO believes that it is essential to broaden the scope of stakeholders involved in reinforcing the stability and security of the Internet’s unique identifier systems. Currently, partnerships are largely limited to technical entities such as ICANN’s OCTO team and regional technology organizations. To ensure a more inclusive and resilient engagement strategy, partnerships should be extended to include academia, civil society groups, and technical education institutions, particularly those serving underserved or Indigenous communities. Additionally, active collaboration with Internet exchange points (IXPs), local network operators, and municipal technology leaders can enhance localized Internet resilience. For example, ICANN could establish collaboration agreements with universities, civil society organizations, and local technical communities to co-develop resilience plans for DNS and Internet infrastructure.

Beyond raising awareness, the goal should also prioritize actionable capacity building. This includes offering hands-on workshops, simulation exercises, and joint incident response training, as well as promoting train-the-trainer models to foster regional expertise in areas such as DNSSEC, routing security (RPKI), and Universal Acceptance (UA) readiness. A concrete action step could involve launching regional technical fellowships or community labs to provide practical, sustained learning opportunities.

Moreover, the goal would benefit from including measurable outcomes to assess progress and accountability. Metrics such as the number of stakeholders trained, the frequency and geographic reach of hybrid events, and the number of formal cross-sector collaboration agreements (MOUs) could help GSE achieve its goal. A potential key performance indicator (KPI) could be the delivery of eight hybrid workshops annually, with at least 30% participation from new stakeholder groups, complemented by follow-up surveys to measure impact.

Strategic communication channels and continuity mechanisms should be reinforced. While virtual engagement is valuable, long-term impact requires systems for knowledge retention and community-building. This could be achieved through the creation of a regional technical engagement portal or mailing list that offers multilingual resources, FAQs, and case studies to support ongoing learning and inclusivity. Such improvements would significantly enhance the effectiveness and inclusivity of ICANN's technical engagement efforts in North America.

Strategic Goal 3.2

ICANN's Draft North America Engagement Plan seeks to “strengthen the DNS Root Server Systems” by engaging the broader community in discussions about its technical and governance evolution. While the goal is valid and aligned with ICANN's mission, NARALO believes that the proposed engagement areas are too vague and lack detail in several crucial areas.

NARALO suggests that the engagement plan would benefit from greater clarity and precision by better defining its target audience. Currently, the term “broader community” lacks specificity, making it difficult to design tailored outreach strategies. It is recommended to segment the audience into groups such as network operators, ISPs, academic institutions, civil society actors, Indigenous technical communities, and municipal technology leaders. This segmentation will allow for more effective, context-sensitive engagement formats. Furthermore, the plan lacks a listing of concrete engagement activities. To enhance its impact, NARALO believes that ICANN could incorporate specific initiatives such as quarterly webinars, tabletop exercises, and interactive simulations focused on the operation, evolution, and resilience planning of the Root Server System (RSS). These activities should be explicitly designed for diverse stakeholder groups.

Another significant omission is the absence of performance metrics, success criteria, or defined learning outcomes. The inclusion of SMART indicators—such as hosting six regional technical dialogues with at least 200 participants and publishing post-event summaries capturing feedback and governance concerns—would provide measurable benchmarks for progress. Additionally, the plan does not address the inclusion of underrepresented or underserved communities. Ensuring multilingual resources and organizing localized sessions for Indigenous, rural, and linguistically diverse populations would significantly advance inclusivity in RSS dialogues.

The plan also does not reference the existing Root Server Operators (RSOs) or propose mechanisms for engaging them in public education efforts. Collaborating with RSOs and the Root Server System Advisory Committee (RSSAC) to produce accessible briefings and guides on RSS evolution, tailored to non-expert audiences, would bridge this gap.

Finally, we believe a link to ICANN's ongoing governance reform initiatives, such as those being undertaken by the RSS Governance Working Group (RSS GWG), should be added. We feel that adding this link would ensure better alignment with the work being done by the RSS WG and other such groups. This would enable ICANN to facilitate regional consultations on proposed governance reforms and channel community insights directly into the RSS GWG's deliberative processes.

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