

Functional Model for Root Server System Governance

NCSG Comments

September 22, 2025

About NCSG

NCSG represents the interests of non-commercial domain name registrants and end-users in formulating the Domain Name System policy within the Generic Names Supporting Organisation (GNSO). 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, etc, 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 their understanding of relevant DNS policy issues.

About this Public Comment

<https://www.icann.org/en/public-comment/proceeding/functional-model-for-root-server-system-governance-11-08-2025>

Our Comment

a. Insufficient role for non-commercial and end-user interests

While the document acknowledges "Other Stakeholder Communities" and allows them to participate through public comments, it excludes them from direct decision-making in the Council (reserved only for RSOs, ccTLDs, and gTLDs). Given that the DNS Root

Server System is a global public good, civil society, academia, technical community representatives, and end-user advocates should have structural participation, not just observer/commenting rights.

→ *Comment:* The Governance Structure should include a pathway for non-commercial stakeholders and end-user groups to have meaningful, formal participation (e.g., reserved seats, independent liaison, or rotating observer status with voting rights in defined areas). This would strengthen inclusivity, accountability, and balance against capture by operational or commercial interests.

b. Transparency and public-interest safeguards

The transparency provisions in the appendices (publication of minutes, performance data, and financial reports) are commendable. However, there is no independent accountability mechanism for the public interest, such as independent ombuds or public review panels. Without this, civil society has limited recourse if decisions compromise openness or neutrality.

→ *Comment:* The final model should embed independent accountability mechanisms accessible to non-commercial stakeholders (e.g., annual community review processes, ombuds-like oversight, or public interest impact assessments of major policy changes).

c. Financial neutrality and capture risks

The report highlights funding risks, including dependence on voluntary contributions and possible capture by dominant funders. While it proposes transparency and donor limits, it does not go far enough to ring-fence the Governance Structure from undue financial influence. If a small set of contributors can shape governance priorities, the RSS's neutrality is at risk.

→ *Comment:* We recommend that the Governance Structure adopt strict safeguards on funding sources, such as:

- A cap on contributions from any single entity.
- Exploration of sustainable public-interest aligned funding, such as broad-based contributions from domain registration revenue, rather than ad-hoc donor reliance.
- An independent committee with members from civil society, academia and research, or NGOs and only one board member as liaison

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