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AT-LARGE ADVISORY COMMITTEE
Functional Model for Root Server System Governance

Preamble

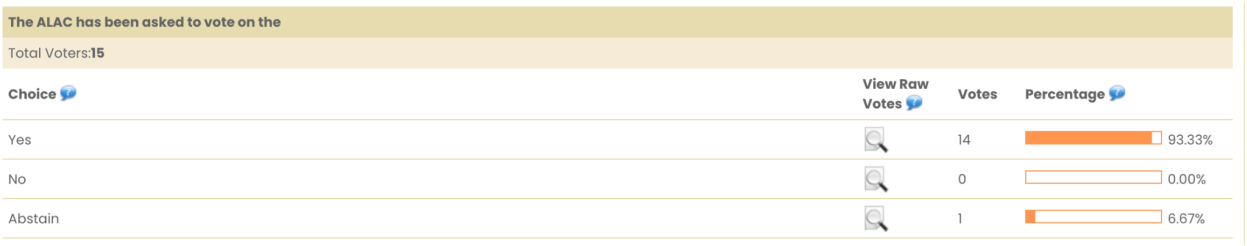
On 11 August 2025, the Public Comment proceeding opened for the Functional Model for Root Server System Governance. An At-Large workspace was created in preparation for this Public Comment submission. The At-Large Operations, Finance and Budget working group (OFB -WG) reviewed the public comment and decided it would be in the interest of end users to develop and submit an ALAC Public Comment Statement.

Ratification Record

On 11 August, the Public Comment proceeding opened for the Functional Model for Root Server System Governance. On 28 August, Bukola Oronti, Eunice Perez Coello, Hervé Hounzandji, Joel Okomoli and Vanda Scartezini discussed the comments for the ALAC statement during the OFB- WG call. The At-Large OFB working group- (OFB WG) decided it would be in the interest of end users to develop and submit an ALAC statement for this Public Comment proceeding. Bukola Oronti, Eunice Perez Coello, Hervé Hounzandji, Joel Okomoli and Vanda Scartezini volunteered to draft the initial ALAC statement for OFB-WG consideration and ALAC endorsement.

On 4 September, the initial draft statement was shared with the OFB WG for review and input. On 17 September, the At-Large Public Comment Statement was finalized. The ALAC Chair, Jonathan Zuck, requested that the Public Comment Statement be ratified by the ALAC before submission to the ICANN Public Comment feature.

On 22 September, staff confirmed the online vote resulted in the ALAC endorsing the statement with 14 out of 15 votes in favor. 0 votes against, and 1 abstention. Please note 100 % of ALAC members participated in the poll. The ALAC members who participated in the poll are Aziz Hilali, Bukola Oronti, Claire Craig, Eunice Alejandra Perez Coello, Emilia Zalewska-Czajczynska, Jonathan Zuck, Judith Hellerstein, Justine Chew, Kathleen Scoggin, Lilian Ivette De Luque, Natalie Tercova, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu, Shah Zahidur Rahman. You may view the results here:



The ALAC has been asked to vote on the

Total Voters:**15**

Choice	View Raw Votes	Votes	Percentage
Yes		14	93.33%
No		0	0.00%
Abstain		1	6.67%

ALAC and At-Large Community Comments

1. Council Composition and End-User Representation

The proposed model establishes that the Council will be composed of Root Server Operators (RSOs), representatives of gTLD and ccTLD registries, and technical liaisons from IETF, IANA, and the RZM. This composition provides a strong technical and operational foundation; however, it may limit the diversity of perspectives in decision-making if end users do not have a more direct role.

Because the root zone is a critical public resource that underpins the security and stability of the Internet; governance of such a model needs to reflect as well the interest of the global Internet Community. To reflect the global public interest, governance must include voices beyond the operational and technical community. End user participation balances operational efficiency with the Internet's role as a global, open and shared resource. Such an omission of end users could affect the Council´s legitimacy and reduce community trust in its decision-making process.

Such limitations become evident when looking at regional conditions: while regions such as Europe or North America benefit from multiple root instances and therefore lower latency and higher redundancy, other regions with fewer instances experience greater vulnerability. Likewise, if a security incident disrupts digital public services, the current model would treat it only as a technical failure without reflecting the real-life impact on millions of users. Without user-focused metrics, these disparities remain invisible and risk undermining global equity in the functioning of the RSS.

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The ALAC/At-Large believes that the credibility of the governance model would be strengthened by introducing mechanisms that more directly integrate the end-user voice. This could be

achieved by recognizing end users as a Participant Stakeholder Community with representation on the Council. If full representation is not granted, then other alternatives such as a liaison role could be considered.

Furthermore, the ALAC/At-Large recommends establishing metrics of representativeness, such as tracking the incorporation of feedback from public consultations or measuring the extent to which Council decisions reflect contributions from different groups. These indicators should be consolidated and published in a publicly accessible dashboard, ensuring that inclusivity is measurable, transparent, and comparable across regions.

2. Appeals Mechanisms and User Access

The model includes appeal mechanisms in functions such as Designation and Removal (DNR) and Security Incident Reporting (SIR). However, these processes are designed primarily for technical actors and do not provide end users with the ability to trigger or participate in them. This limitation creates an institutional gap that reduces responsiveness and may give the impression that disruptions affecting service continuity lack a clear path for resolution.

For example, if a security incident disrupts public digital services (such as education, healthcare, or government procedures), the current model would report it merely as a technical failure, without giving affected users the ability to activate a review or demand corrective action.

The ALAC/At-Large considers it necessary to broaden the scope of these mechanisms to include channels accessible to end users, either directly or through an intermediary body. It also recommends incorporating effectiveness metrics, such as the number of appeals submitted, resolution times, and the percentage of cases successfully addressed. Publishing these indicators on a regular basis would strengthen transparency, accountability, and community trust in the RSS decision-making model.

3. Performance Monitoring and Evaluation (PME)

The PME function focuses on technical metrics such as latency, availability, and compliance with standards. While these parameters are essential for operational stability, they are limited if not complemented with a broader approach. Assessing only technical indicators may overlook how different regions and communities experience service quality, which could undermine trust in the fairness of the system.

This limitation is evident in the uneven distribution of root instances, which results in differences in latency and redundancy across regions. Furthermore, the absence of social metrics prevents these resilience gaps from being visible, reinforcing inequalities in the user experience. Without expanding the scope of monitoring, such disparities remain unaddressed and continue to weaken the perception of fairness across regions.

The ALAC/At-Large considers that the model should be expanded to include social and regional impact metrics alongside technical ones. These could include regional performance comparisons, tracking outages from the user's perspective, and reporting on equitable distribution of resilience. With such an approach, monitoring would not only confirm technical stability but also reinforce public trust in the management of the RSS as a global infrastructure.

The ALAC/At-Large further recommends the publication of a public dashboard with user-centric KPIs—such as effective latency, percentage of queries served locally, time-to-recovery during incidents, and outage prevalence across regions—to ensure that inclusivity and equity are measurable, transparent, and comparable worldwide. Such a dashboard would make visible the gaps that are currently hidden when only technical indicators are reported, directly addressing the concern of missing social and regional metrics.

4. Financial Risks and Potential Capture

The proposed financial model relies on voluntary contributions and sponsorships. It also carries the risk of over-reliance on a small number of donors. Such concentration could raise concerns about independence and neutrality, and should be addressed through safeguards that ensure transparency and broad trust in the system. Without appropriate measures, such concentration could affect the neutrality and independence of the system. It is not only important to avoid situations of actual capture, but also to mitigate perceptions of undue influence, which may erode the model's legitimacy.

The ALAC/At-Large considers it essential that the funding framework include clear mechanisms to guarantee independence and avoid risks of capture or undue influence. A well-designed model should incorporate diversification of sources and regular external audits.

5. Transparency and Reporting

The model foresees transparency measures such as the publication of technical metrics, financial audits, and performance reports. While valuable, these may fall short if they do not show how decisions affect different groups, particularly end users. Transparency must cover not only operational and financial management but also the social consequences of decisions.

The ALAC/At-Large suggests incorporating regular end-user impact reports, complementing technical and financial indicators, to demonstrate whether RSS governance fulfils its mission of ensuring stability, equity, and reliable access. In addition, these reports should include clear, verifiable metrics on participation, regional equity, and user experience, so that transparency reflects not only formal compliance but also the broader legitimacy and trust in the model.

The ALAC/At-Large also stresses that the perception of capture is as significant as actual circumstances, and transparency must address both: what objectively takes place and what the community perceives, in order to safeguard trust in the system.

End-User Impact

The ALAC/At-Large notes that the inclusion of end user representation as suggested above projects inclusivity and accountability in the decision-making model. The lack of accessible appeals mechanisms further widens this gap, as it leaves unaddressed the problems arising from failures or security incidents that directly affect those who rely on the Internet in their daily lives.

Likewise, the absence of user-focused metrics in performance monitoring makes it difficult to assess how resilience is distributed across different regions and communities, which may perpetuate digital inequalities. Added to this is the reliance on a small number of funders which, without adequate safeguards, could lead to perceptions of undue influence. Finally, the omission of social impact reporting limits transparency, reducing the ability of the global community to confirm that the RSS functions as a genuine public infrastructure.

Taken together, these limitations affect the confidence of end users not because of the system's technical capacity, but because there are no clear and measurable elements showing that their perspectives are taken into account. Introducing verifiable metrics of inclusivity, accessibility, and equity, alongside financial safeguards and regular social impact reporting, is essential to sustain the credibility of the model and ensure it continues to serve as a global public good.

Finally, the ALAC would like to commend the GWG for its report and the effort invested. We see this as a positive and constructive first step toward developing an effective governance model for the RSS.