

22 September 2025

RrSG Comments on: [Functional Model for Root Server System Governance](#)

The Registrar Stakeholder Group (RrSG) appreciates the opportunity to comment on the Functional Model developed by the Root Server System (RSS) Governance Working Group (GWG) in response to Root Server System Advisory Committee advice.

The RrSG supports the proposed governance model for the Root Server System as an important step toward transparency and technical stability. The focus on a Council, core technical functions, and financial safeguards is the right direction. While not a direct customer, the RSS is the foundation on which the DNS exists and on which our registrar businesses rely. We agree with the principles outlined in the governance model and note our specific focus on ensuring that any governance model protects against political or single-party influence.

With this in mind, the RrSG makes the following recommendations to consider either in establishing an organizational design or once the model is fleshed out and operationalized:

1. Define and publish clear voting rules that require broad support for major decisions, across different voting groups.
2. The relationship between the proposed Governance Structure, ICANN, and IANA should be defined earlier in the process (currently it is listed as the final Milestone in the Establishment Phase). Understanding how this Governance Structure would impact the overall structure of ICANN is a threshold question that the ICANN Community should understand before more detailed work is undertaken.
3. Support the independence of technical decisions from ICANN's policy bodies and offer a clear path on whether the governance structure will remain within ICANN or move to a separate entity.
4. Ensure funding rules prevent any single government or organization from gaining outsized influence.
5. Ensure the process for adding or removing root server operators is strictly technical, transparent, and includes an appeal path.
6. Consider creating a standing or ad-hoc non-voting forum so registrars and other stakeholders can give input for consideration as needed.
7. Define clear confidentiality rules for how security incident reports are shared.

Attention to these areas would help ensure the system remains technically sound, accountable, and free from capture.

Again, the RrSG thanks the Root Server System (RSS) Governance Working Group for their efforts in drafting this Functional Model.

Sincerely,

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Registrar Stakeholder Group Chair