

Feedback and Recommendations
from the
Caribbean Telecommunications Union
on the

**Governance Document for the Recognition, Maintenance, and Derecognition
of Regional Internet Registries**

("RIR Governance Document") 14 April 2025 (DRAFT)

Date: 27th May 2025

Introduction

The Caribbean Telecommunications Union (CTU) appreciates this opportunity to provide comments on the [draft RIR Governance Document for the Recognition, Maintenance, and Derecognition of Regional Internet Registries \(“RIR Governance Document”\)](#) dated 14 April 2025. The CTU notes that this document is intended to outline the rules and criteria for recognizing, overseeing and derecognising Regional Internet Registries (RIRs), and our comments are aimed at enhancing the clarity and utility of the document for stakeholders of the Internet Numbers Registry System to foster more efficient, reliable technical operations in the best interest of Internet users.

General Comments

The CTU recognizes that transparent and efficient management of IP numbering is essential for the continued growth and stability of the internet. The RIR Governance Document should therefore provide clear policies in order to foster robust oversight. There are multiple instances in the draft document where the text can be enhanced by the inclusion of, or reference to, specific performance or operational standards to qualify a generically stated requirement. More precisely qualified requirements would encourage consistent results and minimize ambiguity and disputes.

The CTU supports the central role proposed for the existing RIRs to lead the evaluation process for establishment or dissolution of a RIR. These organizations possess the operational expertise, regional insight, and community trust necessary to make informed decisions. The document should also explicitly respect the autonomy of regional communities in alignment with the bottom-up governance model of the Internet.

Notwithstanding the above, specific thresholds or conditions under which ICANN may intervene should be defined. For example, if after a given period of consultation time (six to twelve months?) the RIRs cannot reach agreement, ICANN may initiate a mediation process before making a final decision.

Finally, the words “Operational Oversight” or “Operation” may be a more appropriate replacement for the word “Maintenance” in the document title.



Additional Recommendations for Inclusion in the RIR Governance Document

Given that this RIR Governance Document is intended to be more comprehensive than its predecessor and in light of the above comment about enhancing clarity by inclusion of performance or operational standards, the following measures can be considered to further enhance governance of and by the RIRs.

1. *Enhanced Governance Standards and Practices:*

- a. RIR Proposal Requirements: Mention is made of submission of a proposal by a Candidate RIR however no specifications are given regarding what such proposal is required to contain/include. The requirements or a relevant reference thereto should be included at the appropriate place(s) in the document.
- b. Performance metrics: Establish clear performance metrics and benchmarks for RIRs to monitor their efficiency and effectiveness.

2. *Crisis Management Protocols:*

- a. Contingency Plans: RIRs should develop comprehensive contingency plans for various types of disruptions, including technical failures, cyber-attacks, and geopolitical issues;
- b. Rapid Response Teams: Form dedicated rapid response teams within each RIR to address emergencies swiftly and effectively.
- c. Joint RIR Stability Fund: Identification of this fund, established by the Number Resource Organization (NRO) in 2015, as a critical safeguard designed to ensure the continuous operation of the internet IP address management system globally. This fund provides financial support to Regional Internet Registries (RIRs) facing severe disruptions, such as natural disasters, military conflicts, or financial distress, thereby maintaining stability in the issuance of IP numbering.

3. *Stakeholder Engagement:*

- a. Community Involvement: RIRs should engage the internet community in the governance process, ensuring that stakeholders have a voice in the decision-making;

- b. Feedback Mechanisms: RIRs should implement robust feedback mechanisms to gather input from users and stakeholders on RIR performance and policies.

4. *Technological Upgrades:*

- a. Infrastructure Investment: Invest in advanced technological infrastructure to enhance the resilience and security of RIR operations;
- b. Cybersecurity Measures: Strengthen cybersecurity measures to protect against threats and ensure the integrity of the IP numbering system.

5. *Transparency and Documentation*

All deliberations and decisions by the RIRs regarding new or existing RIRs should be documented and made publicly available. ICANN's role, if invoked, should also be transparent and accountable to the global internet community.

By incorporating these additional measures, the comprehensiveness of the RIR Governance document would be enhanced over all phases of recognition, maintenance/operation and derecognition. This would contribute to further strengthening the stability and reliability of the IP numbering issuing process and ensuring that the RIRs can effectively manage internet resources even in challenging circumstances.

Specific Referenced Comments

Page/Section Reference	Comment
Page 1, Title	The words “Operational Oversight” or “Operation” may be a more appropriate replacement for the word “Maintenance”.
Page 3, Section 2.3(a)(i)	Specifications of the required contents of the Proposal should be included or suitably referenced. For example, ICP-2 outlines specific requirements for the proposal of a new RIR. However, the proposed governance document does not adequately incorporate all these foundational prerequisites.
Page 4, Section 2.3(b)(i)	Specifications of the required contents of the Proposal should be included or suitably referenced.

Page 7, Section 4.1(d)	Specifications or suitable reference(s) should be included to qualify the requirement for “good corporate governance procedures”
Page 7, Section 4.1(j)	A specific qualification or reference for “timely and accessible” would be useful e.g., at least annually, according to NRO standards etc.
Page 7, Section 4.1(l)	Specifications or suitable reference(s) for the required standard of “continuity and redundancy procedures” are recommended here. In addition, mention may be made of any requirement to contribute to the Joint RIR Stability Fund.

Conclusion

The CTU respectfully submits that while the proposed governance document is a positive step towards formalising enhanced RIR oversight, it requires greater specificity to be truly effective. We strongly urge that the above recommendations be incorporated to ensure that the RIR framework remains robust, equitable and fit for purpose in a rapidly evolving global Internet ecosystem.