

**Comments by the Government of Egypt on the
Governance Document for the
Recognition, Maintenance, and Derecognition of RIRs
21 May 2025**

The Government of Egypt (GoE) welcomes the opportunity to provide comments on the proposed Governance Document for the Recognition, Maintenance, and Derecognition of Regional Internet Registries (RIRs) – “the RIR Governance Document”, intended to update ICP-2.

The GoE appreciates NRO/ASO efforts in compiling this proposed draft, taking into consideration comments expressed by the community during the consultation process, and would like to submit the following comments on the draft:

1. Change in Incorporation or Headquarters

Article 4.1 (c):

The draft does not cover a situation where an RIR headquarters needs to move. The draft states that “*An RIR must be incorporated and maintain its headquarters within its Service Region.*”, which suggests that an RIR may change the location of its headquarters or its incorporation jurisdiction as long as it remains within its service region. We believe this should be explicitly mentioned along the following lines:

“An RIR must be incorporated and maintain its headquarters within its Service Region. An RIR can move its headquarters’ location or change its incorporation jurisdiction provided that it remains within its service region.”

2. Service Continuity during Derecognition

Article 5.3:

- It is not clear how smooth transfer of services and operations of the Derecognized RIR would be ensured, in case of a conflict.
- It is important to explicitly state that the RIR services and operations within the affected region will be sustained without disruption throughout the Derecognition process.
- Per Article 4.1 (I), there may be need to consider pre-approved RIR Escrow services, to be used during Derecognition.