

Comments by the Russian Federation on the «Governance Document for the Recognition, Maintenance, and Derecognition of RIRs»

The Russian Federation welcomes the opportunity to provide feedback on the proposed “Governance Document for the Recognition, Maintenance, and Derecognition of Regional Internet Registries (“RIR Governance Document”)”.

The Russian Federation has already contributed to public comments for document «Proposed Internet Coordination Policy 2 (ICP-2) Version 2 Principles» and we would like to express our comments on the new document.

While the Russian Federation supports the overarching goals of the ICP-2, we would like to highlight several serious concerns. Unfortunately, the “RIR Governance Document” has changed the wording of a number of important provisions.

1) Document “ICP-2 Version 2 Principles” Article “RIR Ecosystem” contained the following provision:

“Coverage: All RIRs shall jointly ensure that all areas on the globe continually receive RIR services”.

The “RIR Governance Document” has a different text in p.2.1 (b)

“All RIRs shall jointly devote best efforts to ensure that all areas are able to continually receive RIR Services”.

In our opinion, the “best efforts” formulation is unacceptable. This is just a declaration that does not bind RIRs to fulfill its role and this provision implies different interpretations. It is unclear for Russian Federation at what stage and by whom this wording was changed. It should be noted that there were no proposals in the report “Public Comment Summary

Report Proposed Internet Coordination Policy 2 (ICP-2) Version 2 Principles” to change the text, at the same time AGAC, ALAC, and APRALO commented that it is important for the RIRs to work together to maintain continuity of operations and global coverage.

2) The second important comment the Russian Federation would like to make on the principle of “Neutrality”. Document “ICP-2 Version 2 Principles” Article “Operation” contained the following provision:

“Neutrality: An RIR must operate and apply its policies in a manner that is neutral and consistent.”

In the document “RIR Governance Document” this principle has changed **“Impartiality: An RIR must operate and apply its policies in a manner that is impartial and consistent.”**

As in the previous case, we do not understand the meaning of changes in text and abandoning the principle of “Neutrality”. We believe it is correct to retain the original formulation of this principle. Internet governance is an open democratic process based on generally recognized principles of international law, and should not be limited by any unilateral political restrictions or commercial interests. **The activities of RIRs should not be conditioned by any unilateral political sanctions and policy - making, and should not lead to discrimination on territorial, national, religious or other grounds.**

In this regard, we propose to retain the principle of “Neutrality” in its original formulation.