

Tucows public comment: ICANN Office of Ombuds Framework and Process

10 February 2026

Tucows welcomes the opportunity to comment on the [ICANN Office of Ombuds Framework and Process](#) ("Framework") and appreciates the ICANN Ombuds' work in preparing and drafting this revised Framework.

Tucows Domains is the largest wholesale domain registration services provider in the world; based in Canada and with offices globally, we are a staunch supporter of the free and open Internet. Tucows participates in policy development at ICANN and in other venues, advocating for a data protection by design and by default approach to Internet policy and working to ensure that our customers' and Internet users' concerns are considered. The Tucows Family of Registrars includes Enom, LLC (IANA 48), Tucows Domains, Inc. (IANA 69), EPAG Domainservices GmbH (IANA 85), and Ascio Technologies, Inc. (IANA 106).

Tucows broadly supports the draft Framework. **An empowered ombudsperson is necessary for a welcoming Community and Meetings where everyone is safe from harassment and unfair treatment and has a predictable and accessible path for recourse.**

Definition of "ICANN Community"

We note with concern the exclusion of ICANN Staff from "the Community" of people who can approach the Ombudsperson for support with a conflict or complaint. ICANN Staff may have *additional* ICANN-internal safeguards or processes available to use for an intra-Staff conflict but in cases where the source of conflict is a Community member rather than another ICANN employee there is currently no recourse for the employee. **ICANN Staff should be allowed to use the process that all other members of the ICANN Community have access to in order to resolve issues that arise as a result of their participation in the Community.**

Tucows hopes that ICANN Org is in the process of reviewing and revising their internal policies so that the protection of the ICANN Ombudsperson is not necessary but even so, the Framework should not remove the protection of the ICANN Ombudsperson from an essential class of ICANN Community Members.

Contradictions regarding remit

Page 5 of the Framework indicates that the Ombudsperson has jurisdiction over "Decisions, actions, or inactions by a member/members of ICANN staff" but page 11 contradicts this,

indicating that the Ombudsperson does *not* have remit over “Behavior or conduct of a staff member”. While there may be an overlap of jurisdiction between the Ombudsperson and various internal ICANN corporate policies, the Ombudsperson should have the same amount of jurisdiction over ICANN Staff as they have over any other member of the ICANN Community, including disallowing someone to participate in ICANN Meetings or other activities.

Timeframes

Tucows generally supports the timeframes set out in the Framework. Determining whether the matter is in scope, agreeing on the process to be followed, and beginning the work is currently allotted 25 working days (approximately 5 weeks); this may prove to be longer than is needed or is beneficial to those affected by the situation at hand. **Tucows suggests reevaluating this period after a year of active Ombudsperson work to determine how it can be shortened.**

We note that the aspirational timeframe of completing investigations within 60-90 days may not be possible given that formal requests for information can be responded to also in 90 days.

Conclusion

Tucows supports the Framework overall and agrees that the publication of this Framework is an important step towards ensuring that everyone is safe from harassment and unfair treatment and has a predictable and accessible path for recourse.

Recent litigation against ICANN has clearly shown that ICANN’s internal processes are not sufficient to protect ICANN Staff in the way that the ICANN Ombudsperson should protect all members of the ICANN Community. ICANN Staff are in a more vulnerable position than other members of the Community and should rightly have more protection—not just the current corporate policies of ICANN Org but also the protection of the ICANN Office of the Ombudsperson.

Tucows again thanks the ICANN Ombudsperson for their work on this important Framework and looks forward to its implementation.

Thank you,

Sarah Wyld

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