

## **RrSG Response to Pilot Holistic Draft Terms of Reference**

The Registrar Stakeholder Group (RrSG) welcomes the opportunity to provide feedback regarding the [Pilot Holistic Review Draft Terms of Reference](#). The RrSG would like to thank ICANN org staff for their considerable work involved in preparing these draft terms of reference.

The RrSG is concerned that the proposed Draft Terms of Reference for the Pilot Holistic Review leaves too many open questions and varied interpretations to allow for proceeding with the Pilot as proposed. The RrSG feels that more work should be done to resolve the currently-identified open issues before launching the Pilot Holistic Review.

The goal of a pilot program should be to test a proposed work plan to confirm it is sufficient to meet the goals of the program - not to resolve already identified information gaps and resolve ambiguities about scope. These issues are more appropriately resolved prior to launching a pilot program.

The RrSG's primary concern regarding the Draft Terms of Reference for the Pilot Holistic Review is the expectation that the Pilot Holistic Review will address the numerous "information gaps" highlighted by the ICANN Board, in addition to conducting the Pilot Holistic Review itself. Without resolution on these "information gaps," it is difficult to fully evaluate the deliverables and timeframes of the Draft Terms of Reference. Furthermore, it seems counterintuitive to request participants for the Pilot Holistic Review before determining the necessary skill sets for Holistic Review Team members.

The RrSG suggests initiating a Cross Community Working Group, or similar mechanism, to first address the structure of the Pilot and future Holistic Reviews to address the Board identified "information gaps." The RrSG believes this preliminary step will allow the Pilot Holistic Review to work more effectively and efficiently. Only after resolving the open issues on the scope and approach for such a Pilot, should the Pilot Holistic Review actually be initiated.

Additionally, the RrSG reviewed the [ccNSO](#) and the [RySG](#) public comments, the RrSG shares their concerns and supports their proposals, without needing to repeat them here.

Sincerely,

Ashley Heineman  
Chair, RrSG