

The ICANN GNSO “Business Constituency”



ICANN Business Constituency (BC) Comment on [Review of Reviews Draft Report](#) 4-Aug-2026

Background

This document is the response of the ICANN Business Constituency (BC), from the perspective of business users and registrants, as defined in our Charter. The mission of the BC is to ensure that ICANN policy positions are consistent with the development of an Internet that:

1. Promotes end-user confidence because it is a safe place to conduct business;
2. Is competitive in the supply of registry and registrar and related services; and
3. Is technically stable, secure and reliable.

General Comment:

The BC has previously expressed support for a comprehensive Structural Review of ICANN's governance framework. We note that a cross-community structural and holistic review has not yet been undertaken, despite its importance in ensuring that ICANN's structures remain effective, representative, responsive to evolving needs, and fit for purpose. The BC therefore encourages ICANN to initiate such a review at the earliest appropriate opportunity.

While the Continuous Improvement Program (CIP) supports ongoing improvements within individual Supporting Organizations and Advisory Committees, the BC considers that the objectives of a Structural Review are broader, encompassing ICANN's overall governance framework, institutional effectiveness, and cross-community interactions. The BC therefore views these mechanisms as complementary and does not consider the existence of the CIP to diminish the need for a comprehensive Structural Review.

Proposed Refreshed Reviews System

The Refreshed Reviews System proposed in the draft retains the Accountability and Transparency Review (ATR) as a scheduled review but proposes to incorporate other Bylaws-mandated reviews under Section 4.6, including the Security, Stability, and Resiliency of the DNS (SSR) Review and the Registration Directory Service (RDS) Review, within the ATR framework. The draft further proposes that the ATR continue on a regular five-year cycle, while

reviews such as the SSR and RDS would be conducted on demand or through periodic calls for interest.

The BC has significant concerns regarding this proposed approach and believes the Draft Report would benefit from further justification and clarification. In particular, the BC is not persuaded that the Draft Report sufficiently demonstrates how the proposed restructuring of the Specific Reviews is supported by the current ICANN Bylaws. Nor does the Draft Report provide a sufficiently clear policy rationale or explanation of how the expanded scope of the Accountability and Transparency Review (ATR) would effectively encompass the distinct objectives of the SSR and RDS Reviews.

In particular, the BC recommends retaining a scheduled mechanism for independently reviewing the security, stability, and resiliency of the DNS. The SSR Review serves a distinct role within ICANN's accountability framework, including oversight of matters relating to DNS security, stability, resilience, and DNS abuse, and should remain a separate review rather than be incorporated within the ATR.

We also suggest that any decision for deferral of the SSR should require broad community support, including agreement from at least five Supporting Organizations and Advisory Committees (SOs/ACs), consistent with the significance of the review and its role in safeguarding the security and stability of the DNS.

Review Scoping Committee

The BC raised the following concerns regarding a standing committee for scoping in our [2018 Comment on Proposed Operating Standards for ICANN's Specific Reviews](#) and [2025 comment on Proposed Updates to the Operating Standards for Specific Reviews](#).

“ICANN’s Bylaws Section 4.6 already describes the scope for each of the Specific Reviews. Once assembled, the Specific Review Team should define the scope of the present review consistent with the Bylaws. Separating the scoping responsibilities from the designated review team would result in a cumbersome process, given that the actual review team will need to keep revisiting the thinking behind the scope drafting team’s recommendations.

The Scope Drafting team is an unwelcome and unnecessary complication. Moreover, this would give the Board new powers to reject the scope established by the Scope Drafting Team.

To be clear, the BC considers scoping to be a core responsibility of the Specific Review Team. To the extent the Board believes that the scope is not consistent with the Bylaws, the Board can request further review and/or clarification from the Specific Review Team. In that event, however, the AC/SO leaders have authority to determine whether the review team is acting consistent with the ICANN bylaws, and can thereupon authorize the review to proceed.”

We remain of the view that these principles apply to the RoR CCG's proposed Review Scoping Committee (RSC).

The BC notes that the proposed Review Scoping Committee (RSC) would assume responsibilities that extend well beyond review scoping. Its responsibilities include developing review charters, assessing the feasibility of review timelines and resource requirements, identifying support thresholds, and overseeing decisions regarding review deferrals. Collectively, these functions represent a significant expansion of the committee's role.

We are also concerned that the RSC is proposed as a Standing Committee. A permanent body may not be well suited to address the unique circumstances, priorities, and subject matter of individual reviews, each of which should be evaluated on its own merits by the appointed review team.

We acknowledge that the broader ICANN community is consulted at several stages of the proposed scoping process. However, we believe that introducing multiple rounds of consultation between the RSC, the community, and other stakeholders would make the process more cumbersome and less efficient. These scoping activities can and should be carried out by the review team itself, which is best positioned to develop a scope that is both consistent with the ICANN Bylaws and informed by the expertise of its appointed members.

Conclusion

The BC appreciates the considerable effort of the Review of Reviews Cross-Community Group in developing a refreshed framework for ICANN reviews and supports the objective of improving the effectiveness, efficiency, and sustainability of the review system. At the same time, the BC considers it essential that any reforms remain consistent with the ICANN Bylaws, preserve the distinct purposes of Bylaws-mandated reviews, and maintain meaningful community oversight throughout the review process. The BC therefore encourages further refinement of the proposed framework to ensure that it strengthens ICANN's accountability, transparency, and institutional effectiveness while remaining responsive to the evolving needs of the multistakeholder community.

This comment was prepared by the ICANN Business Constituency (BC) and approved in accordance with our [Charter](#).