

ICANN Organization Comment on the Draft Review of Reviews CCG Report

The Internet Corporation for Assigned Names and Numbers organization (ICANN org) appreciates the significant time and effort that the Review of Reviews Cross-Community Group (Reviews CCG) has invested in developing the Draft Report. ICANN org recognizes the extensive work required to complete this effort within a demanding timeline and welcomes the opportunity to contribute to its continued refinement.

Context and Objectives

In its May 2025 resolution, the ICANN Board directed the community to develop a shared understanding of the areas and issues for which reviews could enhance ICANN's accountability, transparency, and effectiveness. The Board also noted a shared concern that the overlapping and converging review cycle was no longer sustainable and might not achieve the desired results.

In September 2025, the Board adopted the Review of Reviews Charter, developed through collaboration among the Supporting Organizations and Advisory Committees (SO/ACs). The Charter tasked the Reviews CCG with conducting a fundamental evaluation of reviews as a system, including implementation, and proposing a refreshed review framework.

The Charter further states that the Reviews CCG's outputs should include recommendations on the purpose, need, scope, and frequency of future reviews. The refreshed system should also support effective and efficient reviews and implementation of Board-adopted recommendations, while inspiring trust.

ICANN org offers the following observations and operational considerations in support of those objectives.

Need for Greater Clarity of Roles and Responsibilities of SOACs, Board & ICANN Org

The Draft Report identifies several roles for ICANN org throughout the proposed review cycle. These may include logistical and subject-matter support, participation during scoping and review activities, support for Board deliberations, and management of implementation following Board action.

The Final Report would benefit from greater clarity about the roles and responsibilities of all participants, including the SO/ACs, the Board, and ICANN org. This clarity is particularly important during scoping, the submission of topics for On-Demand Reviews, and decisions to initiate or defer a review. Roles may differ depending on the stakeholder, process, or decision involved.

ICANN org recommends that the Final Report distinguish among these roles and explain the rationale for assigning them.

There may also be circumstances in which ICANN org, or another participant, should recuse itself from a particular discussion or activity. Because ICANN org supports the community and implements Board-approved recommendations, it should generally not participate in consensus calls or votes concerning the initiation, conduct, or outcome of a review. As noted in ICANN org's comments on the Refined Proposal Outline, the framework should permit any participant to recuse itself when appropriate.

Need to Further Define Governance & Role of Reviews Scoping Committee

ICANN org agrees that establishing a central forum for review-related activities through the proposed Reviews Scoping Committee (RSC) could improve coordination across the review system.

1. Governance & Role

The Final Report should further define the RSC's governance model and authority. In particular, it should distinguish between matters on which the RSC may make recommendations and those on which it may make determinations. Clear governance will promote transparency, reduce duplication, and support efficient decision-making.

The Draft Report assigns the RSC responsibilities relating to resources and prioritization. The Final Report should more clearly distinguish the respective roles of the RSC, the Board, and ICANN org in each area of RSC activity.

Section 2.2 states that the RSC would be responsible for the "effective management and coordination of resources associated with the review process." This responsibility requires further definition. For example:

- To what extent would the RSC manage or coordinate community volunteers?
- How would the RSC's role interact with ICANN org's responsibility for staffing and operational support?
- How would the RSC's activities account for the fiduciary obligations of ICANN's directors and officers regarding financial and organizational resources?

2. Decision Making

ICANN org also recommends further examination of the proposal to refer certain matters back to the SO/ACs when those groups are already represented on the RSC. The Final Report should explain why such a referral would be useful and how it would help resolve an issue on which the RSC could not reach agreement.

3. Resource Support

Supporting the RSC is likely to require significant dedicated resources before and during periods of activity. Based on the support provided to existing community structures, ICANN org anticipates that at least three staff members may be needed to provide substantive, administrative, and operational support. Resource needs will vary, but periods in which RSC activities and multiple reviews occur at the same time will require additional capacity. Further comments regarding funding support for reviews follow below, in the Section titled "Funding of Scheduled Reviews".

4. Org support to RSC

As part of its secretariat function, ICANN org expects that it would lead the development of frameworks, templates, and procedures with input from the RSC. This work may require independent evaluation expertise to ensure consistency with established practice. Clarifying this responsibility in the Final Report would confirm cross-community support for ICANN org's role in developing the operational procedures needed to support the RSC.

More Explicit Distinction between Reviews and Policy Development

ICANN org strongly supports a clear distinction between reviews and the policy development processes established in the ICANN Bylaws.

Reviews should assess whether mechanisms and activities within their defined scope:

- remain relevant to their intended purposes;
- are implemented efficiently; and
- achieve their intended outcomes.

Where findings concern a policy development process, a review should focus on how the process is supported, conducted, or implemented. It should not revisit the substance of policy decisions, which remains the responsibility of the community bodies designated in the Bylaws.

Making this distinction explicit would respect the roles and prerogatives of the policy development bodies. It would also reduce duplication and avoid unintentionally reopening settled policy matters.

The Reviews CCG should consider safeguards, particularly during scoping and topic definition, to prevent a review from being used to revisit or displace decisions that properly belong within a policy development process.

Simplifying & Further Defining the Scoping Process

The scoping process should include controls to ensure that review topics can be assessed using data and evidence and are capable of producing supportable findings.

A scoping framework could define when a proposed topic is ready for review. At a minimum, the topic should:

- be specific enough to test against evidence;
- identify the question or issue to be evaluated;
- be capable of producing findings; and
- include a short, documented rationale explaining why it was accepted, deferred, or rejected.

These requirements would make scoping more transparent and repeatable across review cycles.

The Reviews CCG should also consider whether the proposed scoping process can be simplified. Greater reliance on the cross-community representation already present within the RSC may improve timeliness and reduce demands on community and organizational resources.

Design Proposal for Accountability and Transparency Review

The proposed scope of the Accountability and Transparency Review could encompass a broad range of topics. In addition to the RSC's role in scoping, the Final Report should identify tools for keeping the scale of each ATR manageable, particularly when several topic areas are selected.

The refreshed framework also presents an opportunity to build longitudinal comparability into the ATR. Under the current system, each review is scoped largely through a new community process. This limits the ability to identify trends in ICANN's accountability, transparency, and effectiveness over time.

Because longitudinal comparability is difficult to introduce after a framework is operational, ICANN org recommends addressing it during the design of the refreshed framework.

One option would be a hybrid model. Each ATR could include:

1. a stable core of recurring evaluation questions or indicators, assessed consistently from cycle to cycle; and
2. additional topics selected by the community and vetted through the RSC.

The Reviews CCG could define the principles and priorities that the recurring indicators should address. An independent evaluation expert could then develop a proposed indicator set based on those principles and established evaluation practice. The Reviews CCG could review and refine the proposed indicators before the framework is finalized.

This approach would preserve flexibility while allowing ICANN to observe trends over time. It would also support the Board's May 2025 direction that reviews enhance accountability, transparency, and effectiveness.

A recurring core could further streamline scoping because that portion of each review would not need to be renegotiated. It may also help keep the overall scale of an ATR manageable when community-selected topics span several areas.

Greater Clarity for Structural Review

The Final Report should more clearly define the purpose and process of the Structural Review. Additional detail is needed on:

- the objectives of each phase;
- the methods to be used;
- the expertise required;

- expected deliverables;
- milestones and decision points;
- criteria for progressing from one phase to the next; and
- any formal approval or sign-off required between phases.

Clarity around transition points between phases and the associated governance of the Structural Review is essential.

The first phase includes a landscape assessment. The Draft Report suggests that an external landscape assessment could be incorporated into the strategic planning cycle and used to inform the Structural Review. Because ICANN's Annual Strategy Review Program already includes an assessment of external trends, the Reviews CCG should consider how these activities differ from the current exercise and how they could be integrated to reduce duplication.

Independent expertise and external perspective could also be useful during phases two and three. External review at those stages could help identify methodological, operational, or governance concerns before recommendations are adopted and structural changes begin.

ICANN org also recommends renaming the Consequential Effects Review described in phase three. A distinct name would avoid confusion with the On-Demand Consequential Effects Review described in section 3.2.4.

Safeguards for On-Demand Reviews

On-Demand Reviews could provide a useful complement to scheduled reviews. However, the framework should include safeguards to prevent multiple review activities from fragmenting community resources or interfering with other core responsibilities.

In anticipating how the proposed system works as a whole, ICANN org continues to believe the Reviews CCG should consider:

- a limit on the number of reviews that may operate concurrently;
- a limit on the number of On-Demand Reviews that may be initiated within a defined period; and

These safeguards would support meaningful participation, improve resource planning, and reduce the risk of review fatigue.

Funding of Scheduled Reviews

ICANN operates according to principles of financial sustainability. Activities and expenses must be anticipated in approved plans, and annual expenses must remain within available funding. Planning must account for scheduled reviews, including the Accountability and Transparency Review (ATR) and Structural Review, as well as On-Demand Reviews and ongoing support for the RSC.

ICANN org expects that ongoing support for scheduled reviews, including the ATR and Structural Review, would be treated as an operating expense in the annual budget.

These expenses would include staff support, review-team expenses, and other costs incurred in conducting the reviews. They would be addressed through the annual operating plan and budget and remain subject to ICANN org's disbursement policies.

The annual operating plan and budget is also subject to public comment, Board adoption, and the Empowered Community process.

Overall the predictable cycle of ATR's and Structural Review should allow for proper budgeting in the existing planning process. The Org does recognize the potential for deferrals, or specific scoping could drive variances from plan, but overall the predictability this aspect of the proposal provides is welcome.

Funding of On-Demand Reviews

Because On-Demand Reviews may arise at varying intervals, ICANN org anticipates that they could be supported through the Project Fund.

The Board established the Project Fund in May 2026. It includes funding for Board-approved community recommendations previously supported through the Supplemental Fund for Implementation of Community Recommendations, as well as other multiyear projects.

Allocations from the Project Fund require Board approval. Use of the fund must therefore be planned sufficiently in advance and monitored carefully. Any allocation for an On-Demand Review would remain subject to Board approval and would be included in ICANN's financial reporting.

Redundancy Regarding Topics Previously Addressed Through Specific Reviews

The Board stated in May 2026 that reviews should not duplicate existing mechanisms.

Based on section 3.2.2.1 of the Draft Report and the presentation during the 14 July 2026 webinars, ICANN org understands that topics previously addressed through Specific Reviews, including Security, Stability, and Resiliency and Registration Directory Services, could be considered through either the scheduled ATR or an On-Demand Review, provided the required level of support is reached.

The Reviews CCG should consider whether an additional periodic prompt to review them is necessary when two other review pathways would already be available. Without a clear rationale, the additional prompt may introduce redundancy.

Methodology for Developing Recommendations

Review recommendations should be supported by findings. Each recommendation should also identify its intended outcome so that later assessments can determine whether implementation produced the expected effect.

Review teams should consider reduction and replacement on equal footing with addition. Recommendations should not default to creating new commitments without considering whether existing work could be stopped, reduced, consolidated, or performed more efficiently.

This approach could help control the cumulative cost and complexity of implementation over time.

The Reviews CCG should also consider validating the proposed review methodology against established evaluation practice, with support from an independent evaluation design expert.

Implementation Considerations

The Draft Report proposes that each Community Review Team remain active while the Board considers its recommendations. ICANN org understands that this is intended to allow timely clarification and support alignment among the review team's recommendations, the Board's direction, and implementation planning.

Key assumptions about implementation should be identified transparently during the review. Each recommendation should therefore include:

- a brief statement of its intended outcome;
- the basis for concluding that the recommendation will support that outcome; and
- an indication of how progress or achievement could be observed.

This information would support more efficient implementation. It would also allow subsequent reporting to address both completion and effectiveness.

Funding and Prioritization of Implementation

Prioritization remains essential to managing the needs and demands of ICANN's global community.

The Planning Prioritization Process forms part of ICANN's annual operating planning process. It allows the community to provide input on the order in which Board-adopted community recommendations should be implemented.

As the Board adopts policy and non-policy recommendations, implementation must be planned and budgeted alongside other priorities. ICANN org recommends that recommendations arising from reviews remain subject to this prioritization process.

Measures of Success for the Refreshed Framework

The Final Report should define measurable criteria for determining whether the refreshed review framework is achieving its intended objectives.

These criteria could include a practical set of indicators addressing matters such as timeliness, cost, participation, implementation, effectiveness, and the extent to which reviews produce useful and actionable results.

The Final Report should also identify when and how the community, Board, and ICANN org will assess the operation of the refreshed framework. That assessment should determine whether the framework has delivered the intended improvements and whether further adjustments are needed.

Conclusion

ICANN org appreciates the opportunity to comment on this important work and thanks the Reviews CCG for considering these observations.

The Final Report should also explain the benefits of the proposed framework as a whole. In particular, it should describe how the proposed elements work together to improve, simplify, or otherwise advance the review system compared with the current model.

ICANN org values the collaborative engagement throughout this process and looks forward to continuing to support the development of an effective, efficient, and trusted review framework.