

RrSG DRAFT Public Comment: [Review of Reviews Draft Report](#)

4 August 2026

The Registrar Stakeholder Group (“RrSG”) appreciates the opportunity to provide a comment on the [Review of Reviews Draft Report](#) and the Review of Reviews Cross Community Group (CCG)'s work on drafting this Report. This is a significant undertaking and the RrSG appreciates the dedication of the CCG over the course of their work, and especially thanks the CCG for the outreach sessions they held as well as for joining RrSG meetings to provide information upon request.

The Registrar Stakeholder Group is the representative body of ICANN-accredited domain name registrars. Operating with numerous subgroups focused on specific topics of interest, the RrSG contributes to policy development, issue advocacy, and negotiations with ICANN. We work to advance the interests of registrars and our customers by promoting data-driven policy outcomes. Learn more about the RrSG on our website rrsg.org.

General Comments

Overall the RrSG is **satisfied with the three-part ongoing review structure and the additional one-time review of the Continuous Improvement Program**. The RrSG agrees that the purpose of the reviews outlined in the Report is appropriate, and that the revised review structure should result in achieving that goal. Further, we welcome the establishment of a Reviews Scoping Committee and support their scope and areas of responsibility.

As the review framework includes several moving pieces, it is hard to be certain whether they will all come together as anticipated, but we do support the attempt. The built-in **deferral process should also help ensure that review timing can be adjusted where necessary so as to minimize overlaps and potential conflicts**. The RrSG notes the historic ongoing difficulty presented by reviews stacking up against each other or overlapping; the proposed changes should address this concern and bring order and rationality to the frequency and timing of reviews, which the RrSG eagerly anticipates and strongly supports.

The requirement to go to Public Comment seems to apply only to the development of review topic shortlists and not to the actual Review Reports which are submitted to the ICANN Board of Directors. **Are we correct in understanding that the proposed review structure does not anticipate Public Comments for the Review Reports? If that is the case, what is the rationale for this decision?**

Accountability and Transparency Review

The RrSG supports the goals identified for the **Accountability and Transparency Review (ATR)**, and agrees that the ATR is the appropriate mechanism to achieve those goals. The RrSG further supports the Review Standing Committee (RSC) consideration about whether the ATR should review implementation of prior ATR output and the effectiveness of deployed solutions.

The ATR cadence of once every five years is appropriate, as is the 12-month timeframe to complete the ATR. **The RrSG strongly supports the proposal to time the beginning of the ATR based on the Board approval of the resolution dealing with the previous ATR recommendations, as well as the maximum of 12 months** from the delivery of the ATR report to the Board.

The deferral process is well-considered and the RrSG agrees that the duration should be entirely sufficient and include enough ICANN Public Meetings to ensure robust Community discussion can occur as needed. We are sensitive to the fact that this is a new process which may need to be adjusted with the benefit of experience and support consideration of changes at the appropriate time in the future.

The RrSG supports the engagement of experts to support the review effort, and the general composition of the ATR team, and further notes with support that the shortlist of topics to be reviewed will be published for Public Comment.

Structural Review

The RrSG **supports the intent of the new Structural Review** and considers that this is an appropriate way to evaluate whether the ICANN structure supports the ICANN's ability to achieve its mission, whether changes would improve effectiveness, and whether communications within and between the varying parts of ICANN are effective.

The RrSG notes that **recommendations are advisory rather than compulsory and appreciates that non-acceptance of recommendations requires a rationale**. While there is a real concern that important recommendations may not be accepted, the RrSG recognizes that there may be reasonable disagreement with the specifics; ultimately we trust each group within the ICANN Community to make decisions that are in the best interest of the group they represent while also balancing that with the need to consider alternate perspectives and input and sometimes accept unappealing or complex changes for the greater good.

The RrSG **supports the 15-year cadence for Structural Reviews** and notes that, if problems are identified outside this timeframe, an On Demand review may be available to address them. As with the ATR timing trigger, in the case of the Structural Review the RrSG does support the trigger being the Board of Directors resolution dealing with the previous

Structural Reviews Recommendations as well as the maximum threshold of not more than 12 months from delivery of that report to the Board.

The RrSG notes the apparent **absence of clear requirements regarding who actually performs the Structural Review**. In the ATR and On-Demand Framework sections the Report includes a “Review Effort” section which documents the expected composition of the review team (§3.1.1.6 and §3.2.2.5, respectively) while 3.1.2.5 Review Effort refers to “a Cross-Community Working Group, using existing practices” without further defining the structure or makeup of that team. This should be further defined to avoid confusion when that Structural Review Phase 2 comes to pass.

On-Demand Review Framework and One-Time Review

The RrSG **supports the creation of the On-Demand Review Framework** and agrees with the proposed structure in which issues may fit into the scheduled ATR process or may be reviewed separately if the required conditions are met.

The RrSG **supports the Reviews CCG Recommendation to conduct a one-time assessment of the pilot Continuous Improvement Program and agrees that the scope is appropriate**.

As with the ATR and Structural Review, the RrSG is interested in the **rationale for the apparent decision not to require a Public Comment period** for the review output for the On-Demand and One-Time Reviews.

Implementation of Review Outcomes

Noting our earlier comments regarding acceptance of the Structural Review output, the RrSG **supports the Reviews CCG Recommendation to maintain the existing Bylaw requirement for the ICANN Board of Directors to take action on a final review report within six months**. We also support the use of the Implementation Review Team structure to support oversight and continuity through the implementation phase.

Conclusion

The RrSG once again thanks the members of the Reviews CCG and ICANN Org staff for their work in this very important Review of Reviews process.

Thank you,

Owen Smigelski
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