

Individual Public Comment — Review of Reviews

Draft Report

NOTE: I also participate as an ‘Observer’ in the RoR CCG.

Executive Summary

I welcome the work of the Review of Reviews Cross Community Group and support the objective of creating a more focused, sustainable, and effective review system. The Reviews CCG was chartered to conduct a fundamental evaluation of ICANN's reviews as a whole system, including the effectiveness of existing reviews, their implementation, and whether the current framework continues to meet the needs of the ICANN community. As an end user, I notice that At-Large supports: [2]

- retaining a scheduled Accountability and Transparency Review;
- creating a separate Structural Review;
- establishing an On-Demand Review mechanism;
- improving oversight of the implementation of review recommendations; and
- conducting an independent assessment of the Continuous Improvement Program pilot before relying on it as a permanent substitute for Organizational Reviews. [3]

The proposed model nevertheless requires additional safeguards to ensure that efficiency and resource management do not weaken independent accountability. From an end-user perspective, the principal concerns are:

- The proposed review-initiation thresholds may be too high, especially for emerging consumer, security, privacy, accessibility, or systemic accountability concerns. [4]
- Individual Internet-user interests and global public-interest effects should be explicitly considered throughout scoping, review, implementation, and evaluation.
- The proposed thresholds for initiating reviews may be too high, particularly for emerging consumer, security, privacy, accessibility, or systemic accountability concerns. [4]
- SSR, RDS, and CCT matters should not lose the regular, specialized, and independent attention they receive under the current Specific Reviews framework.[5][4]
- Board and ICANN org participation in review bodies must not compromise the independence of reviews examining their own conduct or performance.
- Review implementation must be measurable, transparent, time-bound, and subject to meaningful community oversight.

The Draft Report proposes two scheduled reviews, an On-Demand Review Framework, a standing Reviews Scoping Committee, and stronger implementation mechanisms. I support this general architecture, subject to the recommendations below. [4]

Detailed Comments and Recommended Revisions

Page 5, Section 1.2 — Definition of the Purpose of Reviews

Observation or concern: The proposed definition properly emphasizes ICANN's Mission, Bylaws, Commitments, Core Values, and Transparency Obligations. However, it does not expressly require consideration of the consequences of ICANN's conduct for individual Internet users or the global public interest within ICANN's Mission. The ICANN Bylaws, Article 1, core values explicitly call for "seeking and supporting broad, informed participation reflecting the functional, geographic, and cultural diversity of the Internet at all levels of policy development and decision-making." A definition of reviews that omits end-user effects is therefore incomplete on its own terms.[5][4]

Recommendation and proposed wording: Add: *"Reviews shall also assess, within the scope of ICANN's Mission, the effects of ICANN's processes, decisions, structures, and implementation activities on individual Internet users, including effects on security, stability, consumer trust, accessibility, meaningful participation, and the global public interest."*

Pages 5–6, Sections 2.1–2.2 — Role of the RSC

Observation or concern: I support centralized coordination, but the proposed RSC would exercise substantial authority over topic screening, feasibility, timing, deferrals, charters, and resources. The RSC is described as a process management body that screens review topics against established criteria, assesses dependencies, overlapping initiatives, and ongoing work, and then sends its recommendations to the SOs and ACs for endorsement. This creates a risk that a process-management body could become an accountability gatekeeper. The final determination of whether five SOs and ACs agree on a set of topics before a charter is drafted and submitted to the Board concentrates considerable power in a standing committee whose composition and mandate are not yet set out in the Bylaws. [4]

Recommendation: Clarify that the RSC is a facilitative and coordinating body, not a substantive decision-maker on the merits of an accountability concern. The RSC should not reject a topic solely because it is difficult, politically sensitive, or resource-intensive. Every exclusion, deferral,

consolidation, or narrowing decision should include a published rationale and a response to minority views.

Page 6, Section 2.3 — RSC Composition

Observation or concern: The proposed RSC would comprise a representative from the leadership of each SO and AC, a representative from the ICANN Board, a representative from ICANN org, and leadership from the immediately preceding ATR. Representation only from the leadership of each SO and AC may create distance from the broader communities the representatives are expected to serve. Board and ICANN org participation also creates potential conflicts when the RSC scopes reviews of Board or org accountability. The Draft Report states that RSC representatives "will act on behalf of their group, voicing their group's views in committee discussions," which makes individual community members and unaffiliated participants structurally invisible. [4]

Recommendation: Require open SO/AC appointment procedures, defined terms, alternates, conflict-of-interest disclosures, geographic and gender diversity, and relevant expertise. Board and ICANN org representatives should normally serve as liaisons or non-voting participants when the RSC is considering reviews of their performance. At a minimum, mandatory recusal rules should apply.

Page 6, Section 2.3 — Accountability of RSC Members

Observation or concern: The statement that members act "on behalf of their group" is appropriate for liaison purposes but may encourage positional negotiation rather than independent assessment of review needs. This formulation risks converting the RSC into a negotiating table where organizational preferences override the wider ICANN community's interest in effective accountability. [4]

Recommendation: Add that RSC members must consider the interests of the ICANN community, comply with the RSC charter, and accurately communicate both majority and material minority views from their appointing communities.

Pages 6–7, Section 3 — Overall Refreshed System

Observation or concern: The Final Report should more clearly explain how every category identified in the CCG charter is treated. In particular, the disposition of the Annual Review under Bylaws Section 4.5 is not sufficiently visible in the proposed framework. The Bylaws currently require ICANN to produce an Annual Review Implementation Report on the state of accountability and transparency reviews and the status of ICANN's implementation of recommendations from final review team reports. This obligation does not appear to be explicitly preserved or replaced in the Draft Report. In addition, the treatment of Organizational Reviews — described as superseded by the CIP pilot — involves ongoing Bylaws obligations that require explicit community deliberation before they can be extinguished.[6][7][2][5][4]

Recommendation: Include a transition table identifying the treatment of: Organizational Reviews, the Annual Review, each Specific Review, previously completed reviews, and reviews that were formally recommended but not conducted. No existing Bylaws obligation should disappear without an explicit rationale, community consultation on the Bylaws amendment, and an assessment of the accountability consequences of removal.

Pages 7–8, Section 3.1.1.2 — ATR Focus

Observation or concern: I support retaining a five-year Accountability and Transparency Review. However, incorporating multiple Specific Review subjects into a broad ATR may lead to competition among important topics and insufficient specialist attention. The Draft Report acknowledges that the essence of Specific Reviews — SSR, RDS, and CCT — is built into ICANN's Mission, Commitments, and Core Values, and that those areas benefit from a separate opportunity for review within the On-Demand framework. Nevertheless, the mechanism for ensuring that this separate opportunity is actually used and that the depth of previous Specific Reviews is maintained is not clearly defined. [4]

Recommendation: State that the ATR's scope must preserve meaningful examination of accountability, transparency, SSR, RDS, CCT, and prior implementation where evidence demonstrates a need. Consolidation should not reduce the depth, independence, expertise, or data collection previously available through Specific Reviews.

Page 8, Section 3.1.1.2 — Implementation of Previous Recommendations

Observation or concern: The Draft Report states that the RSC "should consider whether" an ATR should review the implementation of prior ATR outputs. Implementation is central to accountability and should not be optional. The ATRT3 found persistent gaps between recommendations and implementation, a problem that a permissive formulation will not cure.[3][4]

Recommendation: Replace with: *"Each ATR shall assess the implementation status, effectiveness, intended and unintended consequences, and measurable outcomes of recommendations from prior ATRs and other relevant reviews."*

Page 8, Section 3.1.1.2 — Ongoing Processes

Observation or concern: The Draft Report states that each review "cannot be used as a vehicle for mitigating, relitigating or influencing ongoing processes." This limitation is understandable but potentially overbroad. An ongoing process should not shield systemic procedural failures, noncompliance, or accountability deficiencies from examination. [4]

Recommendation: Clarify: *"A review shall not intervene in or determine the outcome of a pending individual proceeding. This limitation does not prevent examination of systemic design, procedural fairness, transparency, compliance, or recurring deficiencies associated with an ongoing process."*

Pages 9–10, Section 3.1.1.4 — ATR Scoping

Observation or concern: The scoping process begins with topics submitted through SO/AC and Board structures, with each SO or AC settling on an initial slate of up to three topics. This may disadvantage unaffiliated users, newcomers, civil society participants, and people unable to engage continuously in ICANN working structures. The maximum of three topics per SO/AC may also force At-Large to exclude important user concerns prematurely. The ICANN Bylaws core values require ICANN to seek "broad, informed participation reflecting the functional, geographic, and cultural diversity of the Internet." [5][4]

Recommendation: Conduct an open public call for issues before SO/AC slates are finalized. Permit topics raised through Public Comment to be added or reconsidered where supported by evidence. The three-topic limit should be a planning guideline rather than an absolute restriction. Publish a disposition document explaining how every proposed topic and public comment was treated.

Pages 9–10, Section 3.1.1.4 — Feasibility and Resources

Observation or concern: Resource assessment is necessary, but affordability should not become a substantive veto over accountability. The current draft allows resource constraints to affect the set of topics that are reviewed, without establishing a clear distinction between types of barriers or requiring alternatives to outright rejection. [4]

Recommendation: Require the RSC and ICANN org to distinguish between: lack of jurisdiction, duplication, lack of evidence, temporary resource constraints, and disagreement with the topic. Where resources are the problem, the RSC should consider phased review, narrower scope, independent research, or revised timing rather than rejection.

Pages 10–11, Section 3.1.1.5 — ATR Deferral

Observation or concern: The draft permits a maximum of two deferrals: the first lasting up to 18 months and the second up to 12 months. Two deferrals could postpone a five-year review by as much as 30 additional months. This could create an extended accountability gap and undermine the predictability that the community relies on. [4]

Recommendation: The cumulative deferral period should normally not exceed 18 months. Any second deferral should require enhanced SO/AC support, Public Comment, a documented assessment of end-user and public-interest risks, and an interim accountability status report. Deferral should not be permitted where credible evidence indicates serious Bylaws noncompliance or material systemic harm.

Page 11, Section 3.1.1.6 — Review Team Composition

Observation or concern: The proposed Community Review Team would consist of three representatives from each SO and AC, three Board representatives, and three ICANN org

representatives. This could produce an excessively large team. Equal Board and org membership may also create independence concerns when the review examines their own performance. The draft does not specify expertise, geographic diversity, or support for volunteers from underserved regions. [4]

Recommendation: Use a competency-based selection process with balanced SO/AC representation, subject-matter expertise, geographic, linguistic, gender, and stakeholder diversity. Board and org participants should normally be non-voting liaisons in reviews examining Board or org accountability. Support should be available for volunteers from underserved regions and less-resourced communities.

Page 11 and Similar Provisions — Members Acting on Behalf of Groups

Observation or concern: Review teams should conduct evidence-based independent analysis. Requiring members to act as instructed representatives may transform reviews into negotiations among organizational positions, as has been observed in previous review processes. [4]

Recommendation: State that members are nominated by their communities, maintain liaison responsibilities, and participate in the review in accordance with the charter, evidence, and applicable standards rather than under binding instructions.

Page 11 and Similar Provisions — SO/AC Sign-Off on Final Reports

Observation or concern: The draft states that the final report would be submitted to SOs and ACs for formal sign-off before submission to the ICANN Board. Requiring formal SO/AC sign-off before a final review report is submitted to the Board may allow political disagreement to block or dilute independent findings. [4]

Recommendation: SOs and ACs should be invited to indicate support, concerns, or minority positions, but should not have a veto over publication or transmission of a Review Team's final findings. The report, community statements, and Public Comment summary should be submitted together to the Board.

Pages 12–14, Section 3.1.2 — Structural Review

Observation or concern: I support a dedicated Structural Review. However, it should explicitly examine whether ICANN's structure facilitates meaningful participation by individual users, particularly participants from developing regions, underrepresented language communities, and organizations with limited resources. The current draft focuses primarily on whether ICANN's structures and governance arrangements remain fit for purpose, without explicitly assessing participation equity. [4]

Recommendation: Add assessment criteria covering participation barriers, volunteer workload, accessibility, multilingualism, geographic diversity, capture risks, accountability across ICANN bodies, and the effectiveness of At-Large mechanisms for conveying individual end-user interests.

Page 13, Section 3.1.2.3 — Structural Review Cadence

Observation or concern: The draft proposes a cadence of every 15 years, while noting that a member and some observers suggest a ten-year window. Fifteen years is too long in view of changes in technology, regulation, DNS markets, cybersecurity, and the multistakeholder environment. Given the pace of change in Internet governance since 2016, a 15-year cadence would have meant no structural review of the current ICANN model since IANA stewardship transition.[2][4]

Recommendation: Establish a ten-year Structural Review cadence, supplemented by an external landscape assessment or structural health check every five years. Material changes may also trigger an On-Demand Structural Review.

Pages 12–13 — Structural Changes Affecting SOs and ACs

Observation or concern: Recommendations affecting an SO or AC are described as advisory, which respects bottom-up autonomy. However, major changes may have consequences for the entire ICANN system and for communities not represented in the affected body. The draft does not specify a timeframe for SO/AC response or require that responses address system-wide effects. [4]

Recommendation: Require affected SOs and ACs to respond publicly within a defined period. Their responses should address system-wide effects, effects on individual users, and any risks identified by other SOs and ACs. Rejection should include evidence and rationale.

Pages 15–16, Section 3.2.2 — SSR and RDS Cadence

Observation or concern: The proposal rotates between SSR and RDS two years after each ATR. This could mean that each subject receives a formal need assessment only approximately once per decade. This is especially concerning for SSR because security threats and DNS abuse evolve rapidly. The current Bylaws require SSR and RDS reviews at least every five years, and the proposal represents a material reduction in review frequency without demonstrated equivalence of protection.[5][4]

Recommendation: SSR and RDS should each receive a separate, Bylaws-mandated need assessment at least once during every five-year ATR cycle. The system should not require the community to choose between examining security and examining registration-data issues.

Pages 15–16 — CCT Review

Observation or concern: The draft proposes an initial CCT need determination within two years of first delegation in the current new gTLD round and thereafter treats CCT as an On-Demand review under Section 3.2.3. Competition, consumer trust, and consumer choice are directly relevant to end users. Treating future CCT work primarily as optional or On-Demand could weaken accountability for new gTLD rounds, where user effects may not fully materialize for several years after delegation. [4]

Recommendation: Retain a mandatory post-round CCT assessment based on predefined data and consumer-impact indicators. A preliminary evaluation may occur within two years of first delegation, but the final assessment should occur only after sufficient market and user-impact evidence is available.

Page 15 — Review of Reviews Cadence

Observation or concern: The draft proposes that the Review of Reviews should occur every ten years. A ten-year cycle may be appropriate after the system matures, but it is too long for the first evaluation of a newly redesigned framework. [4]

Recommendation: Conduct the first Review of Reviews no later than five years after the refreshed system becomes operational. A ten-year cadence may apply thereafter if the first evaluation confirms that the system is effective.

Pages 16–18 — Thresholds for Focused and On-Demand Reviews

Observation or concern: For SSR, RDS, and CCT, the process requires initial interest from at least two SOs and/or ACs, moving to five SOs and ACs for final endorsement. For other On-Demand reviews, the same threshold of five groups applies. This threshold may prevent examination of matters affecting end users but not attracting broad institutional attention. The risk is especially acute for emerging privacy, consumer protection, accessibility, security, and accountability concerns, where the most affected communities may not have strong institutional representation within ICANN's structures.[8][4]

Recommendation: Use a graduated threshold: two SOs or ACs to initiate scoping and four to authorize a review after consultation. Support should include both SO and AC participation. Alternatively, retain the five-group threshold only if an expedited pathway is available for urgent public-interest, consumer-harm, SSR, or systemic-accountability matters.

Pages 17–18, Section 3.2.3 — Urgent Matters

Observation or concern: The section refers to "pressing need" as a trigger but does not establish deadlines for the RSC to act on an urgent basis. An urgent matter could remain in screening for an indefinite period, defeating the purpose of urgent review. [4]

Recommendation: Establish time limits for acknowledgment, preliminary screening, feasibility analysis, Public Comment, and final determination. The RSC should publish an expedited schedule where delayed review could expose users or the DNS ecosystem to continuing material harm.

Pages 17–18 — Public Comment in On-Demand Review Process

Observation or concern: Public Comment occurs after several institutional screening stages. Public submissions may therefore have limited ability to change the proposed scope. The ICANN Bylaws commit ICANN to "responsive consultation procedures that provide detailed explanations of the basis for decisions (including how comments have influenced the development of policy considerations)."[5][4]

Recommendation: Public Comment should be capable of adding, narrowing, correcting, or opposing topics. The RSC should publish a detailed comment-analysis report explaining what changed because of the consultation.

Pages 19–20, Section 3.2.4 — Consequential Effects Review

Observation or concern: The draft describes a Consequential Effects Review as Phase 3 of the Structural Review, to be activated where Phase 2 produces structural change recommendations, and as a process within On-Demand reviews. Structural changes may have effects extending beyond the SO or AC initiating them, including reduced user representation, increased participation barriers, or shifts in accountability. The current draft does not require an end-user impact assessment as part of the Consequential Effects Review. [4]

Recommendation: Require a Consequential Effects Review to include a documented end-user and public-interest impact assessment, covering accessibility, diversity, participation, accountability, security, and capture risks. Major structural changes should not be finalized before that assessment and an associated Public Comment proceeding.

Pages 20–21, Section 3.3 — One-Time CIP Review

Observation or concern: I support the conclusion that it would be premature to build the permanent reviews system on the assumption that the CIP pilot will succeed. The Continuous Improvement Program was developed as a community-led framework intended to replace periodic external Organizational Reviews with continuous, internally managed assessments of ICANN structures. The proposed one-time assessment is therefore essential. However, the draft does not specify assessment criteria, independence requirements, or the consequences of a negative finding.[3][4]

Recommendation: The CIP assessment should be independent, evidence-based, and conducted against criteria adopted before the pilot ends. It should evaluate consistency across groups, participation burden, measurable improvement, follow-through, comparability, transparency, and whether internally managed assessment provides accountability equivalent to independent review. The CIP should not permanently replace Organizational Reviews unless this assessment supports that conclusion.[7][3]

Page 21, Section 4 — Review Team Continuity

Observation or concern: At-Large supports keeping Review Teams active until Board action and retaining the six-month Board-action deadline. This is a meaningful improvement over previous practice, where review teams sometimes dissolved before Board action was complete. [4]

Recommendation: Add that the Board must provide a recommendation-by-recommendation decision, supporting rationale, proposed implementation owner, expected resources, and schedule. Rejection or material modification should include a detailed explanation and, where appropriate, further community consultation.

Page 21 — Implementation Review Teams

Observation or concern: The draft provides for Implementation Review Teams (IRTs) to preserve expertise and continuity during the implementation of review recommendations. IRTs should not be permitted to rewrite the substance of an accepted recommendation under the label of implementation. [4]

Recommendation: Define the IRT's mandate as overseeing faithful implementation. Material departures from the recommendation's intent should be referred back to the Review Team, where available, or subjected to Public Comment and Board explanation.

Page 21 — Implementation Monitoring

Observation or concern: The draft assigns the RSC a monitoring role in reviewing implementation. This is positive, but implementation accountability requires measurable information accessible to the whole community, not only to the RSC. [4]

Recommendation: Establish a public dashboard showing each recommendation, Board decision, owner, budget, dependencies, milestones, implementation status, performance indicators, expected completion date, changes in scope, and reasons for delay. Closed recommendations should include an outcome and effectiveness assessment, not merely confirmation that an activity was completed.

Page 22, Section 5 — Implementation of the Refreshed System

Observation or concern: The Draft Report anticipates Bylaws amendments, new charters, operating standards, and an implementation team. However, it does not provide enough detail about transition safeguards. Given that the Reviews CCG Board charter was only approved in September 2025, and the final report must still be submitted to Nominating Groups and then to the ICANN Board, the transition period could be lengthy. The risk of an accountability gap during transition is real.[6][4]

Recommendation: Existing review obligations should remain effective until replacement mechanisms, the RSC charter, operating standards, review charters, and implementation procedures are operational. The community should have separate opportunities to comment on the Bylaws amendments, RSC charter, operating standards, and transition plan.

Cross-Cutting — Accessibility and Participation

Observation or concern: The system depends heavily on community consultation, but the Draft Report does not consistently specify accessibility or multilingual participation requirements. ICANN's Bylaws commit the organization to facilitating translation and to seeking "broad, informed participation reflecting the functional, geographic, and cultural diversity of the Internet." The review process will only be credible if communities across all regions and language groups can participate meaningfully.[5][4]

Recommendation: Require plain-language summaries, accessible document formats, interpretation or translation consistent with ICANN language services, reasonable consultation periods, remote participation, and outreach beyond established ICANN participants.

Cross-Cutting — Evidence and Data

Observation or concern: Review scoping and implementation should be based on evidence rather than institutional preferences or unsupported assumptions. The current draft does not systematically address what data will be collected, how datasets will be made available, or how independent analysis will be commissioned. [4]

Recommendation: Require early identification of data needs, publication of relevant datasets subject to privacy and confidentiality protections, independent research where appropriate, and measurable indicators of effects on individual users

Cross-Cutting — Interaction with Existing ICANN Accountability Mechanisms

Gap identified: The Draft Report does not clearly address how the refreshed reviews system will interact with other existing ICANN accountability mechanisms, including reconsideration requests, independent review processes (IRP), and the Ombudsman function. Reviews and accountability mechanisms serve complementary but distinct functions; the boundary between them should be clearly articulated to avoid gaps and overlaps. [5]

Recommendation: The Final Report should include a brief mapping of how the reviews system relates to Article 4 accountability mechanisms, including clarity on: (a) whether findings from an ATR or On-Demand Review can inform reconsideration or IRP proceedings; (b) how systemic findings from a review that overlap with individual accountability requests should be handled; and (c) whether the RSC's process management authority extends to matters that could also be addressed through reconsideration or independent review.

Cross-Cutting — At-Large and End-User Representation Throughout the System

Gap identified: While the At-Large Advisory Committee is one of the SOs/ACs represented on the RSC and review teams, the Draft Report does not specifically address how the interests of individual, unaffiliated Internet users — the population At-Large most directly represents — are systematically incorporated into review processes beyond formal ALAC participation. Individual users cannot file public comments in all stages, may lack awareness of review processes, and are disproportionately affected by DNS security, consumer trust, and data protection outcomes.^{[9][8]}

Recommendation: The Final Report and subsequent operating standards should include explicit provisions to: (a) ensure At-Large regional structures are notified and supported in participating in review scoping and comment processes; (b) establish a mechanism for community members not affiliated with any SO or AC to contribute to review scoping through a dedicated open call that is publicized broadly, including through ICANN's At-Large regional organizations; and (c) require review teams to prepare public-facing summaries of findings and recommendations accessible to non-specialist audiences.

Proposed Overall Statement

I support the creation of a more strategic and flexible ICANN review system. However, flexibility must not reduce the independence, predictability, or enforceability of ICANN's accountability mechanisms. [4]

The Reviews Scoping Committee can provide valuable coordination, prevent unnecessary duplication, and improve resource planning. It should not become a gatekeeper capable of excluding legitimate accountability matters because they are difficult, expensive, or insufficiently supported by institutionally powerful groups. Its authority, composition, conflicts of interest, decision-making criteria, and transparency obligations must therefore be clearly defined in the ICANN Bylaws, its charter, and applicable operating standards. [4]

I also emphasize that the interests of individual Internet users must be visible throughout the refreshed system. This includes topic selection, review-team composition, impact assessment, implementation planning, evaluation of outcomes, and consideration of structural changes. Public Comment should not function merely as validation after institutional decisions have effectively been made; it must provide a meaningful opportunity to alter the proposed scope, process, and outcome. [5]

The incorporation of SSR, RDS, and CCT matters into the ATR and On-Demand frameworks requires particular care. These areas directly affect DNS security, registration-data governance, competition, consumer trust, and consumer choice. Their inclusion in a broader system should not result in less frequent assessment, weaker expertise, reduced independence, or competition among fundamentally different accountability priorities. [4]

I support stronger implementation oversight, including continued Review Team involvement, Implementation Review Teams, RSC monitoring, and the six-month deadline for Board action. These measures should be supplemented by public implementation plans, measurable performance indicators, transparent reporting of delays and dependencies, and evaluation of whether implemented solutions produced the intended results. [4]

The transition to the refreshed system must not create an accountability gap. Current Bylaws obligations should remain effective until the replacement framework is fully established. The associated Bylaws amendments, RSC charter, operating standards, review charters, and transition arrangements should each be developed through transparent community processes. [5]

The refreshed system must address how it interacts with ICANN's existing Article 4 accountability mechanisms — reconsideration, independent review, and the Ombudsman — and must specifically ensure that unaffiliated individual Internet users have meaningful and accessible channels to participate in review processes, not only through formal SO/AC structures.[8][5]

Subject to these safeguards and revisions, I support advancing the proposed refreshed reviews system.

References

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7. [Continuous Improvement Program Framework | July 2025](#) - ICANN Board took action in June 2022 to defer the next cycle of Organizational Reviews. By June 2025...
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