

Public Comment on the Review of Reviews Draft Report (2026)

*Strengthening Transparency, Accountability, and Inclusive Governance of the Review
Scoping Committee (RSC)*

Expanded Individual Public Comment

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Core position: ICANN should modernize its review framework, but efficiency gains must be matched by transparent, accountable, inclusive, and well-documented decision-making by the proposed Review Scoping Committee.

Document Note

This expanded version upgrades the original concise public comment by applying the enhanced policy-paper framework. It retains the original support for ICANN's reform effort, deepens the analysis of the Review Scoping Committee, and adds implementation detail, stakeholder analysis, risk controls, success indicators, and appendices suitable for a stronger ICANN Public Comment submission.

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Executive Summary

This individual public comment supports ICANN's effort to modernize and improve its review framework through the Review of Reviews Draft Report. ICANN reviews are not only administrative exercises; they are core accountability instruments that allow the community to evaluate whether ICANN, its Supporting Organizations, Advisory Committees, review teams, and related structures remain effective, transparent, accountable, and aligned with the public interest. The current review system has generated important value, but it has also faced practical challenges, including overlapping review cycles, heavy volunteer workload, long implementation timelines, uneven documentation, and difficulty maintaining broad participation across regions, stakeholder groups, and experience levels.

The proposed refreshed framework, including Scheduled Accountability and Transparency Reviews, Structural Reviews, On-Demand Reviews, and the proposed Review Scoping Committee (RSC), can help ICANN reduce duplication, prioritize scarce resources, and make the review process more predictable. However, the RSC would also become a highly influential governance body because it would shape review initiation, scope, timing, feasibility, resource allocation, and, in practice, the community's ability to evaluate institutional performance. For this reason, the RSC's operational authority should be matched by equally strong transparency and accountability obligations.

The main concern of this comment is that a reformed review system could unintentionally concentrate procedural power in the RSC without defining sufficient safeguards around decision-making. The draft framework should more clearly define how RSC members are selected, what criteria they apply, how conflicts of interest are handled, how decisions are documented, when public consultation is required, how minority or dissenting views are captured, how deferrals are justified, and what mechanism exists if a stakeholder believes a scoping decision is inconsistent with ICANN's accountability principles. Without these safeguards, efficiency improvements may be perceived as limiting community oversight rather than improving it.

This comment therefore recommends that ICANN incorporate a transparent governance architecture for the RSC. At minimum, the final framework should require detailed decision reports for all major scoping outcomes; publication of agendas, meeting minutes, attendance records, and voting or consensus outcomes; a minimum 30-day public consultation period before major scoping decisions; written justification and risk assessment whenever a review is deferred, consolidated, or narrowed; a searchable public archive and implementation tracker; an independent periodic evaluation of the RSC; and inclusion safeguards for newcomers, developing economies, non-English-speaking participants, and resource-constrained stakeholder groups.

The recommendations in this comment are designed to strengthen, not slow down, the Review of Reviews reform. Predictable documentation and consultation can reduce conflict, improve institutional memory, increase trust, and help the community understand why certain reviews are prioritized, deferred, consolidated, or scoped in a particular way. A transparent RSC would also make it easier for ICANN org, the Board, Supporting Organizations, Advisory Committees, review teams, and individual contributors to coordinate around evidence-based priorities.

In conclusion, ICANN should proceed with reforming its review system, but the final framework should explicitly define the RSC as a transparent, accountable, and community-facing body. The success of the Review of Reviews initiative should be measured not only by fewer meetings or faster timelines, but also by whether the reformed system improves trust, broadens participation, preserves institutional legitimacy, and reinforces ICANN's multistakeholder model for years to come.

1. Introduction

ICANN's multistakeholder model depends on the ability of diverse participants to understand, evaluate, and influence policy and governance processes. Transparency and accountability are therefore not optional values; they are operational conditions for trust. Public Comment proceedings play an important role in this model because they allow individuals, community groups, Supporting Organizations, Advisory Committees, technical experts, civil society, business users, governments, and newcomers to place their views into the official record.

ICANN reviews serve a related but deeper governance function. They provide structured opportunities to examine whether ICANN and its community structures are meeting their intended purposes, whether recommendations from previous reviews are being implemented, and whether accountability and transparency commitments remain effective in practice. Reviews can also reveal gaps in participation, duplication of work, outdated processes, and areas where the community may need additional support.

The Review of Reviews Draft Report is therefore a significant institutional moment. The objective is not merely to simplify a process; it is to redesign a core accountability system so that it remains effective under contemporary conditions. The ICANN community has grown, the volume of policy and operational work has increased, and the capacity of volunteers is limited. A well-designed review framework can help align priorities, avoid unnecessary duplication, and ensure that review work produces meaningful improvements rather than procedural fatigue.

This comment supports modernization of the reviews framework. At the same time, it emphasizes that efficiency must not come at the expense of transparency, accountability, inclusion, or community trust. A reformed review system will only be legitimate if stakeholders can see how decisions are made, what evidence is considered, how trade-offs are handled, and how concerns can be raised before final decisions are taken.

The focus of this comment is the proposed Review Scoping Committee (RSC). Because the RSC would influence whether reviews proceed, how reviews are scoped, and how resources are allocated, it should be designed with clear governance safeguards. The RSC should not be treated as a purely administrative mechanism. It should be treated as a key accountability interface between the ICANN community, ICANN org, the Board, and the review system.

Scope of this comment

This submission focuses on five questions: (1) What transparency obligations should apply to the RSC? (2) How should scoping, deferral, and prioritization decisions be justified? (3) How should community consultation be structured before major RSC decisions? (4) How can the reformed review system remain accessible to newcomers and participants from developing economies? (5) What metrics and evaluation mechanisms should be used to determine whether the RSC is functioning properly?

2. Background and Context

The existing ICANN review framework includes Specific Reviews and Organizational Reviews. Specific Reviews, such as Accountability and Transparency Reviews (ATRT), Security, Stability, and Resiliency Reviews (SSR), and Competition, Consumer Trust, and Consumer Choice Reviews (CCT), have historically provided formal mechanisms for community-led assessment of ICANN's performance against key commitments. Organizational Reviews assess whether Supporting Organizations, Advisory Committees, and other structures remain effective, accountable, and fit for purpose.

This system has generated valuable recommendations, but it has also created practical pressures. Review cycles may overlap with policy development work, implementation of past recommendations may

remain in progress while new reviews begin, and volunteer participants may be asked to serve repeatedly across many ICANN processes. These challenges are especially difficult for newcomers, small organizations, developing economies, and participants who cannot dedicate full-time capacity to ICANN work.

The Review of Reviews initiative responds to these conditions. Its proposed refreshed framework aims to create a more coherent system, reduce duplication, align review timing with institutional priorities, and use resources more effectively. The original public comment correctly identifies the RSC as one of the most influential elements in the proposed model because it would have a role in determining review scope, timing, feasibility, and resource allocation.

A refreshed review system should therefore be assessed against two sets of criteria. The first set is operational: Does the system reduce unnecessary duplication, improve scheduling, and produce recommendations that can realistically be implemented? The second set is governance-oriented: Does the system preserve transparency, enable meaningful participation, provide accountability for decision-makers, and maintain community trust? Both sets of criteria are necessary. A review system that is efficient but opaque would not meet the needs of ICANN's multistakeholder model.

The proposed RSC can become a useful coordination mechanism if it is grounded in clear rules. It can help identify when a review is necessary, when a review should be deferred, when multiple questions should be consolidated, and when scope should be narrowed to ensure that review teams can deliver results. However, these same powers create governance risk if they are exercised without adequate documentation, consultation, or oversight.

Motivation for reform

- Reduce duplication across review processes and avoid asking the same volunteers to address overlapping institutional questions.
- Improve predictability in review planning so that community groups can prepare, allocate time, and participate meaningfully.
- Connect review recommendations to realistic implementation capacity and measurable outcomes.
- Preserve ICANN's accountability mechanisms while reducing unnecessary procedural burden.
- Improve the quality of institutional memory through better documentation of decisions, assumptions, risks, and follow-up actions.

3. Problem Statement

The central problem is not the existence of the RSC. The RSC may be necessary to make the review system more workable. The problem is that the RSC's authority could become significant without equivalent governance safeguards. If the RSC can shape when reviews happen, how broadly they are scoped, and whether a review should be deferred or consolidated, then stakeholders need clear visibility into the basis for those decisions.

The original public comment identifies several gaps: insufficient transparency obligations, unclear documentation requirements, limited decision justification, lack of community appeal mechanisms, and uncertain oversight arrangements. These gaps should be addressed in the final framework because they affect whether stakeholders perceive the reformed review system as legitimate.

A scoping decision can have major substantive consequences. Narrowing a review may exclude important accountability questions. Deferring a review may delay examination of an issue that some stakeholders consider urgent. Consolidating reviews may improve efficiency but reduce the specificity of findings. Prioritizing one review over another may shape which community concerns receive attention.

These decisions are not merely procedural. They determine how accountability is experienced in practice.

The risk is especially significant for developing economies and newcomers. Participants with less institutional knowledge depend heavily on published documents, plain-language explanations, meeting records, consultation archives, and predictable timelines. When decisions are made through informal channels or insufficiently documented meetings, experienced insiders can still follow the process, but newer and less-resourced participants are effectively excluded. A transparent RSC would therefore strengthen inclusion as well as accountability.

A second risk is that efficiency may be misunderstood as reduction of scrutiny. If the community sees reviews being deferred, narrowed, or consolidated without clear explanation, the reform may appear to weaken accountability even if its purpose is to improve performance. The final framework should avoid this perception by requiring structured justification, public consultation, and periodic independent evaluation.

Governance gaps that should be addressed

- **Authority gap:** The framework should specify the limits of the RSC's mandate and clarify which decisions are advisory, which are binding, and which require Board or community confirmation.
- **Transparency gap:** The framework should define minimum publication requirements for agendas, minutes, attendance, decision reports, supporting evidence, and final outcomes.
- **Accountability gap:** Stakeholders should know how to challenge or request reconsideration of a major scoping decision.
- **Inclusiveness gap:** The process should provide accessible summaries, reasonable consultation windows, and participation support for newcomers and developing economies.
- **Metrics gap:** The RSC should be evaluated against objective indicators, not only informal satisfaction or perceived efficiency.

4. Stakeholder and Governance Analysis

The RSC would sit at the intersection of several stakeholder interests. The ICANN Board needs a review system that supports accountability while remaining feasible. ICANN org needs predictable processes that can be staffed and implemented. Supporting Organizations and Advisory Committees need reviews that respect their roles and do not overwhelm their volunteer capacity. Review teams need clear scope and access to information. Individual participants need open documentation and fair opportunities to contribute. Newcomers and underrepresented communities need processes that do not rely on insider knowledge.

Governance principles for the RSC

- **Transparency:** The community should be able to see what decisions were made, why they were made, what evidence was considered, and how dissenting views were handled.
- **Accountability:** The RSC should be evaluated against published criteria and should be answerable to the community, the Reviews CCG or successor oversight body, and the ICANN Board as appropriate.
- **Inclusiveness:** The process should enable meaningful participation by newcomers, developing economies, non-English-speaking participants, and stakeholders with limited time or resources.
- **Predictability:** Stakeholders should understand the timeline, inputs, decision points, publication deadlines, and opportunities to comment before a decision becomes final.
- **Proportionality:** The level of consultation and documentation should match the significance of the decision. Routine administrative matters may need lighter procedures; major scoping or deferral decisions need stronger procedures.

- **Evidence-based decision-making:** Decisions should rely on documented criteria, data, prior review outcomes, implementation status, resource assessments, and community input rather than informal judgment alone.

Institutional legitimacy

Institutional legitimacy in ICANN does not come only from formal authority. It also comes from visible process quality. When decisions are documented, stakeholders may disagree with the outcome but still understand the rationale. When decisions are opaque, even reasonable outcomes may be perceived as procedurally unfair. For a body such as the RSC, legitimacy should be designed into the process through publication, consultation, justification, oversight, and evaluation.

The final framework should therefore avoid a narrow operational definition of the RSC. The RSC should be treated as a governance body that performs coordination functions with accountability consequences. Its procedures should be clear enough that a newcomer can understand how a scoping decision moves from proposal to consultation, deliberation, final decision, implementation, and later evaluation.

5. Detailed Policy Recommendations

The following recommendations build on the original six recommendations and expand them into a more complete governance framework. Each recommendation includes rationale, expected benefits, implementation steps, responsible actors, risks, and success indicators.

1. Publish detailed decision reports for every major scoping decision

Rationale: A scoping decision can determine the practical boundaries of accountability. The community should understand the issue considered, options evaluated, evidence used, stakeholder input received, and reason for the final decision.

Implementation steps:

- Create a standard decision-report template.
- Require the RSC to publish the report before the decision is considered final, except in narrowly defined urgent circumstances.
- Include a plain-language summary so newcomers can quickly understand the decision.

Benefits: Improves predictability, institutional memory, and trust. Reduces confusion about why reviews are initiated, narrowed, deferred, or consolidated.

Actors: RSC, ICANN org support staff, Reviews CCG or successor oversight body, ICANN Board where relevant.

Timeline: Template within 0-3 months; required use for all major decisions within 3-6 months.

Indicators: 100% of major decisions have published reports; reports include rationale, alternatives, risks, and consultation summary.

2. Publish agendas, minutes, attendance, and voting or consensus outcomes

Rationale: Meeting transparency allows the community to follow deliberations, understand participation, and verify that decisions were made through a consistent process.

Implementation steps:

- Publish agendas at least seven days before ordinary RSC meetings.
- Publish minutes, attendance, and decision outcomes within 14 days after meetings.
- Record whether outcomes were reached by consensus, vote, or escalation.

Benefits: Strengthens accountability and prevents the perception that decisions are made informally or without community visibility.

Actors: RSC chair, RSC secretariat, ICANN org.

Timeline: Begin immediately after RSC formation.

Indicators: Publication within deadline; meeting records are searchable and linked to relevant decision reports.

3. Require a minimum 30-day public consultation period before major scoping decisions

Rationale: Consultation is essential when a decision affects review initiation, scope, timing, deferral, consolidation, or resource allocation. A 30-day minimum provides stakeholders time to review materials and prepare input.

Implementation steps:

- Define what qualifies as a major scoping decision.
- Publish proposed decision text and supporting rationale at the start of consultation.
- Allow exceptions only for urgent security, stability, or legal circumstances, with written justification.

Benefits: Encourages broader participation, improves decision quality, and prevents avoidable conflict after decisions are finalized.

Actors: RSC, ICANN org, Supporting Organizations, Advisory Committees, community groups.

Timeline: Adopt rule within 3 months; apply to all major decisions within 6 months.

Indicators: Number of consultations held; diversity of submitters; percentage of final decisions that explain how input was considered.

4. Require written justification and risk assessment for deferrals, consolidations, and narrowed scopes

Rationale: Deferral or narrowing may be reasonable, but it can also delay or reduce accountability. The RSC should explain the operational and governance risks of such decisions.

Implementation steps:

- Require a risk assessment covering accountability, transparency, implementation, volunteer capacity, and stakeholder impact.
- Require an alternative-options section explaining why other approaches were not selected.
- Require a future review trigger or reconsideration date for every deferral.

Benefits: Makes trade-offs visible, avoids indefinite deferrals, and gives stakeholders a predictable basis for follow-up.

Actors: RSC, ICANN org, Board Accountability Mechanisms Committee or equivalent governance body where appropriate.

Timeline: Risk template within 0-3 months; mandatory use within 3-6 months.

Indicators: Every deferral has an expiration, trigger, or review date; risk assessments are published with decisions.

5. Adopt a clear RSC charter, membership model, term limits, and conflict-of-interest rules

Rationale: The RSC's legitimacy depends on who serves, how they are selected, how long they serve, and whether they can participate in decisions where they have institutional or personal conflicts.

Implementation steps:

- Define the RSC mandate and decision authority in a public charter.
- Specify membership categories, selection process, term length, rotation, and diversity considerations.
- Require conflict-of-interest declarations and recusal procedures.

Benefits: Reduces capture risk, improves representativeness, and clarifies accountability for RSC members.

Actors: Reviews CCG, ICANN Board, Nominating Groups, ICANN org legal and governance support.

Timeline: Charter finalized before RSC begins formal decision-making.

Indicators: Public membership list; published conflict disclosures; documented recusals where relevant.

6. Establish a lightweight community reconsideration pathway for major RSC decisions

Rationale: Stakeholders should have a clear way to request review of a major RSC decision that appears procedurally inconsistent, insufficiently justified, or materially incomplete.

Implementation steps:

- Create a limited reconsideration window after publication of final major decisions.
- Allow requests based on process flaws, missing evidence, insufficient consultation, or material new information.
- Require the RSC or oversight body to publish a response.

Benefits: Creates accountability without turning every decision into a formal dispute. Helps correct errors before they damage trust.

Actors: RSC, oversight body, ICANN org accountability staff, ICANN Board where escalation is necessary.

Timeline: Design within 6 months; pilot during first year.

Indicators: Requests acknowledged within a defined timeframe; outcomes and rationales are published.

7. Maintain a searchable public archive and implementation tracker

Rationale: A central archive would help participants follow the history and status of scoping decisions, review timelines, deferrals, consultations, and implementation commitments.

Implementation steps:

- Create a searchable web page or dashboard.
- Link each RSC decision to meeting records, consultation materials, decision reports, risk assessments, and follow-up status.
- Update status quarterly.

Benefits: Improves institutional memory, lowers newcomer barriers, and reduces repeated questions across the community.

Actors: ICANN org, RSC secretariat, community review support staff.

Timeline: Basic archive within 3 months; dashboard enhancements within 6-12 months.

Indicators: Archive completeness; update frequency; user feedback from newcomers and stakeholder groups.

8. Conduct periodic independent evaluation of the RSC

Rationale: The community should be able to evaluate whether the RSC is improving the review system or unintentionally creating new governance risks.

Implementation steps:

- Commission an independent evaluation after the first year and then at regular intervals.
- Assess transparency, consistency, stakeholder satisfaction, participation diversity, cycle time, and implementation follow-through.
- Publish findings and a management response.

Benefits: Creates a feedback loop and helps refine the RSC before problems become entrenched.

Actors: Reviews CCG or successor body, ICANN Board, independent evaluator, ICANN org.

Timeline: First evaluation after 12 months of operation; recurring every 24 months.

Indicators: Evaluation completed on schedule; recommendations tracked and implemented.

9. Build inclusion safeguards for newcomers, developing economies, and non-English-speaking participants

Rationale: Transparency is only meaningful if information is accessible. Participants from developing economies and newcomers often rely on clear documentation, summaries, predictable timelines, and opportunities to ask questions.

Implementation steps:

- Publish plain-language summaries for each major RSC proposal and final decision.
- Provide webinar briefings across time zones for major consultations.
- Consider translation or interpretation for high-impact consultations where feasible.
- Maintain a newcomer guide explaining how to participate in review consultations.

Benefits: Broadens participation and reduces reliance on informal insider knowledge.

Actors: RSC, ICANN org engagement teams, regional engagement staff, ICANN Learn, community leaders.

Timeline: Plain-language summaries immediately; participation support within 6 months.

Indicators: Participation from multiple regions and stakeholder types; feedback from newcomers; usage of guidance materials.

10. Adopt a public metrics dashboard for review-system performance

Rationale: The reformed system should be evaluated using objective indicators, not only narrative assessments. Metrics should measure both efficiency and governance quality.

Implementation steps:

- Define key performance indicators for the review system and the RSC.
- Track decision publication timelines, consultation participation, deferral duration, implementation status, and stakeholder satisfaction.
- Publish dashboard updates quarterly or semiannually.

Benefits: Allows the community and Board to monitor whether reform is producing intended benefits without weakening accountability.

Actors: ICANN org, RSC, Reviews CCG or successor oversight body, ICANN Board.

Timeline: Metrics framework within 6 months; dashboard within 12 months.

Indicators: Dashboard is public; data is updated; metrics are used in independent evaluation.

Recommendation summary table

No.	Recommendation	Primary Benefit	Suggested Timing
1	Publish detailed decision reports for every major scoping decision	Improves predictability, institutional memory, and trust.	Template within 0-3 months; required use for all major decisions within 3-6 months.
2	Publish agendas, minutes, attendance, and voting or consensus outcomes	Strengthens accountability and prevents the perception that decisions are made informally or without community visibility.	Begin immediately after RSC formation.
3	Require a minimum 30-day public consultation period before major scoping decisions	Encourages broader participation, improves decision quality, and prevents avoidable conflict after decisions are finalized.	Adopt rule within 3 months; apply to all major decisions within 6 months.
4	Require written justification and risk assessment for deferrals, consolidations, and narrowed scopes	Makes trade-offs visible, avoids indefinite deferrals, and gives stakeholders a predictable basis for follow-up.	Risk template within 0-3 months; mandatory use within 3-6 months.
5	Adopt a clear RSC charter, membership model, term limits, and conflict-of-interest rules	Reduces capture risk, improves representativeness, and clarifies accountability for RSC members.	Charter finalized before RSC begins formal decision-making.
6	Establish a lightweight community reconsideration pathway for major RSC decisions	Creates accountability without turning every decision into a formal dispute.	Design within 6 months; pilot during first year.
7	Maintain a searchable public archive and implementation tracker	Improves institutional memory, lowers newcomer barriers, and reduces repeated questions across the community.	Basic archive within 3 months; dashboard enhancements within 6-12 months.
8	Conduct periodic independent evaluation of the RSC	Creates a feedback loop and helps refine the RSC before problems become entrenched.	First evaluation after 12 months of operation; recurring every 24 months.
9	Build inclusion safeguards for newcomers, developing economies, and non-English-speaking participants	Broadens participation and reduces reliance on informal insider knowledge.	Plain-language summaries immediately; participation support within 6 months.
10	Adopt a public metrics dashboard for review-system performance	Allows the community and Board to monitor whether reform is producing intended benefits without weakening accountability.	Metrics framework within 6 months; dashboard within 12 months.

6. Implementation Roadmap

The RSC transparency framework should be implemented in phases so that safeguards are available early while more advanced tools, such as dashboards and independent evaluations, are developed over time. The roadmap below is intended to be practical and proportionate.

Phase 1: Foundation (0-3 months)

- Finalize the RSC charter, mandate, authority boundaries, membership model, and conflict-of-interest rules.
- Adopt standard templates for meeting agendas, minutes, decision reports, and risk assessments.

- Create an initial public archive page for RSC records.
- Publish a plain-language guide explaining how the RSC process works.

Phase 2: Consultation and documentation (3-6 months)

- Apply the 30-day consultation rule to all major scoping decisions.
- Publish first decision reports using the standard template.
- Create a tracker for deferrals, consolidations, narrowed scopes, and future review triggers.
- Pilot webinar briefings for high-impact consultations.

Phase 3: Metrics and inclusion (6-12 months)

- Launch the public metrics dashboard.
- Collect stakeholder satisfaction feedback after consultations.
- Review whether participation is geographically and institutionally diverse.
- Adjust guidance for newcomers and resource-constrained participants based on feedback.

Phase 4: Evaluation and refinement (12-24 months)

- Commission the first independent evaluation of the RSC.
- Publish evaluation findings and a management response.
- Update the RSC charter, templates, and consultation rules if needed.
- Integrate lessons learned into the next review-system cycle.

Minimum reporting framework

At least twice per year, the RSC should publish a consolidated report summarizing decisions taken, consultations held, participation statistics, deferrals, risk assessments, pending implementation items, and lessons learned. This report should be written in a format that is accessible to both experienced ICANN participants and newcomers.

7. Expected Impact and Monitoring Framework

The recommendations in this comment are expected to improve ICANN's review system in four ways. First, they would increase trust by making decision-making visible and understandable. Second, they would improve predictability by giving the community clear timelines and procedural expectations. Third, they would strengthen participation by reducing reliance on informal knowledge and providing accessible entry points for newcomers and developing economies. Fourth, they would support efficiency by reducing repeated debate over process questions and helping stakeholders focus on substantive review outcomes.

A transparent RSC is likely to reduce friction, not increase it. When the community can see the reasoning behind a decision, participants are less likely to assume that review reform is being used to avoid scrutiny. When alternatives and risks are documented, later disagreements can be resolved by reference to the record. When dashboards and archives are maintained, institutional memory improves and future participants can understand how earlier decisions were reached.

Monitoring should cover both efficiency and governance quality. Efficiency indicators alone would be insufficient because a review system can become faster by reducing participation or narrowing accountability. Conversely, governance indicators alone would be incomplete if they ignore volunteer workload and implementation feasibility. The final framework should therefore balance both dimensions.

Suggested indicators

Dimension	Indicator Examples	Reason for Monitoring
Transparency	Percentage of decisions with published reports; publication timeliness; completeness of agenda, minutes, attendance, and outcome records.	Shows whether stakeholders can see and understand RSC decisions.
Accountability	Number of reconsideration requests; response timeliness; percentage of deferrals with risk assessments and future review triggers.	Shows whether decisions can be challenged or corrected when necessary.
Participation	Number and diversity of Public Comment submissions; attendance across time zones; participation by newcomers and underrepresented regions.	Shows whether the process is open beyond experienced insiders.
Efficiency	Average time from scoping proposal to decision; reduction in duplicated review topics; alignment between review recommendations and implementation capacity.	Shows whether the reform reduces burden without reducing accountability.
Quality	Stakeholder satisfaction scores; independent evaluation findings; rate of recommendations accepted and implemented.	Shows whether the review system produces usable institutional improvements.

8. Conclusion

The Review of Reviews Draft Report is a valuable opportunity to make ICANN's review system more coherent, sustainable, and effective. I support the objective of modernization and recognize the need to reduce duplication, improve scheduling, and better align reviews with implementation capacity. However, reform will only succeed if it preserves the legitimacy of ICANN's accountability system.

The RSC should be designed as a transparent and accountable governance body, not merely an internal coordination mechanism. Because it will influence review initiation, scope, timing, and feasibility, its procedures should be clear, public, consistent, and open to meaningful community input. Strong safeguards are especially important for newcomers, developing economies, and participants who rely on public documentation to follow ICANN processes.

I respectfully encourage the Reviews CCG and the ICANN Board to incorporate stronger transparency and accountability requirements into the final Review of Reviews framework. A transparent RSC will strengthen community trust, improve decision quality, reduce avoidable disagreement, and reinforce ICANN's multistakeholder model. Efficiency and accountability should not be treated as competing objectives. With the safeguards recommended in this comment, ICANN can achieve both.

Appendix A - Stakeholder Matrix

Stakeholder	Primary Interest	RSC-Related Need	Suggested Engagement
ICANN Board	Ensure that the review system supports accountability, transparency, and effectiveness while remaining feasible.	Needs clear evidence, risk assessment, and community support before approving major structural changes.	Board briefing with published rationale.
Reviews CCG or successor body	Guide the reform process and maintain community legitimacy.	Needs documentation showing how community feedback is reflected in the final framework.	Formal review and sign-off of governance safeguards.
Review Scoping Committee (RSC)	Coordinate scoping, timing, feasibility, and prioritization of reviews.	Needs a clear mandate, decision rules, publication obligations, and evaluation criteria.	Public meetings, published records, and evaluation.
ICANN org	Provide operational support, staffing, data, implementation tracking, and publication infrastructure.	Needs predictable templates, timelines, and resource expectations.	Operational support and dashboard maintenance.
Supporting Organizations and Advisory Committees	Ensure reviews respect community roles and do not create unsustainable workload.	Need consultation opportunities and clarity about how review outcomes affect them.	Consultation before major scoping decisions.
Review teams and independent evaluators	Conduct focused, evidence-based review work.	Need clear scope, access to information, and well-defined success criteria.	Clear terms of reference and access to materials.
Newcomers and individual contributors	Participate without needing extensive informal knowledge.	Need plain-language summaries, clear archives, and accessible participation channels.	Beginner-friendly guides and summaries.
Developing economies and underrepresented regions	Ensure review decisions reflect global participation needs and capacity constraints.	Need reasonable timelines, time-zone accessibility, and inclusive engagement support.	Regional briefings and accessible timelines.
Technical community and contracted parties	Ensure review scope is technically realistic and operationally relevant.	Need evidence-based scoping and clarity on implementation impacts.	Technical feasibility input and implementation review.

Appendix B - Risk Matrix

Risk	Description	Severity	Mitigation
Opacity risk	RSC decisions are made without enough public explanation.	High	Require decision reports, minutes, public archive, and consultation summaries.
Capture risk	A small group of experienced insiders dominates scoping decisions.	High	Use diverse membership, term limits, conflict declarations, and recusal rules.
Over-bureaucratization	Safeguards become too heavy and slow down routine administrative work.	Medium	Apply proportionality: lighter rules for routine matters, stronger rules for major decisions.
Deferral without accountability	Reviews are repeatedly deferred without clear future trigger.	High	Require risk assessments, expiration dates, and reconsideration points.
Exclusion of newcomers	Processes depend on informal knowledge rather than public documentation.	High	Publish plain-language summaries, guides, and searchable archives.

Risk	Description	Severity	Mitigation
Data quality problems	RSC decisions rely on incomplete or inconsistent evidence.	Medium	Require evidence summaries and document data limitations.
Resource burden	ICANN org or volunteers cannot maintain new documentation requirements.	Medium	Use standardized templates and integrate publication into ordinary meeting workflows.
Legitimacy loss	Community perceives reform as reducing accountability.	High	Adopt consultation, reconsideration, independent evaluation, and transparent reporting.

Appendix C - Proposed RSC Decision Workflow

1. Issue identification: A review need, deferral question, consolidation proposal, or scoping concern is identified by the community, ICANN org, the Board, or the RSC.
2. Initial evidence note: ICANN org support staff prepare a short evidence note summarizing previous reviews, implementation status, resource implications, and known stakeholder concerns.
3. RSC preliminary assessment: The RSC reviews the evidence note and determines whether the issue is routine or major. Major decisions trigger enhanced consultation.
4. Publication of proposed action: The RSC publishes the proposed action, rationale, alternatives considered, risk assessment, and consultation questions.
5. Public consultation: The community receives at least 30 days to comment on major scoping decisions, with webinars or briefings for high-impact decisions.
6. Deliberation and documentation: The RSC reviews public input and prepares a decision report explaining how comments were considered.
7. Final decision and archive: The final decision, supporting materials, minutes, and any minority views are published in the archive and linked to the dashboard.
8. Reconsideration window: Stakeholders may request limited reconsideration based on procedural flaws, missing evidence, or material new information.
9. Implementation and monitoring: The RSC or relevant implementing body tracks follow-up actions, deadlines, responsible actors, and review triggers.
10. Evaluation: Decisions and process performance are reviewed in periodic independent evaluations.

Appendix D - Glossary

Term	Meaning
ATRT	Accountability and Transparency Review Team, a form of Specific Review focused on ICANN accountability and transparency.
CCT Review	Competition, Consumer Trust, and Consumer Choice Review, historically related to the expansion of the generic top-level domain space.
ICANN	Internet Corporation for Assigned Names and Numbers, the nonprofit public-benefit corporation coordinating key Internet identifier systems.
Multistakeholder model	A governance model in which governments, businesses, civil society, technical experts, end users, and other stakeholders participate in decision-making.
Organizational Review	A review of the performance and operation of ICANN Supporting Organizations, Advisory Committees, and related structures.
Public Comment	A formal ICANN mechanism for stakeholders to submit views and recommendations into the public record.
Review of Reviews	The current initiative to assess and refresh ICANN's overall review system.

Term	Meaning
RSC	Review Scoping Committee, the proposed body that would coordinate review scoping, timing, feasibility, and resource considerations.
SSR Review	Security, Stability, and Resiliency Review, a Specific Review focused on the DNS and ICANN's related responsibilities.
Specific Review	A review anchored in ICANN accountability commitments and conducted to assess ICANN performance in key areas.

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