Review of Reviews Second Draft Report

Individual Internet End-User Perspective and Observer Comments

ICANN Review of Reviews Cross Community Group (Reviews CCG) | Second Draft Report, 12 November 2026

Overall assessment

As an individual Internet end user and observer of the Review of Reviews Cross Community Group (CCG), I recognize the substantial effort to modernize ICANN's system of reviews, improve efficiency, reduce duplication, and strengthen accountability.

I generally support these objectives. However, I believe the proposed framework should be evaluated not only on its administrative efficiency but also on **whether it preserves meaningful accountability to individual Internet users, protects the public interest, and maintains the effectiveness of ICANN's multistakeholder model.**

The following observations distinguish between improvements I recognize in the Second Draft and safeguards that, in my opinion, still require clarification or reinforcement before the Final Report.

Main concerns and observations

1. Preserve the specific role of ALAC and At-Large in representing individual Internet users.
The responsibilities of ALAC are already established under ICANN Bylaws, Section 12.2(d). ALAC is the primary organizational home for individual Internet users and provides advice concerning their interests.

ICANN
I am not proposing that the report redefine this responsibility. However, I recommend that its operational framework explicitly acknowledge that SOs and ACs have different mandates, and that the interests of individual Internet users must be considered when determining review priorities. Appendix D (p. 54) acknowledges comments requesting consideration of end-user effects but prefers a broad definition. I accept that approach provided end-user considerations are reflected in review scoping and evaluation criteria.

2. Avoid weakening Security, Stability and Resiliency (SSR) and Registration Directory Services (RDS) accountability.
I welcome the establishment of three dedicated scoping categories within the five-year Accountability and Transparency Review (ATR): Accountability and Transparency, SSR, and RDS. However, Section 4.1.1.4 (p. 13) states that no topic must be selected from each category.

This creates the possibility that an ATR could proceed without substantively examining SSR or RDS issues. I recommend retaining a documented, evidence-based minimum assessment of these areas during every ATR cycle, even when a full review is not warranted.

3. Ensure that the On-Demand Review Framework remains accessible to end-user concerns.
Section 4.2.2.4 (pp. 30–31) requires support from at least two SOs/ACs to initiate an On-Demand Review proposal and endorsement from five of seven SOs/ACs before proceeding. Although intended to prevent unnecessary reviews, these thresholds may disadvantage important issues identified by individual Internet users or smaller community groups. I recommend a documented mechanism allowing individuals to submit evidence-based concerns for preliminary evaluation and a proportionate escalation procedure for significant security, privacy, consumer-harm, or other identifier-related public-interest issues. Individuals should not need to demonstrate broad institutional support simply to have a concern examined.

4. Prevent the Reviews Scoping Committee (RSC) from becoming an unintended gatekeeper.
I recognize the improvement in Section 3, which explicitly establishes the RSC as a coordinating and facilitating body without decision-making authority. Nevertheless, the RSC will substantially influence which topics advance through its feasibility assessments, prioritization, and resource considerations. I recommend requiring published reasons for excluding or deprioritizing topics, appropriate conflict-of-interest safeguards, disclosure of dissenting positions, and a clear process for reconsidering rejected proposals. The RSC should facilitate accountability, not inadvertently restrict access to it.

5. Reconsider the long interval between Structural Reviews.
Section 4.1.2 proposes a 15-year Structural Review cycle. I appreciate the adjustment allowing the first Structural Review to begin 24 months after the first ATR begins, but subsequent cycles remain lengthy. Changes in participation, technologies, organizational relationships, and the effectiveness of the multi-stakeholder model may develop much faster. I recommend introducing periodic, lighter structural health assessments, with measurable indicators that can trigger an earlier targeted review when necessary. Examples include declining community participation, persistent accountability problems, or material changes affecting the SO/AC structure.

6. Clarify the relationship between the Continuous Improvement Program (CIP) and Organizational Reviews.
Section 4 (p. 10) describes Organizational Reviews under Bylaws Section 4.4 as superseded by the CIP pilot for purposes of the proposed system. However, Section 6 (p. 46) appropriately recognizes that the pilot's success should not be presumed and recommends a standalone assessment. These positions require clearer reconciliation. I support evaluating the CIP, but recommend that existing Bylaws obligations remain clearly distinguished from proposed future amendments. The CIP assessment should examine independent verification, participation, transparency, measurable improvement, and whether the process provides accountability equivalent to the organizational review arrangements it would replace.

7. Protect independent findings in Structural Reviews.
Section 4.1.2.2 (pp. 22 and 27) proposes that recommendations directed at an existing SO or AC can enter the final report only if accepted by that SO or AC. I recognize the importance of respecting organizational responsibilities and avoiding externally imposed structural changes. However, this arrangement could allow an organization under review to prevent valid critical recommendations from reaching final consideration. I recommend that all evidence-based findings and recommendations remain publicly documented, including those not accepted by the affected organization, along with its rationale. Publication should not imply that a rejected recommendation is binding.

8. Ensure substantive participation by observers and individual Internet users.
The proposed Community Review Teams are open to observers, but their leadership determines whether and how observers may participate in discussions. I appreciate that observers can attend meetings and follow mailing lists. Nevertheless, meaningful participation requires more than observing. I recommend clear minimum participation opportunities, advance publication of working documents, accessible and multilingual consultation mechanisms, and documented responses to substantive observer contributions. These safeguards should support input from unaffiliated individuals as well as established community participants. The distinction between observing and influencing deliberations is particularly important from an end-user perspective.

9. Maintain meaningful consumer trust and user-experience assessments in the new gTLD framework.
I welcome the standalone review addressing aspects of the 2026 new gTLD round, scheduled two years after its first delegation. However, I remain concerned that future rounds would not automatically trigger equivalent reviews. Section 5 (pp. 40–45) should more explicitly identify mechanisms for gathering evidence about the experiences of registrants and individual Internet users. Within ICANN's mandate, relevant subjects could include DNS abuse mitigation, consumer trust, registration-related accessibility, Internationalized Domain Names (IDNs), and Universal Acceptance of domain names and email addresses. These should be evaluated through measurable technical outcomes and documented user experiences, rather than awareness activities alone.

10. Establish an earlier checkpoint for reviewing the effectiveness of the new review system itself.
Section 4.1.1.2 (p. 12) makes consideration of whether a new Review of Reviews is needed a standing ATR assessment only from the second ATR under the revised framework onward. I question whether ICANN should wait that long to evaluate a substantially redesigned system. I recommend requiring an initial effectiveness assessment during the first ATR cycle. It should examine whether review topics are being appropriately selected, whether the thresholds are workable, whether concerns from individuals are receiving attention, and whether the RSC is operating within its intended responsibilities.

11. Ensure that resource constraints do not undermine accountability.
I recognize the need for realistic budgets, capacity assessments, and relief from review fatigue. The dedicated review budget lines proposed in Section 4 are positive steps. However, financial feasibility should not become an automatic reason to disregard significant accountability

concerns. For example, Section 4.1.1.6 (p. 19) would prevent initiating another On-Demand Review while an ATR with separate sub-review teams is operating. I recommend a narrowly defined exception for urgent, well-evidenced matters, accompanied by transparent decisions on prioritization and resources.

12. Make implementation effectiveness, not simply completion, the measure of success.
I support retaining public implementation dashboards, annual reporting obligations, and the proposed Implementation Review Teams (IRTs). However, accountability requires more than reporting whether recommendations were marked completed. I recommend that dashboards identify responsible parties, target dates, implementation status, costs where appropriate, reasons for delay, and evidence demonstrating that the intended improvement was achieved. This is particularly important for recommendations intended to increase transparency, participation, security, and trust.

Additional clarification before the Final Report

One drafting issue deserves attention. Sections addressing Board consideration of future Community Review Team and Structural Review Team recommendations (pp. 20, 28 and 34) refer to consultation with the *Reviews CCG* when agreement cannot be reached.

It is unclear whether this means the present, temporary Reviews CCG or the relevant future review team. I recommend identifying the appropriate consultation body explicitly. The proposed system must remain workable after the current CCG completes its assignment.

Final reflection

My position is not that ICANN should retain every existing review in its current form. The current framework has demonstrated significant limitations, and I support a simpler, more coordinated, and sustainable approach.

However, I would encourage the Reviews CCG to ensure that an improved review system is evaluated by its tangible outcomes, including whether ICANN responds effectively to legitimate community concerns and implements recommendations that deliver measurable improvements.

From my perspective as an individual end user and observer, the Second Draft is a meaningful improvement over the earlier proposal. I recognize particularly the refinements involving the RSC, SSR and RDS scoping, deferral limitations, review-team transparency, and implementation oversight.

I support advancing the proposed framework, provided the remaining safeguards are appropriately addressed and reflected in the Final Report or its binding implementation instruments.

Ultimately, the effectiveness of ICANN's review system should not be measured by how many reviews it eliminates, but by how well the resulting system preserves accountability, earns public trust, and responds to the interests of those who depend on the Internet.

These are individual observations intended to inform the CCG's consideration of the Second Draft.