



Caribbean
Telecommunications
Union

Feedback and Recommendations from the
Caribbean Telecommunications Union on the

Governance Document for the Recognition, Operation, and
Derecognition of Regional Internet Registries
(RIR Governance Document)
Version 2 (DRAFT)

Date: 7th November 2025

Introduction

The Caribbean Telecommunications Union (CTU) extends its appreciation for the opportunity to review the second revision of the RIR Governance Document. The CTU recognises that the suggestions and perspectives of regional and global stakeholders have been carefully considered in this revision and welcomes the inclusive approach taken in developing this updated framework. The revision provides significant improvement in transparency, procedural definition, and governance alignment, which are critical to maintaining stability and trust within the global Internet ecosystem. In support of further strengthening the policy document and its accessibility, the CTU respectfully proposes the following considerations for incorporation in the final draft. A slightly “marked up” version of the RIR Governance Document Version 2 is also submitted herewith showing comments in context.

Document Structure

The CTU commends the clarity and comprehensiveness of the document. However, in terms of its structure, it seems a bit strange to locate detailed procedures for Recognition and Derecognition under Article 2: Internet Numbers Registry System and then follow this with Articles 3 and 6 which specifically deal with Recognition and Derecognition respectively. Given that there are articles specifically dedicated to Recognition and Derecognition, it seems logical to remedy this redundancy by relocating the relevant detailed procedures (most of section 2.3) under those respective articles. Section 2.4 on Ad Hoc Audits could also be relocated to where Audits are addressed under Article 4: Ongoing Commitments.

Such changes would make Article 2 simpler and more consistent with its title, which portends a general overview of the system rather than any detailed procedures. In addition, it would be useful to mention in Article 2 the existing RIRs, possibly under section 2.2 Service Region. This would illustrate the current system and identify those RIRs not now subject to the Recognition requirements.

Responsibilities of Existing RIRs under the Document

Existing RIRs are called upon to undertake evaluations and decisions throughout the document. In any of these proceedings, are they allowed to abstain or are they required to make a ruling? If the former, then such eventualities need to be taken into account in the procedures. If the latter, the language of the document should make this clear.

Clarification on Audit Outcomes and Continuity Measures

Article 4 outlines the commitments and responsibilities of RIRs and provides for an audit process to assess compliance. However, the document does not explicitly state the course of action should audit outcomes prove unsatisfactory. Would such a finding automatically trigger the emergency continuity provisions referenced in Article 5, or would an intermediate remediation process first be pursued? This clarification would ensure procedural transparency and reinforce accountability mechanisms.

Additional Recommendations for Inclusion in the RIR Governance Document

1. Inclusion of a Table of Contents

The addition of a table of contents is recommended to enhance the document's usability and facilitate efficient navigation across its sections. This would be particularly beneficial for policymakers, regulators, and technical stakeholders who may need to reference specific provisions quickly.

2. Ownership and Authentication Indicators

The CTU notes the absence of ownership or authentication elements within the document. It is suggested that the final version include clear indicators such as a publication date, version control reference, and issuing authority details. These elements would authenticate the document as the definitive and official policy instrument.

Conclusion

The CTU reiterates its appreciation for the diligent work undertaken in revising the ICP-2 and looks forward to continued collaboration in strengthening the global coordination framework for Regional Internet Registries.