

Joint Submission by the European Commission, Germany, the Netherlands, Denmark, Portugal, Spain and Italy

Public Comment on the Second Draft of the RIR Governance Document

This joint submission is presented by the European Commission, the Federal Republic of Germany, the Kingdom of the Netherlands, the Kingdom of Denmark, the Portuguese Republic, the Kingdom of Spain and the Italian Republic in response to the Second Draft of the RIR Governance Document.

Executive Summary

The European Commission, Germany, the Netherlands, Denmark, Portugal, Spain and Italy welcome the publication of the Second Draft of the RIR Governance Document and commend the Address Supporting Organization (ASO), the drafting team, and ICANN staff for the transparent and inclusive process that has led to clear improvements over the first version.

The new draft strengthens the governance of RIRs by clarifying recognition and derecognition procedures, enhancing accountability and transparency, and introducing structured audit and rehabilitation mechanisms. These steps mark genuine progress toward a more predictable and resilient framework for the stewardship of Internet number resources.

Building on this positive evolution, we submit three focused recommendations to further consolidate the system's integrity, legitimacy, and economic sustainability.

Comments and Recommendations

1. Addressing IPv4 Market Speculation and Promoting IPv6 Deployment

Speculative hoarding, trading, and leasing of IPv4 addresses distort the intended public-interest function of RIRs and undermine fair access to Internet resources.

To address this structural risk, we propose the following language for inclusion **in section 4.1 (after j)** of the Governance Document:

“Each RIR shall operate its Number Resource policies in a manner that discourages speculative hoarding, trading, and leasing and promotes efficient utilization, including by actively supporting the transition to and deployment of IPv6, ensuring transparency and accuracy in transfers and registration data, thereby ensuring that the allocation of Number Resources serves the stability and openness of the global Internet.”

This addition would introduce a normative safeguard against speculative accumulation while reaffirming IPv6 as the definitive technical and economic solution to scarcity.

Deployment of IPv6 is a **priority for the European Union**, which is engaging public and private stakeholders through dedicated multistakeholder policy actions to accelerate its adoption. Broad IPv6 deployment reduces artificial scarcity, restores address distribution to a **cost-oriented, service-driven market dynamic**, and enhances the efficiency and resilience of Internet infrastructure worldwide.

2. Decision-Making Thresholds for Recognition or Derecognition of an RIR

We support that the approval of recognition or derecognition of an RIR (section 2.3) is subject to an appeal process in case unanimity amongst recognized RIRs is not achieved.

However, in situations where a derecognition is triggered because a recognized RIR is no longer deemed able or competent to make a decision, an appeal process would add additional time in resolving such matters.

Therefore, we recommend re-assessing the threshold requirement recognition or derecognition and consider a qualified majority, e.g. setting a maximum number dissenting recognized RIRs. Further such decision, regardless of the outcome, should subject to appeal by any affected party.

3. Clarifying the Consultative Role of Governments

Governments have historically been consulted in previous processes of recognition, including those conducted under earlier ICP-2 frameworks. While decision-making authority remains within the multistakeholder community, ICANN should clarify—during the implementation phase—how affected governments and other stakeholders will be **consulted** in recognition and derecognition procedures. Such clarification would enhance transparency, preserve institutional coherence, and reflect the multistakeholder character of ICANN without altering established governance balances.

Conclusion and Forward Outlook

The European Commission, Germany, the Netherlands, Denmark, Portugal, Spain and Italy reiterate their strong support for the ASO and ICANN's work in modernising the RIR governance framework. The Second Draft demonstrates significant progress toward a transparent, accountable, and future-proof model that safeguards the stability of global Internet number resource management.

We encourage the ASO to maintain this constructive momentum, engage openly with the GAC and other stakeholders, and consider the targeted improvements proposed above. Together these

measures would ensure that the RIR governance framework continues to serve the global Internet community in line with the principles of openness, accountability, and multistakeholder cooperation.