

ICANN

Address Supporting Organization

In response to: Second Draft RIR Governance Document**Our ref:** 25-049

Netnod welcomes the opportunity to provide feedback on the draft *Governance Document for the Recognition, Operation, and Derecognition of Regional Internet Registries (RIR Governance Document) Version 2*.

Netnod is firmly committed to the multi-stakeholder governance staked out in the draft document. The RIR system should to a large extent be self-governed with accountability structures within the larger Internet coordination ecosystem. However, it is vital that an external observer can understand and to a lesser extent verify the accountability mechanisms of the system, as to avoid untoward interference of the numbering mechanisms of the Internet.

Netnod supports the Second Draft of the RIR Governance Document.

Please see the attached paper for further motivations and elaborations.

A handwritten signature in blue ink, appearing to read "Patrik Fältström".

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Attachment 1 - Detailed comments

Netnod's role and the broader context

Netnod is a for-profit corporation wholly owned and controlled by the non-profit foundation *Stiftelsen för Telematikens utveckling (the TU-foundation)*. The TU-foundation works to improve the Internet in Sweden and the Nordic countries through corporate ownership and/or research funding. Netnod is one of the twelve designated root server operators, managing *i-root*. Additionally, Netnod operates internet exchanges in the Nordics, provides global secondary DNS services, and is commissioned by the Swedish state to distribute Swedish time in a GNSS-independent manner.

We acknowledge and support the foundational approach taken by the RIR Governance Document, particularly its adherence to the multi-stakeholder model for Internet coordination and governance. The governance document asserts that the global system for managing Internet Number Resources is a decentralized and coordinated system based on open and bottom-up processes.

Drawing upon our perspective on governance structures for core Internet functions, particularly the discussion regarding the Root Server System Governance Structure, we offer the following commentary regarding accountability and implementation within the Internet Numbers Registry System.

Accountability and Transparency

The longevity of any governance structure for core Internet functions, including the coordination of Internet Number Resources (such as IPv4, IPv6, and ASNs), is intrinsically linked to its acceptance in the wider global context.

The RIR Governance Document states a goal to "*Ensure Accountability to the Global Internet Community*" and commits RIRs to operating in an open, neutral, and transparent manner. However, accountability mechanisms must also unequivocally reassure external observers, including political and corporate actors who are not direct constituents, that the system functions effectively.

We observe, in the context of broader Internet coordination, that the increasing demands of nation-states and large corporations pose a threat to the Internet's open form. Governance structures, such as the RIR Governance Structure document, must meticulously demonstrate their adherence to the multi-stakeholder model to preserve the globally unique public number space.

Therefore, while the document introduces robust accountability measures, such as the Ad Hoc Audit process, it must be abundantly clear how these mechanisms satisfy the concerns of nation states and large for-profit entities seeking control or influence. Transparency regarding adherence to operational requirements and stability standards is essential to manage perceived risks from external global influences.

Implementation of Structure and Organization

The draft document details operational requirements and procedures for recognition, operation, and derecognition of RIRs. It establishes that RIRs and ICANN may jointly develop Implementation Procedures to give effect to certain provisions, while leaving discretion to individual RIRs for internal operational approaches.

We believe that the mechanisms against capture and disproportionate control are relevant and balanced, and are aligned with the larger goal of an open Internet.

Specifically, the required rectification process, where an RIR must bring its practices into compliance with the RIR Governance Document, must ensure that these new obligations harmonize with the fundamental values of the Internet, such as unique number- and namespaces. Compliance procedures should avoid becoming overly onerous administrative burdens, which could hinder participation, particularly reflecting the caution necessary when formal control and compliance interacts with the open, bottom-up design valued by the Internet community.

Concluding remarks

Netnod appreciates the comprehensive efforts by the community to develop the RIR Governance Document. The document reinforces critical elements, such as maintaining an open, transparent, multi-stakeholder, and bottom-up processes. However, it is paramount that mechanisms of accountability and implementation are designed to manage special interests while strictly preserving the multi-stakeholder coordination philosophy that has ensured the Internet remains open and universally accessible.

We urge continued attention to how the technical coordination of naming and numbering—the least common identifiers of the Internet—can be protected from external political and commercial pressures, ensuring the Internet remains an architecture and communication network coordinated through multi-stakeholder mechanisms.