

Tucows public comment: Consultation on the Second Draft of the “Governance Document for the Recognition, Operation, and Derecognition of Regional Internet Registries”

7 November 2025

Tucows welcomes the opportunity to comment on the second draft of the Governance Document for the Recognition, Operation, and Derecognition of Regional Internet Registries (“RIR Governance Model”) and appreciates the Number Resource Organization (NRO) Executive Council’s, the NRO Number Council’s, and the Address Supporting Organization Address Council’s work throughout the drafting process and their consideration of the input offered to the first consultation.

The RIR Governance Model appropriately resolves recent concerns regarding gaps in the current model but we see areas for improvement with regard to truly involving all relevant stakeholders and centering multistakeholderism and the bottom-up process.

Beneficial updates in the Governance Document

Tucows views the Regional Internet Registry (RIR) system as fundamental to the Internet and the DNS, including to the functioning of domain names. Recent events raised concerns with regard to the management of fundamental Internet assets. We are confident that these recommended rules and criteria, in conjunction with the creation of guiding principles to outline the expectations of RIRs in the ecosystem, will ensure that the stability, effectiveness, and longevity of RIRs is maintained across the global Internet.

We welcome the ASO’s recent review as the Internet Coordination Policy-2 (ICP2) has existed for a considerable time without formal review. Work towards modernizing this document will ensure that there is more clarity, transparency, accountability, and procedural flow with regard to the operation, recognition, and derecognition of RIRs.

The Governance Document introduction of a role for ICANN to jointly develop procedures and facilitate emergency continuity arrangements for RIRs facing difficulties is crucial and we recognize the care and effort involved in including this revision. Tucows applauds this change and understands that ICANN’s intervention is exclusively to be used for exceptional circumstances, which has recently been shown to be beneficial, improving the security and stability of the global Internet.

Updates to the requirement for unanimous recognition of a Candidate RIR, which now includes a review process available to rejected candidates conducted by an independent third party, is also a welcomed and necessary revision.

Room for improvement to ensure multistakeholder involvement

The proposed changes to ICP2 suggested in the new Governance Document demonstrate a laudable commitment to the global Internet. However, it is concerning to us that the Governance Document only guarantees resource holders a voice in formal governance decisions. Other stakeholders, including governments, civil society, academics, technical experts, and individual Internet users—each of whom is directly affected by the decisions of their local RIR—are only recognized as part of a broader “Number Community”. To assure true community-driven and bottom-up multistakeholderism, Tucows strongly recommends that the final document make clear whether and how non-resource holders are expected to be included in RIR governance. The currently-recommended implicit member-only role in RIR governance creates a tension if the goal is to have the RIR system governed according to the multistakeholder model. Tucows is a strong believer in the multistakeholder model and both its usefulness and necessity when addressing the needs of public resources like the Internet and the distribution of resources that those RIRs manage.

The Internet is too important to allow those who can contribute to its governance to be so constrained. This is as true of RIRs as of any other Internet resource. When providing the clarity we recommend here, it will be necessary to be explicit about how people can participate, even if voting itself remains tied to resource holders. We trust that the ASO will take these comments into account and develop a workable strategy that will preserve the multistakeholder model and allow community-driven decisions.

Conclusion

Tucows again thanks the NRO’s Executive Council, the NRO Number Council, and the ASO Address Council for their work on this necessary and important revision to RIR governance and looks forward to seeing the successful results of the proposed changes and to updated revisions that will maintain trust in the fundamental work conducted by RIRs.

Thank you,

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