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AT-LARGE ADVISORY COMMITTEE
Second Draft of the RIR governance Document

Preamble

On 28 August, the Public Comment proceeding opened for the Second Draft of the RIR governance Document. An At-Large workspace was created in preparation for this Public Comment submission. The At-Large Operations, Finance and Budget (OFB WG) reviewed the Second Draft of the RIR governance Document and decided it would be in the interest of end users to develop and submit an ALAC Public Comment Statement.

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Ratification Record

On 28 August, the Public Comment proceeding opened for the Second Draft of the RIR Governance Document. On 11 September, Claire Craig, Hadia Elminiawi, Pari Esfandiari, Maureen Hilyard, and Satish Babu discussed the comments for the ALAC statement during the OFB-WG call. The At-Large OFB-WG decided it would be in the interest of end users to develop and submit an ALAC statement for this Public Comment proceeding. Claire Craig, Hadia Elminiawi, Pari Esfandiari, Maureen Hilyard, and Satish Babu volunteered to draft the initial ALAC statement for OFB-WG consideration and ALAC endorsement.

On 18 September, under the lead of Pari Esfandiari, with support from Maureen Hilyard, Claire Craig, and Satish Babu, the team commenced preparing points for the OFB-WG’s consideration and initiated the drafting of a possible Public Comment for ALAC endorsement.

On Sep 25th, the initial draft statement was shared with the OFB-WG for review and input. On 2 October, the At-Large Public Comment Statement was finalized. The ALAC Chair, Jonathan

Zuck, requested that the Public Comment Statement be ratified by the ALAC before submission to the ICANN Public Comment feature.

On 20 October, staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 out of 15 votes in favor 0 votes against, and 0 abstentions. Please note 100 % of ALAC members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): Aziz Hilali, Bukola Oronti, Claire Craig, Eunice Alejandra Perez Coello, Emilia Zalewska-Czajczynska, Jonathan Zuck, Judith Hellerstein, Justine Chew, Kathleen Scoggin, Lilian Ivette De Luque, Natalie Tercova, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu, Shah Zahidur Rahman. You may view the results here:

The ALAC has been asked to vote on the "ALAC Statement on Second Draft of the RIR Governance Document". Do you agree with this Statement?			
Total Voters:15			
Choice 🗳️	View Raw Votes 🗳️	Votes	Percentage 🗳️
Yes		15	100.00%
No		0	0.00%
Abstain		0	0.00%

Executive Summary

The At-Large Advisory Committee (ALAC) welcomes the improvements in the second draft of the *RIR Governance Document*, particularly those addressing ICANN's emergency role, audit timelines, and rehabilitation procedures. These updates reflect meaningful progress toward clearer and more accountable RIR operations.

However, the ALAC remains concerned that some core issues remain unaddressed. Specifically, the document lacks:

- Transparency and accountability requirements for sub-regional registries;
- Guarantees of regional representation in the handoff process following RIR derecognition.

These gaps have real-world implications for end users, particularly in underserved regions. The ALAC urges the ASO to address these areas to ensure the governance framework is truly inclusive, resilient, and aligned with multistakeholder principles.

ALAC and At-Large Community Comments

The At-Large Advisory Committee (ALAC) welcomes the release of the second draft of the *Governance Document for the Recognition, Operation, and Derecognition of Regional Internet Registries* (RIRs). We recognize and appreciate the significant progress made in strengthening

transparency, audit mechanisms, and emergency powers in response to public comment and community feedback.

We thank the drafting team for incorporating several important changes aligned with the ALAC's previous submission, including:

- ICANN's limited authority to initiate derecognition under emergencies (2.3).
- A minimum 3-year audit cycle and ad hoc audit triggers (4.2).
- Enhanced transparency in the rehabilitation process, with community feedback and public reporting (5.2).
- A shift from 10-year to 5-year review cycles (7.3).

These developments represent meaningful steps forward in making the RIR framework more resilient, accountable, and community-focused and contribute to institutional trust and end-user accountability.

While the ALAC no longer insists on changes to earlier recommendations regarding language use, RIR quantity, or membership definitions—recognizing these may be better addressed regionally—it urges the ASO and ICANN community to revisit the following:

Outstanding Concerns and Key Recommendations

1. Accountability of Sub-Regional Registries (Section 2.6)

The current draft leaves full discretion to RIRs in creating and managing sub-regional registries, but does not include minimum requirements for transparency or community oversight.. While sub-regional entities are accountable to their RIRs through bottom-up processes, practices may vary widely across regions.

The **ALAC therefore recommends introducing baseline safeguards**—such as transparency, fairness, and community consultation—that would **apply consistently to all delegated functions, while still allowing each RIR to determine the details**.

2. Regional Continuity in Handoff Scenarios (Section 6.3(a))

The updated draft introduces continuity and redundancy procedures, including the designation of an Emergency Operator to temporarily take over RIR functions in the event of failure. This is a positive step that provides a vital safety net to ensure uninterrupted services for users.

However, **ALAC stresses that continuity of services is not the same as continuity of trust**. The current draft does not address how the RIR community will be involved during such transitions, nor does it prioritize regional expertise or legitimacy in successor or interim arrangements. To safeguard both technical stability and community confidence, ALAC recommends that the governance document:

- Include mechanisms for community consultation and transparency during the transition period; and
- Wherever feasible, prioritize regional expertise and continuity when selecting interim or successor entities.

This would ensure that while the Emergency Operator keeps the Internet running, the process also preserves local trust, legitimacy, and alignment with community needs.

End-User Impact

The updated second draft of the *Governance Document for the Recognition, Operation, and Derecognition of RIRs* continues to raise important questions for the global end-user community. As the body representing user interests within ICANN, the ALAC believes it is critical to remain actively engaged in shaping this foundational framework.

Regional Internet Registries (RIRs) allocate and manage IP address resources—essential infrastructure for Internet connectivity. Their operation affects not only technical coordination but also the availability, fairness, and resilience of Internet access, especially in regions vulnerable to governance or infrastructure instability.

This second draft makes notable progress, incorporating several ALAC recommendations, including those related to emergency derecognition mechanisms, improved auditing, and clearer rehabilitation procedures. These improvements enhance accountability and help prevent systemic failures that can harm end-users.

However, some areas remain unresolved. Issues such as the transparency of sub-regional delegations and ensuring equitable successor arrangements in cases of derecognition still lack sufficient clarity or safeguards. These gaps are not abstract—they have real consequences for how IP resources are governed, particularly in contested or underserved regions.

By contributing to this consultation, ALAC continues to advocate for inclusive, transparent, and resilient RIR governance. Our role is to ensure that end-user interests are embedded in the institutional DNA of the Internet's infrastructure—not as an afterthought, but as a guiding principle.