

EN



AL-ALAC-ST-0426-01-00-EN
ORIGINAL: English 2026
DATE: 13 April
STATUS: Ratified

AT-LARGE ADVISORY COMMITTEE
ALAC Statement on “Standard Bylaws Amendment -
Transition Article on Specific Reviews”

Preamble

On 11 February 2026, the Public Comment proceeding opened for the Standard Bylaws Amendment - Transition Article on Specific Reviews. An At-Large workspace was created in preparation for this Public Comment submission. The Operations, Finance and Budget (OFB-WG) reviewed the public comment and decided it would be in the interest of end users to develop and submit an ALAC Public Comment Statement.

Preamble.....1
Ratification Record.....1
ALAC and At-Large Community Comments..... 2

Ratification Record

On 11 February 2026, the Public Comment proceeding opened for the Standard Bylaws Amendment - Transition Article on Specific Reviews. On 26 March 2026 and 2 April 2026, Justine Chew, Claire Craig and Alfredo Calderon discussed some points for an ALAC statement during the OFB-WG calls. 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. Justine Chew, Claire Craig, Maureen Hilyard and Alfredo Calderon volunteered to begin drafting the initial ALAC statement for OFB consideration and ALAC endorsement.

On 2 April 2026, the initial draft statement was shared with the OFB-WG for further discussion and input. On 6 April 2026, the draft statement was shared with the OFB-WG for final review. On 10 April 2026, 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 13 April 2026, staff confirmed the online vote resulted in the ALAC endorsing the statement with 12 out of 15 votes in favor. 0 votes against, and 0 abstentions. Please note 80% of ALAC members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): Adebunmi Akinbo, Aftab Siddiqui, Aziz Hilali, Claire Craig, Eunice Alejandra Perez Coello, Judith Hellerstein, Justine Chew, Kathleen Scoggin, Natalie Tercova, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu. You may view the results here: [link to vote results].

The ALAC has been asked to vote on the Standard Bylaws Amendment – Transition Article on Specific Reviews			
Total Voters:15			
Choice 🗳️	View Raw Votes 🗳️	Votes	Percentage 🗳️
Yes		12	100.00%
No		0	0.00%
Abstain		0	0.00%

ALAC and At-Large Community Comments

The ALAC and At-Large Community very much appreciate this opportunity to understand and comment on the proposed Standard Bylaws Amendment to provide for a Transition Article on Specific Reviews, in parallel to the work of the Review of Reviews Cross Community Group (RoR CCG), which we have committed to supporting. We wish to highlight our input as follows.

Proposed s.27(a) - Effective Date of the Pause Period

We note the absence of a proposed “Effective Date” and any accompanying explanation for the omission. In the absence of necessary context being made available through the [Standard Bylaws Amendment – Transition Article on Specific Reviews Public Comment Proceeding](#), we can only conclude that ICANN org also seeks input for an “Effective Date”. In this respect, we think the Effective Date should be 5 September 2025, that being the date of [ICANN Board Resolution 2025.09.05.01](#) approving the Charter for the RoR CCG.

Proposed s.27(b)(i) & (ii) - Conditions for Not Reinstating s.4.6 Specific Reviews

We do not comprehend why the conditions of s.27(b)(i) and s.27(b)(ii) are presented as separate and distinct conditions for not reinstating Section 4.6 Specific Reviews where the period for the pause proposed pursuant to s.27(a) expires. We would appreciate an explanation as to under what circumstances the s.27(b)(ii) condition would arise without s.27(b)(i) having materialized.

In other words, under what circumstances does ICANN org anticipate that a Bylaws Amendment Process under Article 25 might take place without the ICANN Board having first accepted any

community-developed recommendations on how any or all of the Specific Reviews should be modified, and then directing the implementation of such recommendations?

Proposed s.27(b)(iii) - Extension of the Pause Period by SOAC Majority

We think that a decision should be taken by consensus of the seven existing Supporting Organizations and Advisory Committees (SO/AC) as the fair mechanism to allow an extension of the 12-month pause period contemplated under s.27(a), and we agree on the cap of 24 months for the said pause period. Further, any such decision should articulate a clear rationale, and with reference to the status of the RoR CCG's work. We note that this approach differs from standard Empowered Community processes, and would benefit from additional clarity to ensure consistency with existing ICANN Bylaw provisions.

Proposed s.27(c) - Restart Schedule for Specific Reviews at Expiry of Pause Period

Firstly, from an administrative perspective, we recommend that ICANN org not seek to introduce new acronyms for any of the Specific Reviews mentioned in proposed s.27(c). Instead, the acronyms for the Specific Reviews currently indicated in parentheses should be consistent with Article 4, Section 4.6 of the Bylaws, to avoid introducing inconsistencies.

Secondly, with respect to the proposed schedule for restarting Specific Reviews as set out in s.27(c)(i) - (iv) in the event that there are no updates to the Bylaws resulting from the current RoR CCG effort and ICANN's obligations to conduct Specific Reviews are renewed, the ALAC and At-Large Community hold the positions presented in the table below. Many of these reflect the intent of the recommendations out of the [Third Accountability and Transparency Review Team \(ATRT3\) Report](#), recommendations already approved by the Board, as they pertain to Specific Reviews.

ICANN Org Proposal	Our Position
s.27(c)(i) - Accountability and Transparency Review to be initiated within 90 days of ICANN's obligations to conduct Specific Reviews resuming under s.27(b)	We agree to the proposed timeline of 90 days.
s.27(c)(ii) - Security, Stability, and Resiliency (SSR) Review shall be initiated within 18 months of initiation of the Accountability and Transparency Review	We do not agree with what has been proposed and stand by the ATRT3 recommendation that SSR Reviews be suspended until the next Accountability and Transparency Review (or any type of review that includes current ATRT duties), which shall decide if these should be terminated,

ICANN Org Proposal	Our Position
	amended, or kept as is. This review could be reactivated at any time by the ICANN Board should there be a need for this. ¹
s.27(c)(iii) - Registration Directory Service (RDS) Review shall be initiated within 18 months of the initiation of the Security, Stability, and Resiliency Review	We do not agree with what has been proposed and stand by the ATRT3 recommendation that any further RDS Reviews be suspended until the next Accountability and Transparency Review can consider the future of RDS Reviews. ²
s.27(c)(iv) - Competition, Consumer Trust and Consumer Choice (CCT) Review be initiated when 500 gTLDs applied for within the Next Round have been delegated into the root zone.	We do not agree with what has been proposed and stand by the ATRT3 recommendation that the next CCT Review be started within two years after the first introduction to the root of new gTLDs out of the Next Round.³ In any case, nothing in s.27(c)(iv) addresses the crucial need for a framework of data collection to be put in place prior to the Next Round to ensure availability of all relevant and required data sets to effectively inform the work of the next CCT Review.

In summary, the ALAC and At-Large community value the impact of Specific Reviews on Internet stability, trust, and accountability from an end-user perspective, and recommend:

- An Effective Date of the contemplated pause period be 5 September 2025, that being the date of ICANN Board Resolution 2025.09.05.01 approving the Charter for the RoR CCG;
- That the conditions for not reinstating s.4.6 Specific Reviews as set out in the proposed s.27(b)(i) & (ii) be treated as interconnected and not separated;
- That any decision to allow an extension of the 12-month pause period contemplated under s.27(a) be taken by consensus of the seven existing Supporting Organizations

¹ See: Third Accountability and Transparency Review Team (ATRT3) Report dated 29 May 2020 (<https://www.icann.org/en/system/files/files/atrt3-report-29may20-en.pdf>) s.8.4 at pages 70-71

² Ibid

³ Op. cit.

and Advisory Committees (SO/AC), instead of by simple majority, provided that this is not inconsistent with existing provisions involving the Empowered Community mechanisms. A cap of 24 months for the said pause period is also crucial.

- That the restart schedule for Specific Reviews in the event of expiry of the pause period should be:
 - The Accountability and Transparency Review to be initiated within 90 days of ICANN's obligations to conduct Specific Reviews resuming under proposed s.27(b);
 - SSR Reviews be suspended until the next Accountability and Transparency Review (or any type of review that includes current ATRT duties), which shall decide if these should be terminated, amended, or kept as is; and with the possibility of reactivation by the ICANN Board at any time;
 - Any further RDS Reviews be suspended until the next Accountability and Transparency Review can consider the future of RDS Reviews; and
 - The CCT Review be started within two years after the first introduction to the root of new gTLDs out of the Next Round, and with a framework of data collection put in place well before then.

We are agreeable for the Accountability and Transparency Review to be initiated within 90 days of ICANN's obligations to conduct Specific Reviews resuming under the proposed s.27(b).

While we recognise that the proposed Transition Article is intended as a narrowly scoped and time-bound response to current challenges, we believe this step should remain exceptional and not set a precedent for future processes.