



Comments from the Internet Infrastructure Coalition (i2Coalition)

On the May 2025 Draft ICANN Community Participant Code of Conduct Concerning Statements of Interest

The Internet Infrastructure Coalition (i2Coalition) welcomes the opportunity to provide comments on the updated draft of the ICANN Community Participant Code of Conduct Concerning Statements of Interest (“the Code”).

As a coalition representing a wide spectrum of Internet infrastructure providers—including web hosts, data centers, registries, registrars, and related service providers—we value transparency, ethical engagement, and the multistakeholder model that defines ICANN’s governance. We recognize that the legitimacy of ICANN’s processes depends on community members’ commitment to these shared values.

We commend ICANN for continuing to refine and clarify expectations related to Statements of Interest (SOIs). The current draft demonstrates meaningful progress in establishing clear, enforceable standards for ethical participation.

The updated draft offers clearer guidance than previous versions, particularly through its expanded use of practical examples that speak directly to the diversity of ICANN’s community. The distinctions made between participation and passive observation help to set a practical threshold for when a Statement of Interest is required. This is a necessary clarification and one that we support. Similarly, the thoughtful handling of confidentiality concerns—such as those related to legal obligations or proprietary business interests—shows an awareness of the complexities participants may face while maintaining ICANN’s commitment to transparency and fairness.

The inclusion of a detailed enforcement framework is a positive development. Empowering community chairs to address violations directly—while also encouraging a system of documented warnings and temporary removals—strikes an appropriate balance between accountability and flexibility. However, we encourage ICANN to supplement this empowerment with formal training and resources to ensure that enforcement is applied consistently and with due process. This will bolster confidence among participants and support the integrity of the process.

We also appreciate the Code's recognition of the role organizations play in ensuring ethical participation. It is appropriate to encourage organizations to verify that their representatives are submitting accurate and complete disclosures, especially when those representatives may be involved in multiple working groups or representing multiple interests. This shared responsibility model helps safeguard against inadvertent or intentional nondisclosure.

To support the effective implementation of the Code, we urge ICANN to invest in education and outreach. Training opportunities—whether in the form of webinars, onboarding sessions, or interactive materials—will help ensure that all community members, especially new participants, understand their disclosure responsibilities and how to meet them. We also suggest the creation of a centralized repository or tool that allows participants to maintain both general and issue-specific disclosures. This would improve transparency and accessibility across ICANN's many discussion spaces.

Finally, we encourage ICANN to consider periodic reviews of the Code as part of a broader commitment to continuous improvement. These reviews should invite community feedback and reflect changes in technology, industry practices, and ethical standards. Over time, publishing anonymized summaries of disclosure trends or enforcement actions could also support transparency and help identify areas for refinement.

The i2Coalition applauds ICANN's continued commitment to strengthening the ethical foundation of its community participation. The May 2025 draft of the Participant Code of Conduct concerning Statements of Interest reflects thoughtful community engagement and concrete progress. We believe this effort is essential to upholding the integrity of the multistakeholder model.

We appreciate the opportunity to provide feedback and look forward to ongoing collaboration to ensure ICANN remains a model of transparency, inclusivity, and accountability in global Internet governance.

All the best,
Christian Dawson
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