

RrSG Public Comment: [Updated ICANN Community Participant Code of Conduct Concerning SOIs](#)

14 July 2025

The Registrar Stakeholder Group (RrSG) welcomes the opportunity to comment on the revised draft ICANN Community Participant Code of Conduct on SOIs and General Ethics Policy.

The RrSG firmly believes that transparency of interests is crucial to fostering the atmosphere of trust which is essential to successfully conducting our work in the ICANN Community. We support the requirement that all participants in ICANN processes disclose any interests which may influence their participation.

The RrSG notes with appreciation the redline changes in the most recent revision that clarify what interests must be disclosed, provide guidance on specific as well as general statements of interest, and offer helpful examples of the types of interests and issues which should be considered in statements of interest. The clear expression within the “Discussion and Examples” section of when a person moves from attendance to participation is a useful delineation of the applicability of this Code. Further, we appreciate the confirmation that when research is supported by ICANN processes, the source of funding **must** be disclosed; we note that research is a fairly broad term which encompasses any research supported by ICANN processes or presented in ICANN contexts even when conducted outside the academic world by paid organizations. Finally, the explanation of the impact of an attorney not disclosing on whose behalf they are participating is similarly quite welcome.

The new section “Leadership Empowerment to Enforce” appropriately addresses the concerns raised by the RrSG, among others, during the previous Public Comment period with regard to enforcement. Confirmation that the Chair can remove a person from a group on a temporary basis, along with what that removal entails, will support leaders in offering welcoming and professional environments for the Community. We note that in specific cases where warranted the group Chair can escalate the situation for further action such as permanent removal of the violator from the group.

Regarding ICANN’s specific questions:

- **Are there further areas where the Code should be updated prior to adoption in order to set clear expectations for community disclosure of interests?**

The RrSG believes that the Code as currently drafted is appropriate for purposes of adoption and setting expectations for community disclosure of interests. That said, the RrSG suggests that this Code should be reviewed in two years to ensure that it meets the intended goals and intent. In its first review, the RrSG would like specific attention to be given to compliance and enforcement to make sure that the proposed process is working effectively.

- **Are there different or additional examples that should be offered in the section on “DISCUSSION AND EXAMPLES TO SUPPORT TRAINING, COMPLIANCE, AND ENFORCEMENT”?**]

The RrSG looks forward to seeing how the Code is implemented so that we can ascertain whether the examples are appropriate and the enforcement approach is fit for purpose. Depending on the level of the Code’s success in practice, the RrSG will work to address any concerns through the review recommended above.

Enforcement is critical to any code of conduct as is reviewing the code within two years of adoption to ensure effectiveness.

These updates will overall serve to help the Community understand how to apply the Code of Conduct concerning SOIs with integrity and clarity. We appreciate the time and attention dedicated to updating the draft ICANN Community Participant Code of Conduct Concerning SOIs and look forward to its prompt implementation, ideally complete by the ICANN84 meeting.

Thank you

Owen Smigelski
Chair, Registrar Stakeholder Group