

# Registries Stakeholder Group

## Overview of Public Comments 2025

*Update December 2025*



### **PUBLIC COMMENTS**

#### **1st quarter 2025**

Continuous Improvement Program Framework  
IANA 2023 Strategy: Draft PTI Strategic Plan covering 2025 to 2030  
Phase 2 Final Report on the EPDP-IDNs for ICANN Board Consideration  
Third Proceeding for Proposed Language for Draft Sections of Next Round AGB  
Draft PTI FY26 Operating Plan and Budget  
ICANN FY26-30 Operating & Financial Plan, ICANN/IANA FY26 Op Plans & Budgets  
Proposed Updates to the Operating Standards for Specific Reviews

#### **2nd quarter 2025**

Fourth Proceeding for Proposed Language for Draft Sections of Next Round AGB  
Second IANA Naming Function Review Team (IFR2) Initial Report  
Proposal for Thaana script Root Zone Label Generation Rules  
How We Meet: Reviewing the Implementation of the ICANN Public Meetings Strategy  
Governance Document for the Recognition, Maintenance, and Derecognition of RIRs  
Customer Standing Committee (CSC) changes Process for Amending the IANA SLAs  
Transfer Policy Review Working Group Final Report for ICANN Board Consideration  
PSR on Expired Domain Deletion and Expired Registration Recovery Policies

#### **3rd quarter 2025**

Updated ICANN Community Participant Code of Conduct Concerning SOIs  
Proposed Next Round Base gTLD Registry Agreement - Public Comment 1 of 2  
Final Proceeding for Proposed Language for the Draft next Round Applicant Guidebook (AGB)  
Functional Model for Root Server System Governance  
Registration Data Request Service Standing Cmte. Report for GNSO Council Review

#### **4th quarter 2025**

Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation  
Updated GNSO Stakeholder Group and Constituency Charter Amendment Process  
Second Draft of the RIR Governance Document  
Proposed Next Round Base gTLD Registry Agreement - Public Comment 2 of 2  
String Similarity Evaluation Data for New gTLD Program: Next Round  
ICANN Public Meeting Proposed Dates for 2029-2033  
Timeline for Urgent Requests for Lawful Disclosure of Nonpublic Registration Data  
Registration Data Request Service (RDRS) Policy Alignment Analysis  
Name Collision IPv6 Research Study

### **OTHER COMMENT OPPORTUNITIES**

How We Meet  
GNSO Accuracy Assignment

## PUBLIC COMMENTS

### 1ST QUARTER 2025

#### CONTINUOUS IMPROVEMENT PROGRAM FRAMEWORK

The Registries Stakeholder Group (RySG) supports the proposed Continuous Improvement Program Framework as drafted and believes its Principles, Criteria and Indicators approach provides the necessary flexibility. While supportive of the five principles, the RySG questions whether evaluating the structures on their external accountability to ICANN community is appropriate. The RySG also supports the proposed two 3-year assessment periods.

Links: [RySG Comment \(17 Jan\)](#) – [ICANN org Report of Comments \(13 Feb\)](#)

#### IANA 2023 STRATEGY: DRAFT PTI STRATEGIC PLAN COVERING 2025 TO 2030

The Registries Stakeholder Group (RySG) is broadly supportive of the Draft Strategic Plan and the different goals as organized into three focus areas of innovation, operational excellence, and community engagement and reminded that, along with the members of ccNSO and other members of the community, the RySG depends on an effective, efficient, reliable, and secure IANA function as operated by PTI.

Links: [RySG Comment \(29 Jan\)](#) - [ICANN org Report of Comments \(3 March\)](#)

#### PHASE 2 FINAL REPORT ON THE EPDP-IDNS FOR ICANN BOARD CONSIDERATION

The Registries Stakeholder Group (RySG) fully supports the Final Report as drafted and recommends the ICANN Board adopt all recommendations.

Links: [RySG Comment \(31 Jan\)](#) – [ICANN Staff Report on Comments \(18 Feb\)](#)

#### THIRD PROCEEDING FOR PROPOSED LANGUAGE FOR DRAFT SECTIONS OF NEXT ROUND AGB

The Registries Stakeholder Group (RySG) provided feedback on the proposed language for various sections of the AGB, emphasizing that transparency of the rules and predictability throughout the application, evaluation, and subsequent processes are essential. The RySG also urged ICANN to allow for a longer-than-usual public comment period for the final draft of the AGB.

Links: [RySG Comment \(7 Feb\)](#) – [ICANN org Report of Comments \(24 Feb\)](#)

#### DRAFT PTI FY26 OPERATING PLAN AND BUDGET

The Registries Stakeholder Group (RySG) is generally supportive of the PTI FY26 Operating Plan and Budget but would appreciate greater specificity on how preparations for the next round of gTLDs are accounted for during FY26, as well as more clarity regarding the duration and impact of multi-year projects.

Links: [RySG Comment \(14 Feb\)](#) – [ICANN org Report of Comments \(2 April\)](#)

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## ICANN FY26-30 OPERATING & FINANCIAL PLAN, ICANN/IANA FY26 OP PLANS & BUDGETS

The Registries Stakeholder Group (RySG) notes that more detailed accounting would support better analysis of ICANN's service prioritization, expresses concern over the impact of eliminating the Additional Budget Request (ABR) process, and highlights that the current presentation of budget documents does not provide a clear overview of where ICANN is focusing—or not focusing—its resources. The RySG requested clarification on the intended use of SFICR resources, provided comments on the Reserve Fund, registry fee increase, and ICANN meetings, and also offered feedback on several of ICANN's strategic initiatives.

Links: [RySG Comment \(14 Feb\)](#) – [ICANN org Report of Comments \(2 April\)](#)

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## PROPOSED UPDATES TO THE OPERATING STANDARDS FOR SPECIFIC REVIEWS

The Registries Stakeholder Group (RySG) provides comments on proposed updates to different sections of the Operating Standards for Specific Reviews and does not support the new section on Initialization and Planning.

Links: [RySG Comment \(27 March\)](#) – [ICANN org Report of Comments \(11 April\)](#)

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## 2ND QUARTER 2025

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### FOURTH PROCEEDING FOR PROPOSED LANGUAGE FOR DRAFT SECTIONS OF NEXT ROUND AGB

The Registries Stakeholder Group (RySG) submitted comments on proposed next round AGB language and noted inconsistencies with SupPro Final Report recommendations for the following topics: Registry Voluntary Commitments / Public Interest Commitments (RVCs/PICs), Application Questions, Application Fees, Terms and Conditions, Financial & Operational Evaluation, Registry Service Provider Selection, Name Collision, Community Priority Evaluation (CPE), and Contention Set Resolution.

Links: [RySG Comment \(1 April\)](#) – [ICANN org Report of Comments \(16 April\)](#)

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### SECOND IANA NAMING FUNCTION REVIEW TEAM (IFR2) INITIAL REPORT

The Registries Stakeholder Group (RySG) supports each of the recommendations contained in the IFR and believes they will promote transparency and improve efficiencies going forward. The RySG also supports the IFR's Incidental Findings.

Links: [RySG Comment \(25 April\)](#) – [ICANN org Report of Comments \(2 April\)](#)

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### PROPOSAL FOR THAANA SCRIPT ROOT ZONE LABEL GENERATION RULES

Members of the RySG have reviewed the proposed RZ-LGR and have no concerns with the proposal.

Links: [RySG Comment \(7 May\)](#) – [ICANN org Report of Comments \(21 May\)](#)

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## HOW WE MEET: REVIEWING THE IMPLEMENTATION OF THE ICANN PUBLIC MEETINGS STRATEGY

The RySG provided feedback on the proposed options for updates to the implementation of ICANN's 2014 Public Meetings Strategy, suggested a community discussion on how to better utilize ICANN's resources in light of rising costs, and expressed support for ICANN Org to reevaluate its meeting sponsorship strategy.

Links: [RySG Comment \(19 May\)](#) – [ICANN org Report of Comments \(2 June\)](#)

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## GOVERNANCE DOCUMENT FOR THE RECOGNITION, MAINTENANCE, AND DERECOGNITION OF RIRS

The Registries Stakeholder Group (RySG) expressed support for the proposed Governance Document for the Recognition, Maintenance, and Derecognition of RIRs and appreciates that improvements made are consistent with RySG earlier comments on the Internet Coordination Policy 2 (ICP-2) Principles Consultation Document. The RySG offered additional comments with the intention of helping the ASO AC to improve the Governance Document.

Links: [RySG Comment \(27 May\)](#) – [ICANN org Report of Comments \(6 June\)](#)

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## CUSTOMER STANDING COMMITTEE (CSC) CHANGES PROCESS FOR AMENDING THE IANA SLAS

The RySG generally supports the proposed Process for Amending the IANA Naming Service Level Agreements and suggests several substantive improvements and editorial clarifications to the current version.

Links: [RySG Comment \(30 May\)](#) – [ICANN org Report of Comments \(1 July\)](#)

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## TRANSFER POLICY REVIEW WORKING GROUP FINAL REPORT FOR ICANN BOARD CONSIDERATION

The RySG supports the Final Report as drafted and recommends the ICANN Board adopt all recommendations.

Links: [RySG Comment \(16 June\)](#) – [ICANN org Report of Comments \(2 July\)](#)

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## PSR ON EXPIRED DOMAIN DELETION AND EXPIRED REGISTRATION RECOVERY POLICIES

The RySG appreciates the work done to develop this PSR, but does not believe there is a need at this time to modify the EDDP or ERRP. The PSR notes a very low level of complaints to ICANN Contractual Compliance related to these policies, indicating they are functioning as they should. The RySG further believes there are more urgent work items for the ICANN Community, such as DNS Abuse.

Links: [RySG Comment \(30 June\)](#) – [ICANN org Report of Comments \(14 July\)](#)

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## UPDATED ICANN COMMUNITY PARTICIPANT CODE OF CONDUCT CONCERNING SOIS

The Registries Stakeholder Group (RySG) supports the updated Code of Conduct as drafted and strongly encourages ICANN to expedite the finalization and implementation of the Code of Conduct prior to ICANN 84.

Links: [RySG Comment \(14 July\)](#) – [ICANN org Report of Comments \(12 August\)](#)

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## PROPOSED NEXT ROUND BASE GTLD REGISTRY AGREEMENT - PUBLIC COMMENT 1 OF 2

The Registries Stakeholder Group (RySG) provided comments on two proposed changes to Specification 13 (.Brand TLD Provisions). The RySG limited its comments to the proposed changes related to SubPro and other consensus policies, as a team of RySG members was participating in discussions on operational changes with ICANN Org directly.

Links: [RySG Comment \(21 July\)](#) – [ICANN org Report of Comments \(28 August\)](#)

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## FINAL PROCEEDING FOR PROPOSED LANGUAGE FOR THE DRAFT NEXT ROUND APPLICANT GUIDEBOOK (AGB)

The public comment proceeding invited feedback on whether the proposed AGB language reflects the wording and intent of the Board-approved SubPro recommendations. The Registries Stakeholder Group (RySG) disagreed and provided comments on the language regarding Geographic Names (module 2), DNS Stability (module 2), Conditional Evaluation Fees (module 2), Refunds (module 2), the prohibition of communication between applicants in a contention set (module 4), Community Priority Evaluation providers (module 4), Name Collision (module 6), Applicant Questions (appendix 1), and Terms and Conditions (appendix 10).

Links: [RySG Comment \(23 July\)](#) – [ICANN org Report of Comments \(27 August\)](#)

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## FUNCTIONAL MODEL FOR ROOT SERVER SYSTEM GOVERNANCE

The Registries Stakeholder Group (RySG) is generally supportive of the proposed Root Server Governance Structure, recommended to introduce limits on the number of representatives to the Council, proactively identify sustainable sources of funding, and suggested moving Milestone 11 on the relationship with ICANN and the community to Initial Phase.

Links: [RySG Comment \(21 Sept\)](#) – [ICANN org Report of Comments \(6 October\)](#)

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## REGISTRATION DATA REQUEST SERVICE STANDING CMTE. REPORT FOR GNSO COUNCIL REVIEW

The Registries Stakeholder Group (RySG) notes that the RDRS pilot represents an innovative approach to gathering data to help inform policy and is generally supportive of the report and the recommendations contained within. The RySG provided additional comment on recommendation #3, #4, and #5.

Links: [RySG Comment \(29 Sept\)](#) – [ICANN org Report of Comments \(20 October\)](#)

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## PRELIMINARY ISSUE REPORT ON A POLICY DEVELOPMENT PROCESS ON DNS ABUSE MITIGATION

The The Registries Stakeholder Group (RySG) agrees with the three topics identified for additional community work. The RySG supports the Issue Report's suggestion of launching PDPs on both Unrestricted API Access as well as Associated Domain Checks and the objectives of such PDPs. However, the RySG does not believe they should be combined into one PDP or as "phases" of one PDP. The RySG further advocates for multi-stakeholder community work on the topic of better coordination in addressing DGA attacks.

Links: [RySG Comment \(17 Oct\)](#) – [ICANN org Report of Comments \(17 Nov\)](#)

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## UPDATED GNSO STAKEHOLDER GROUP AND CONSTITUENCY CHARTER AMENDMENT PROCESS

The Registries Stakeholder Group (RySG) has no concerns with the proposed changes to the process.

Links: [RySG Comment \(5 Nov\)](#) – [ICANN org Report of Comments \(19 Dec\)](#)

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## SECOND DRAFT OF THE RIR GOVERNANCE DOCUMENT

The Registries Stakeholder Group (RySG) endorses the second revised draft of the Governance Document for the Recognition, Operation, and Derecognition of Regional Internet Registries and RySG recognizes that stable and predictable Regional Internet Registry (RIR) operations are crucial for our members and all gTLD registries. The RySG made suggestions for refinement of Article 5 for the RIRs to consider during implementation.

Links: [RySG Comment \(7 Nov\)](#) – [ICANN org Report of Comments \(12 Dec\)](#)

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## PROPOSED NEXT ROUND BASE GTLD REGISTRY AGREEMENT - PUBLIC COMMENT 2 OF 2

The The Registries Stakeholder Group (RySG) agrees that the proposed changes in Section 4.3(f) of the Next Round RA and Section 3(e) of Specification 11, and the changes in Section 1 of Specification 7 meet the intent of corresponding recommendations of the new gTLD Subsequent procedures PDP and Review of All Rights Protection Mechanisms in All gTLDs PDP. The RySG raised concerns that newly added language in Specification 6, Section 1.2 could create avoidable operational and compliance challenges for Registry Operators. The RySG invites ICANN to share its rationale for the proposed change so that the RySG and ICANN can further discuss its implications for Registry Operators.

Links: [RySG Comment \(17 Nov\)](#) – [ICANN org Report of Comments \(22 December\)](#)

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## STRING SIMILARITY EVALUATION DATA FOR NEW GTLD PROGRAM: NEXT ROUND

The Registries Stakeholder Group (RySG) suggests an alternative solution for the ASCII i and I (U+0069 LATIN SMALL LETTER I and U+006C LATIN SMALL LETTER L) case. The RySG urges ICANN to make the SSE tool available for applicants ahead of the application period opening, and suggest ICANN to add more examples showing how the mapping category would determine the preliminary contention sets.

Links: [RySG Comment \(4 Dec\)](#) – [ICANN org Report of Comments \(18 Dec\)](#)

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## ICANN PUBLIC MEETING PROPOSED DATES FOR 2029-2033

The Registries Stakeholder Group (RySG) The RySG does not have concerns with the proposed dates, but encourages ICANN to avoid scheduling public meetings during the transitions between daylight savings time and standard time.

Links: [RySG Comment \(6 Dec\)](#) – [ICANN org Report of Comments \(22 Dec\)](#)

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## TIMELINE FOR URGENT REQUESTS FOR LAWFUL DISCLOSURE OF NONPUBLIC REGISTRATION DATA

The Registries Stakeholder Group (RySG) supports the language in the new proposed section 10.7. This language faithfully describes the compromise timeline to respond to urgent requests established by the IRT. The RySG supports the proposed definition of “Urgent Requests for lawful disclosure” as described in the new section 3.8. It matches our understanding of what has been agreed by the IRT. The RySG also supports the language of the proposed implementation note K. It the RySG's understanding that it represents the language agreed to by the IRT. In addition, the RySG highlights four items that require clarification.

Links: [RySG Comment \(15 Dec\)](#) – ICANN org Report of Comments (not yet published)

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## REGISTRATION DATA REQUEST SERVICE (RDRS) POLICY ALIGNMENT ANALYSIS

The Registries Stakeholder Group (RySG) appreciates the Board’s initiative in requesting this comprehensive policy alignment analysis and we look forward to receiving further details on what the Board considers the next steps. The RySG provided further comments on the items of direct relevance to registry operators. .

Links: [RySG Comment \(15 Dec\)](#) – ICANN org Report of Comments (not yet published)

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## NAME COLLISION IPV6 RESEARCH STUDY

The Registries Stakeholder Group (RySG) agrees that the need for an IPv6 Controlled Interruption methodology has increased substantially since the 2012 Round of New gTLDs. The RySG requests that ICANN investigate the impact on the NCAP Report and propose an implementation plan to be reviewed by the community. Pending the review of the implementation plan, the RySG agrees that, based on the results of the research studies, the use of Candidate 1 (ffff::127.0.53.53) (also represented as (::ffff:7f00:3535)) as the AAAA record in the next round of Controlled Interruption activities is a good choice.

Links: [RySG Comment \(22 Dec\)](#) – ICANN org Report of Comments (not yet published)

## OTHER COMMENT OPPORTUNITIES

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### HOW WE MEET

The Registries Stakeholder Group (RySG) provided feedback to the GNSO Council on ICANN's proposals for "How We Meet" (a.k.a. how to make ICANN's meetings more cost effective) and the potential recommendations that are intended to go out for public comment.

Links: RySG input (7 Feb)

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### GNSO ACCURACY ASSIGNMENT

The Registries Stakeholder Group (RySG) provided feedback to the GNSO Council on a set of threshold framing questions.

Links: RySG input (14 Feb)