

Registries Stakeholder Group Statement



Review of Reviews Draft Report

Date statement submitted: 4 August 2026

Reference url:

<https://www.icann.org/en/public-comment/proceeding/review-of-reviews-draft-report-25-06-2026>

Background¹

Review of Reviews Cross Community Group (Reviews CCG) is tasked to perform “a fundamental evaluation” of reviews set out in the ICANN Bylaws, “as a whole system, including their implementation, and propose a refreshed system of reviews”. Areas of focus include:

- Periodic review of ICANN structure and operations (section 4.4);
- Annual Review (section 4.5);
- Specific Reviews (section 4.6);
- Previously conducted Reviews; and
- Reviews that have previously been formally recommended.

The Reviews CCG seeks input on the approach and proposed refreshed reviews system, as a whole (Scheduled and On-Demand Reviews), as well as on the individual elements of the reviews system and its operational aspects.

Documents

- [Review of Reviews Draft Report \(PDF, 728.88 KB\)](#)

Related RySG comments & input

- [RySG Feedback to the Reviews CCG on the Review of Reviews Refined Outline](#) (12 May 2026)
- [RySG comment on the Standard Bylaws Amendment - Transition Article on Specific Reviews](#) (13 April 2026)
- [RySG Input to the Reviews CCW on Buckets A&B](#) (18 February 2028)
- The RySG commented on the Funding of ICANN’s Review process in the [RySG comment on the ICANN Plans and Budgets](#) (12 February 2026), see p. 5.

Registries Stakeholder Group (RySG) comment

Introduction and overarching comments

The gTLD Registries Stakeholder Group (RySG) thanks the Review of Reviews Community Coordination Group (Reviews CCG) for their important work on ICANN Reviews, and for the opportunity to provide input on the Draft Report.

¹ Background: intended to give a brief context for the comment and to highlight what is most relevant for RO’s in the subject document – it is not a summary of the subject document.

Overall, the RySG supports the proposed structure as a comprehensive approach that will allow the community to review whether ICANN fulfills its mission in line with its Articles of Incorporation and the Commitments, Core Values, and Article 3 Transparency Obligations set forth in the Bylaws.

We are taking this opportunity for Public Comment to highlight elements of key importance for this new review structure to be effective, to reiterate prior RySG input to the CCG, and provide additional feedback in light of the Draft Report and its supporting information².

Definition of Purpose of Reviews

The RySG agrees that the overall purpose of reviews is to examine two questions: first, is ICANN delivering against the Mission set out in the ICANN Bylaws; and second, is it doing so in keeping with its Articles of Incorporation, the Commitments and Core Values set forth in Article 1.2 of the Bylaws, and the Transparency Obligations set forth in Article 3 of the Bylaws. The RySG also agrees that the purpose of reviews is to recommend improvements as necessary and appropriate. The RySG also supports use of ICANN's Strategic, Operating, and Financial Plan documents to measure delivery against agreed upon Mission priorities.

The RySG supports the exclusion of "policy" (i.e., issues with respect to which the Bylaws assign responsibility for development and recommendation to a Supporting Organization) from the scope of reviews. While a review might incidentally identify possible policy development as a way to address issues identified in the course of a review, this should not be the focus of reviews.

Reviews Scoping Committee

The work of the Reviews Scoping Committee (RSC) is of fundamental importance to the success of the proposed reviews system. It is a fundamental matter of maturity for the ICANN Community that the RSC represents leadership, experience, and natural accountability. The responsibilities and workload placed upon those appointed will be demanding, challenging, and of extraordinary importance.

The RSC is intended to leverage and formalize the existing but currently informal SO/AC leadership group, which meets with ICANN executives and members of the Board on a regular basis. We note that this group includes the voice of elected community leaders at the SO/AC level and the constituent parts of those groups.

The SO/AC leadership group should stand up the RSC from its membership, which has been appointed through a formal internal senior selection process. The RySG supports this as a critical feature of the RSC because of the natural accountability of that group. In addition, using this group to manage the review topic selection and scoping process enables each SO and AC to rely on their own internal decision-making processes.

Because the GNSO is uniquely composed of distinct constituent parts, it will be important for the GNSO appointee to the RSC to coordinate with the full range of GNSO participants in

² Supporting information included in the [Public Comment](#), as well as related webinars, flowcharts, and community comments.

the SO/AC leadership group, including the elected leadership of constituencies and stakeholder groups.

Further, we want to highlight the importance of clear definitions and fully developed procedures for the RSC. We understand that work and discussions in this regard are still ongoing within the CCG, including on definitions and scenario-testing, and that other things will have to be addressed as part of the implementation phase of the new system.

In particular, we want to point to the following:

- The RSC decision-making process needs to be based on clearly defined concepts, including for what constitutes a “threshold”, “vote”, “consensus”, etc..
- The role and responsibilities of the ICANN Org and ICANN Board representatives, with regard to contributing to a consensus or a vote, should be clarified.
- It should be defined how many SOs/ACs need to be represented for the RSC to be able to function, and how thresholds and consensus are impacted should an RSC seat remain vacant.

The Proposed Refreshed Reviews System

Avoiding colliding review cycles

The RySG notes that the so-called “Accountability and Transparency Review” bucket is intentionally broad and gives the opportunity to ask questions across the full range of topics specified for review in the current Bylaws, i.e., accountability & transparency; security, stability, & resiliency; competition & consumer trust, and registration data services. The careful community-wide topic selection and rigorous scoping process managed by the elected leadership of the SOs and ACs will help ensure that review topics are timely and important, that the review team includes appropriate expertise, and that the reviews are efficient and produce actionable recommendations.

Given the intentional breadth of the potential review topics, the RySG does not support out of cycle call outs for specific subsets of ATR reviews, e.g., stability, security, and resiliency. SSR, for example, is clearly well within the scope of an ATR, as it is fundamental to ICANN’s Mission. The RySG is concerned that periodic community call outs beyond the normal 5-year cadence will discourage inclusion of important topics such as stability and security in the primary review cycle. The community was clear about the need to avoid colliding review cycles, and in the RySG’s view, the call outs are both unnecessary and increase the likelihood of colliding reviews. The RySG supports deletion of Section 3.2.2 in its entirety. To the extent the community needs to be prompted to identify specific issues such as SSR, the RySG would support specific solicitation of such issues as part of the standard RSC scoping process. We are aware that the CCG is discussing a [“Proposal: Consolidated ATR Scoping Process with Thematic Topic Slates,”](#) which appears to address these concerns, and we look forward to providing input on the final proposal.

Avoiding timeline complications

The RySG considers a clearly defined timeframe to be an essential feature of the proposed reviews system. Delays, backlogs, overlapping reviews, and unpredictable community

workloads are among the key community concerns that the Refreshed Reviews System is expected to address. To support these objectives, the RySG encourages the CCG to introduce guidance and timeframes for the SO/AC endorsement or approval process for RSC recommendations.

Specifically, consideration should be given to: (1) establishing a defined period (e.g. 30 days) within which SOs/ACs are expected to take action, and after which, in the absence of any conclusion, the recommendation would be presumed approved or endorsed; and (2) limiting SO/AC action to an up-or-down decision, avoiding reopening the recommendation for lengthy negotiations and discussions.

A clearly defined timeframe would help provide greater predictability, avoid delays, and support a more efficient and manageable reviews system.

Implementation of review outcomes

The RySG supports the CCG's recommendation that "the relevant Review Team would remain active until Board action on their Final Report, to help preserve context, and support accountability". To further enhance the transparency and momentum of this stage of the review process, the RySG encourages the CCG to recommend that, within six months of the publication of the Final Report, and at regular intervals hereafter, there is a communication from the Board that provides an update on the status of the Board's consideration of the recommendations.

The ICANN Public Comment opportunity on review outcomes and recommendations is an essential stage, providing an opportunity for community-wide input before conclusions are finalised and recommendations considered by the Board. It is our understanding that the CCG does not intend to change current practice or diminish the role of Public Comment on review outcomes. To avoid ambiguity, the RySG recommends that this is explicitly reflected throughout the Draft Report and associated Flow Charts. While, in the current Draft Report, Section 3.2.4.5 (Consequential Effects Review) states that review outcomes will be subject to comment, by contrast, Sections 3.1.1.6 (ATR) and 3.1.2.5 (Structural Review) state only that the final reports "will be provided to the SOs/ACs for formal sign-off before submission to the ICANN Board for consideration", which may give the impression that review outcomes will not be shared for Public Comment.

Structural Review Cadence

The RySG recommends the 15-year cadence for Structural Reviews. Given the time required to establish a review, conduct a review, develop recommendations, consider the final recommendations, and implement the resulting changes, a shorter review cycle would risk assessing the effectiveness of reforms before they had sufficient time to get traction and mature. A 15-year cadence provides an appropriate balance between ensuring periodic review and allowing implemented changes to become established and demonstrate their impact.

The RySG further recommends that the first Structural Review be initiated only after the Continuous Improvement Process (CIP) has gone through its first Reporting Phase. While the RySG acknowledges that the CIP relates only to a small part of the scope of the Structural Review, its findings are likely to provide valuable input to the Phase 2 of the Structural Review, the Internal Landscape Assessment.

On-Demand Review Framework

We understand that the purpose of the On-Demand Review Framework is to allow the community to address urgent issues on a timely basis. As suggested above, the RySG believes that Section 3.2.2. calling for consideration of out-of-cycle reviews on SSR, CCT, RDS, or Review of Reviews should be deleted.

The RySG also believes that the description of the On-Demand Framework in Section 3.2.3 should specifically address the reasons why the issue should not wait until the next relevant regularly scheduled review.

One-time Review

The One-time Review described in the Draft Report is intended to review the Continuous Improvement Program (CIP) pilot. ICANN Board Resolution [2025.05.19.02](#) stated, “The CIP pilot work is proceeding” and “the CIP should progress as planned.” The RySG observes that in accordance with the [published CIP Framework \(2025\)](#), “The CIP-CCG intends a CIP assessment cycle to take no longer than three years, with flexibility for each group to progress through the three phases of the CIP on a timeline that meets their needs within that period. The first CIP assessment cycle is estimated to begin in 2025 and is expected to conclude by the end of a three-year period.” The CIP Implementation Status Dashboard [as of July 2026](#) shows 78% of the community groups are in Assessment Phase 1, with one community group in Assessment Phase 2, and one group with a deferred start (not yet begun).

The [CIP wiki workspace](#) states that “The ICANN Board will assess the CIP pilot following the conclusion of one CIP cycle (estimated for Q3 2028).”

To avoid duplication and maintain community resources, the RySG recommends that clarification be provided on the One-time Review and assessment of the CIP pilot by the ICANN Board as described. As noted above in “Structural Review Cadence”, CIP findings are likely to provide valuable input to the Phase 2 of the Structural Review, the Internal Landscape Assessment.

Consequential effects Review

The RySG recommends that the Consequential Effects Review be removed as a standalone review and that its underlying rationale instead be incorporated into Phase 3 of the Structural Review. The RySG considers the purpose of the Consequential Effects Review to be duplicative of the Structural Review: “The Consequential Effects Review is a safeguard to ensure that changes to interdependent relationships are not made single-handedly and are not made without broader community agreement.”

Implementation of the Refreshed Review System

With regard to the implementation of the Refreshed Review System, the RySG would like to reiterate the [input it previously provided to the CCG](#). The RySG considers these points to be relevant to the successful implementation of the proposed framework:

“ICANN Reviews are cross-functional, and ICANN does not have a single, consolidated cost figure nor function for reviews. These Reviews are inherently cross-functional and have significant operational and financial impacts across the organization. Despite this, ICANN currently lacks both a centralized cost-tracking mechanism and a dedicated operational function responsible for assessing and managing the cumulative impact of Reviews. The RySG previously observed that ICANN org’s Executive function included staff focused on operational oversight. ICANN should be able to consolidate Review-related costs, evaluate operational impacts, identify duplication, and develop measurable KPIs to assess Review effectiveness. Without this capability, ICANN lacks the transparency and operational accountability necessary to properly manage the Review process.”
