

26 May 2025

The NRO NC

Subject: Comments on the Governance Document for the Recognition, Maintenance, and De-recognition of Regional Internet Registries (“**RIR Governance Document**”) dated April 14, 2025.

Hi

CCAOI thanks the NRO NC for providing us the opportunity to submit our comments on the Governance Document for the Recognition, Maintenance, and De-recognition of Regional Internet Registries (“**RIR Governance Document**”) dated April 14, 2025.

CCAOI is a trust engaged in capacity building, research and advocacy mostly in India especially related to Internet and digital policies, representing the interest of different stakeholders of the Internet ecosystem in India, including connected and unconnected users.

Please find enclosed our submission on the RIR Governance Document.

Thanking you and looking forward to favourable consideration of our suggestions.

With Regards,

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CCAOI's Comments on the Governance Document for the Recognition, Maintenance, and De-recognition of Regional Internet Registries ("RIR Governance Document")

Please find our comments are as below:

1. Expanded Scope and Lifecycle Governance

The draft RIR Governance Document marks a significant evolution from the ICP-2 framework by shifting its focus from merely outlining the establishment criteria for new RIRs to covering the entire lifecycle of an RIR. This includes not only the initial recognition of a new RIR but also the ongoing maintenance of standards and the eventual possibility of de-recognition if an RIR is unable to fulfil its responsibilities. Such a comprehensive approach reflects the growing complexity of Internet governance and aligns with best practices in institutional accountability. By embedding lifecycle governance, the document creates a stronger foundation for operational continuity, and community trust in the global number resource ecosystem.

However, despite these commendable additions, the document would benefit from **further elaboration on the procedures and safeguards associated with de-recognition**. While it states that de-recognition should be a last resort, the **absence of a clearly defined minimum period for remediation may result in uncertainty or disproportionate action**. It is important that the governance framework sets out a **baseline timeline or grace period that a non-compliant RIR must be given to rectify the issues, unless there is an urgent risk to the stability or security of the Internet Number Registry System**.

In addition, the draft document notes that ICANN and the other RIRs are expected to **provide "reasonable support" to help a non-compliant RIR address its failures**. While the intent is appreciated, the **scope and nature of such support are not clearly defined**. For instance, will this support include technical assistance, governance advisory services, or financial help? Will a formal remediation plan be developed and agreed upon between the parties? Clarifying these expectations would enhance transparency, reduce ambiguity, and foster collaboration between RIRs during crises.

Finally, there should be a well-documented, stepwise remediation and transition process that outlines how the transfer of services, data, and responsibilities will occur if de-recognition becomes unavoidable. This transition framework should prioritize continuity for end users and resource holders, establish clear roles for interim service provision, and specify how decisions during the transition will be made and

communicated. Including these details will ensure that even in the most adverse situations, there is a structured, fair, and transparent process in place that protects the interests of the numbering community and maintains the integrity of the Internet Numbers Registry System.

2. Governance Reforms and Inclusion

The introduction of member-controlled governance, independent oversight, and anti-capture mechanisms in the draft document represents a significant improvement over previous framework. These measures are essential to safeguard the autonomy and credibility of RIRs and ensure that they remain accountable to their respective communities.

However, while these structural elements are crucial, true inclusivity in governance requires explicit and actionable commitments to diversity. **We recommend that the governance framework go further by embedding provisions that promote geographic, gender, and stakeholder diversity across all levels of RIR decision-making bodies.** This includes, but is not limited to, the governing body, policy development fora, and advisory councils.

3. Audit, Transparency, and Public Oversight

While regular external audits are a welcome addition, we propose requiring the publication of anonymized summary reports post-audit and offering public comment opportunities to strengthen accountability.

4. ICANN's Role and Appeals Mechanism

The clarification of ICANN's role in the RIR Governance Document is a positive step toward maintaining a balanced, multi-stakeholder governance structure. By explicitly stating that ICANN cannot unilaterally initiate the recognition or de-recognition of a RIR, the document respects the collaborative nature of the Internet Numbers Registry System and reinforces the primacy of community consensus. This limitation serves as a safeguard against the over-centralization of authority and preserves the autonomy of RIRs. Moreover, requiring unanimous RIR agreement before a proposal is forwarded to ICANN ensures that any change in RIR status is community-driven and well-vetted before reaching the final decision-making stage.

However, the document leaves the reconsideration mechanism, in cases where ICANN makes a decision on recognition or de-recognition, underdeveloped. The language stating that RIRs or Candidate RIRs may petition **ICANN to reconsider a decision, "in accordance with ICANN's then-existing review procedures,"** is vague and

open-ended. This could lead to inconsistencies or a lack of transparency in how such petitions are handled.

We recommend the inclusion of a clear and standardized reconsideration procedure, including timelines for filing and resolving petitions, the criteria ICANN will use in its review, opportunities for the affected parties to present their case, and whether third-party or community input will be permitted. Without such detail, stakeholders may lack confidence in the fairness and predictability of the reconsideration process.

5. Community Engagement and Capacity Building

To improve accessibility and understanding of the RIR Governance Framework, we suggest the development of plain-language community briefs, multilingual explainers, and region-specific capacity-building programs. These tools would help ensure that stakeholders, especially those from underrepresented regions, can meaningfully engage with the policy framework and related processes.