



Representing the ecosystem of Internet -Bharat Model

7 November 2025

To,
The NRO NC

Subject: CCAOI Comments on the Governance Document for the Recognition, Operations, and De-recognition of Regional Internet Registries ("**RIR Governance Document**") Version 2 dated 28 August 2025.

CCAOI thanks the NRO for providing us the opportunity to submit our comments on the Governance Document for the Recognition, Operations, and De-recognition of Regional Internet Registries ("**RIR Governance Document**") Version 2 dated 28 August 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 Version 2.

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, Operations,
and De-recognition of Regional Internet Registries ("RIR Governance Document")**
Version 2

Our comments are as below:

1. Remediation Process and Timelines

While Clause 6.2 emphasizes rehabilitation over immediate derecognition, it currently lacks **clear timelines, milestones, and procedural steps** to guide the remediation process. The reliance on "reasonable opportunity to cure" introduces subjectivity that may lead to inconsistent application across RIRs and potential uncertainty for affected communities. We recommend establishing a **defined remediation framework**, including (a) a minimum fixed remediation period such as six to twelve months unless there is a demonstrable and urgent risk to the stability or security of the Internet Numbers Registry System; (b) a formal written remediation plan jointly developed by the non-compliant RIR, the other RIRs, and ICANN, setting out specific corrective actions; and (c) periodic progress assessments with transparent communication to stakeholders. This would promote predictability, fairness, and accountability while ensuring that derecognition is genuinely reserved as a last resort.

The concept of "**reasonable support**" under Clause 6.2, which states that other RIRs and ICANN should extend to a non-compliant RIR remains undefined, and this ambiguity may result in inconsistent or insufficient assistance. To foster equitable and effective remediation, we recommend clarifying the **scope, structure, and delivery mechanisms** of such support.

2. Appeal and Reconsideration Framework

Clause 2.3(c)(ii) allows affected RIRs or Candidate RIRs to petition ICANN for reconsideration but references **ICANN's "then-existing review procedures"**, which may not be tailored to this context and may vary over time. This introduces uncertainty as to how reconsideration will be handled, who will review it, what standards of evidence apply, and how transparent the process will be. To ensure fairness, predictability, and legitimacy, we recommend the creation of a **dedicated reconsideration and appeals procedure** within this governance framework, including: defined timelines for submission and response; right to present evidence and justification; involvement of an **independent review panel or expert body**; opportunity for community input where appropriate; and publication of decisions with clear reasoning. This will strengthen procedural guarantees and avoid perceptions of unilateral or opaque decision-making.

3. Diversity and Stakeholder Inclusion

While the document ensures member-controlled governance and open policy development participation, it currently does not include explicit commitments to

stakeholder, geographic, and gender diversity in decision-making bodies. Given the varied social, economic, and network maturity conditions across service regions, incorporating diversity safeguards is essential to ensuring legitimacy, fairness, and representativeness.

We recommend including language that encourages or requires governing bodies and advisory mechanisms to reflect a balanced representation of gender identities, geographic sub-regions, and stakeholder categories. This would advance the bottom-up, community-driven ethos of the Internet Numbers Registry System and support equitable participation across constituencies.

4. Audit Transparency

The requirement for periodic and ad hoc audits is a strong accountability measure, but the current commitment to publish only a “summary report” may not sufficiently promote transparency and community trust. We recommend requiring the publication of **anonymized audit findings**, along with the audited RIR’s **formal response** detailing planned corrective measures, and follow-up reporting on implementation progress. Additionally, a structured **public comment period** would allow the broader Numbering Community to provide input, improving oversight and reinforcing shared stewardship. These enhancements would balance transparency with confidentiality while ensuring audits serve as constructive governance tools rather than purely administrative checks.

5. Emergency Continuity Threshold and Scope

The mechanism for temporarily transferring RIR service operation to an Emergency Operator (Clause 5.1) is important for stability, but the current language does not clearly define what conditions constitute an “**Emergency Continuity**” situation. To prevent unintended overreach, we recommend adding objective criteria, such as prolonged operational failure, insolvency, governance paralysis. Additionally, it should be explicit that the Emergency Operator’s authority is **strictly limited to operational continuity**, not governance or policy-making functions. Renewal beyond the initial 90-day period should require **transparent community consultation** and demonstrated necessity. This ensures continuity protection without undermining RIR autonomy.

Transitions arising from Emergency Continuity or Derecognition materially affect Resource Holders and the Numbering Community, yet the document does not include explicit communication obligations. To maintain trust and avoid service confusion, we recommend requiring the publication of **clear, plain-language, multilingual notices** explaining the transition, expected timelines, available support channels, and points of contact. Additionally, structured **briefing sessions and public Q&A opportunities** should be mandated during transition periods, along with ongoing updates via official channels. Such communication safeguards reinforce transparency and continuity while promoting community understanding and participation.

The document rightly provides for review after Emergency Continuity, but does not explicitly state that responsibility for RIR Services should be restored to the affected RIR as soon as **operational capability is satisfactorily re-established**. We recommend defining the verification criteria for restoration and requiring publication of the post-event review and restoration rationale. This ensures Emergency Operators do not retain operational control longer than necessary and upholds the principle that regional communities govern their own registries.