# ICP<sub>2</sub>

Criteria for Establishment of New Regional Internet Registries

QUESTIONNAIRE





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# Introduction

This summary aims to provide a high-level overview of the comments received on <u>the proposed ICP-2 principles</u>. The NRO NC (which acts as the ASO AC) will use the input received to produce the updated version of the ICP-2 document.

Please note that this is a summary of the feedback submitted and those interested in reading through the community input in detail should refer to <u>the complete dataset published on the NRO website</u>. We would like to emphasize that members of the NRO NC have reviewed all the comments that were submitted, even if they have not been included in this report.

This report hopes to provide a useful summary of the input received, first and foremost, to support the drafting of the updated ICP-2 document, and secondly, to report back to the RIR communities on the feedback received. Thirdly, the feedback provides important insights that might be useful for the future implementation of the updated version of ICP-2.

This report does not include the NRO NC's opinions on or responses to the comments submitted, nor does it include an evaluation of the communities' opinion on the principles. The NRO NC will continue to discuss the communities' feedback as well as the feedback received through ICANN's public comment while drafting the updated ICP-2 document.

We sincerely thank everyone who has shared their insights. It was a long questionnaire, and we appreciate the time, thought and effort put in by our respondents.

### Background

As part of the process to update ICP-2, the NRO NC published <u>a set of</u> <u>proposed principles</u> that could form the basis of the updated document. A questionnaire was shared with the Regional Internet Registry (RIR) communities to gather input on these principles. The questionnaire was open from 8 October until 6 December 2024. It asked respondents to rate each principle from 1 to 5 corresponding to Strongly Disagree (1) to Strongly Agree (5). Respondents could further share comments on each principle and then leave a general comment at the end of the questionnaire.

During the same period, ICANN also held a public comment review for the proposed principles. <u>The ICANN report is available online.</u>

## Scope of the ICP-2 Update

The task of the NRO NC is to update ICP-2, not to fundamentally redesign the existing RIR system from the ground up or to change the nature of the original ICP-2, which sets out the criteria for the establishment and operation of an RIR. Comments that address improvements to the existing system were particularly valuable. The NRO NC is also not charged with designing the process to implement the updated ICP-2, which is understandably of high interest to the RIR communities.

We thank everyone who has shared concerns, suggestions and raised valuable questions about the future implementation. Although the



implementation of the principles is outside the scope of ICP-2 and the work of the NRO NC, your detailed feedback will be shared with the RIRs. For the purposes of transparency and possible future use, the comments on implementation have also been included in this overview.

#### Methodology

Members of the NRO NC and supporting RIR staff reviewed the comments received. Upon reading through the comments, we worked to identify the main themes or concerns emerging from the comments to create a summary for each principle. Additionally, comments that provided constructive feedback or relevant insights were also included in the summary.

We further considered whether the comments pertained to the content of the principle itself, the possible implementation of that principle or the phrasing of the principle. Comments that did not relate to the principle or ICP-2 in general were marked as being off-topic and excluded from this summary.

We received 298 individual submissions from the RIR communities. Upon review, approximately half of these were found to be duplicate comments, most likely generated using artificial intelligence (AI) tools. A more detailed note on how these were considered is shared below.

Many responses provided a rating that did not match the content of the response. We evaluated the content of the response, rather than using the rating from Strongly Disagree to Strongly Agree.

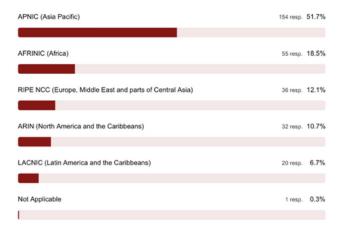
#### Data cleaning and consolidation of duplicate responses

A linguistic clustering analysis was conducted to identify repeat comments, concluding that approximately 150 of the 298 responses received belonged to clusters of highly similar responses. This analysis was carried out using the deep learning model, BERT (Bidirectional Encoder Representations from Transformers), to identify clusters of highly similar responses. Filtering out highly-similar responses allowed us to focus on the content of the unique comments received.

It is important to note that these near-identical responses have also been included in this analysis. However as these repeated the same pieces of information, each group of identical comments has been treated as a single input. The identical comments were also manually reviewed to check for false positives.

The summary includes a selection of comments related to each principle, to provide a glimpse of the comments received. <u>The full</u> <u>dataset of comments is available on the NRO website.</u>

#### Responses received by region



# Authority

Any proposal to recognize a Candidate RIR or to derecognize an RIR must originate from the NRO EC after a majority vote in favor of the proposal. ICANN shall have final authority to decide whether to adopt the proposal, subject to ICP-2, provided that ICANN has first consulted with and given substantial consideration to the input of each RIR.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - There is a need for a balance of authority between the NRO EC and ICANN
  - The input from other stakeholders needs to be included such as RIR communities or the ASO AC, the GAC and RIR communities and members
- Comments also raised concerns with the principle, namely:
  - The role of the NRO EC needs clarity, there is the possibility of becoming gatekeepers
  - The existing RIRs might have a conflict of interest with the establishment of new RIRs
  - Giving ICANN the final authority could contradict the independence of the RIRs, ICANN might gain a lot of power
- Others felt that ICANN has a global oversight role and hence its involvement is appropriate
- The role of all stakeholders and the processes behind should be transparent
- Multistakeholder involvement of the RIR community is indispensable

# Sample Comments

"This principle establishes a clear and balanced approach to RIR recognition and derecognition. It empowers the NRO EC to initiate proposals based on community consensus, while granting ICANN the final authority to ensure global consistency and adherence to ICP-2 principles. This division of authority safeguards the stability and integrity of the internet's numbering resources."

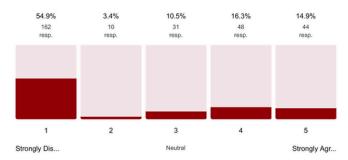
"A candidate RIR will emerge always for part(s) of any of the 5 service regions, so i see a clear conflict of interest in the ability of RIRs voting about it."

"Consensus among and within the RIR community under consideration should also be considered."

# **Numerical Rating**



295 out of 298 answered



# Amendment

ICP-2 may be amended upon the agreement of ICANN and all RIRs.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - If one RIR is unable to participate, the support of the majority of the RIRs should be sufficient to amend ICP-2
  - There is a need to include feedback from stakeholders such as the IETF or the GAC, or RIR members when amending ICP-2
  - The processes to amend ICP-2 should be clear and transparent
- Some concerns raised about this principle were:
  - There is a risk that ICANN could block changes and updates to ICP-2
  - The need for unanimity among the RIRs and ICANN could effectively create a deadlock or veto
  - The role played by ICANN could reduce the autonomy of the RIRs
- There was a suggestion to follow the Global Policy Development
  Process
- A clarification is needed do ICANN and the RIRs here refer to the legal entities, their boards, members or executives?
- Some suggested that RIRs could amend ICP-2 without the involvement of ICANN or an RIR, for example, if one RIR is not functional

# Sample Comments

"What if an existing RIR is insolvent or unable to participate in the decision for some reason? How do you still make the decision without 100% of RIRs participating?"

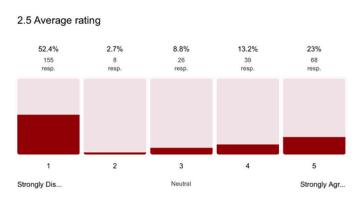
"Requiring agreement from ICANN and all RIRs promotes inclusivity but this could lead to gridlocks. It will be helpful to consider a fallback mechanism for critical amendments in case of disagreement."

"While I support this principle, I am assuming a level of process associated with it for consultation, comment and review."

# **Numerical Rating**

#### Amendment

296 out of 298 answered



# Rectification

If an amendment to ICP-2 conflicts with an RIR's existing policies, practices, or bylaws, the amendment shall prescribe a reasonable but specific grace period for the RIR to bring its conflicting policies, practices, or bylaws into conformity with ICP-2 before the RIR may be considered non-compliant.

# Summary of the comments received

- Several respondents considered this principle to be redundant as any changes to ICP-2 would necessitate the agreement of all RIRs as per the "amendment" principle.
- Some pointed out that it is unlikely that an RIR will agree to an amendment that it cannot comply with
- Concerns were raised with the potential implementation of this principle:
  - A grandfathering clause should be considered to ensure that RIR members are not unduly affected by amendments to policies
  - The definition of the grace period is important; several comments included suggestions for the duration of the "grace period"
  - There is a need to specify consequences if an RIR is unable to comply due to certain factors
- An identical comment received multiple times cautioned against defining a time period as the respondent felt that it could erode the independence of each individual RIR and their adaptability
- There were concerns about potential conflicts between the process of agreeing to the amendment and the process governing changes to a policy or bylaws within each RIR

# Sample Comments

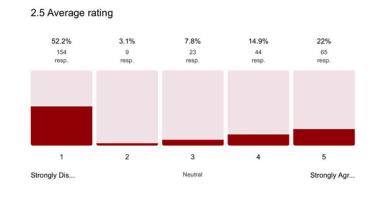
"At a high level, the principle of rectification is, conceptually, hard to argue against. The challenge resides in how it will be implemented. As above, if an amendment requires unanimity, an RIR uninterested in modifying their policies, practices, or bylaws, can simply veto the amendment, so rectification becomes moot. If non-unanimity decides on acceptance of an amendment, the question then becomes what is "reasonable" and "who decides what is reasonable and/or compliant"."

"Fundamentally, RIRs are accountable to their constituents, not ICANN or the other RIRs. However, this is a context that requires cooperation and crossoversight. The approach here seems a reasonable compromise."

# **Numerical Rating**



295 out of 298 answered



# Coverage

All RIRs shall jointly ensure that all areas on the globe continually receive RIR services.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - Ensuring global coverage is essential for global Internet stability
  - It helps ensure the integrity of the Internet, reflects the global nature of the Internet and the shared responsibilities of the RIRs to provide services to all regions
  - All areas of the world should have access to uninterrupted RIR services
- Some comments shared input on the phrasing of this principle, namely the difference between the use of the words "jointly" and "collectively"
- Some respondents pointed out the need to nuance the idea of shared responsibility in the context of the principle stating that service regions should not overlap.
  - Although responsibility is shared, the non-overlap clause could prevent other RIRs from offering support to a region if needed
  - There is a need to discuss responsibilities for sub-regions and edge cases of regions served by multiple RIRs such as the Caribbeans
  - "Jointly served" is a useful approach as one RIR could step in if another fails to serve a region

- Concerns raised regarding this principle were:
  - This principle does not address the issues of equitable distribution of resources or services for resource-constrained regions
  - There needs to be further discussion on regions where RIRs might face limitations in offering services due to external circumstances such as sanctions and conflicts
- Some questioned the efficiency and cost-effectiveness of this model
- A respondent suggested considering outer space as a region



# Coverage (continued)

All RIRs shall jointly ensure that all areas on the globe continually receive RIR services.

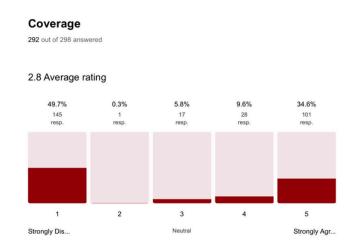
# Sample Comments

"I agree with this principle to a large extent. It reflects the global nature of the internet and the shared responsibility of RIRs to provide continuous and equitable services to all regions. By ensuring that no area is excluded from access to vital RIR services, this principle helps maintain the internet's integrity and ensures fair resource distribution. However, the practical implementation may require significant collaboration, resources, and overcoming regional challenges, which could test the capacity of RIRs. Nonetheless, striving for global service coverage is a vital goal for the sustainable development of the internet."

"I wonder whether it should be jointly and collectively, since if someone doesn't want to play nice the current language suggests that the whole assurance fails. I am not sure this nuance is important for the principles stage, except to make sure everyone agrees on what is the right outcome."

"Ensuring consistent global coverage prevents regions from lacking essential services, which is crucial for global internet stability and equity."

## **Numerical Rating**



# Service Region

The Region for which an RIR is responsible shall cover a large multinational geographic area and shall not overlap with that of another RIR.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - Maintaining the current approach avoids duplication, conflicts or confusion in resource allocation
  - Supports the stability of the global Internet number system
- Respondents who disagreed with the principle stated the following reasons:
  - Users should be able to choose the RIR they wish to obtain resources from and that competition would increase efficiency
  - The extent to which a regional approach is relevant for multinational companies was commented upon
- Some respondents raised the following concerns:
  - There is a need to define "multinational" to avoid capture by states and the "service region"
  - Overlap might be necessary to ensure continuity of services
- Other comments pointed out that RIR services are a commons for the larger good and should not compete, i.e. "RIR shopping" is to be discouraged and undermines the integrity of the RIR system
- Some stated that the service region should be clearly defined, so that uninterrupted RIR services worldwide is guaranteed and flexibility and redundancy are possible

# Sample Comments

"There is no reason to restrict overlapping. Any member should be able to choose an RIR to work with."

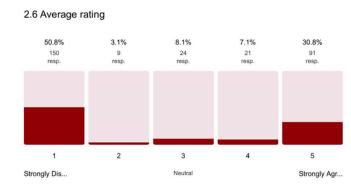
"In discussion with RIR staff it was explained to me that "and shall not overlap with that of another RIR" is intended to mean that RIRs may not refuse an otherwise legitimate request from an organisation within their service region. It does not forbid RIRs from registering resources to organisations based outside of their service region. That interpretation is reasonable as multi-national networks are a reality. But the language could be made clearer."

"The implications of this clause need to be clarified so that the nature and meaning of the RIR's responsibility (referred to here) is unambiguous and consistent across all RIRs. The current ad hoc and inconsistent approach to "RIR shopping" and to the movement of resource registrations between RIRs is unsustainable and undermines the integrity of the RIR system."

# **Numerical Rating**

#### Service Region

295 out of 298 answered



# ICP-2 Questionnaire Summary Report

# Recognition

A Candidate RIR must meet or demonstrate that it can meet all the requirements of an RIR specified in ICP-2 to be recognized as an RIR.

## Summary of the comments received

- · Comments in support of this principle stated that:
  - Demonstrable proof of compliance builds trust among stakeholders
  - This ensures that RIRs have the necessary infrastructure, governance and capacity to manage Internet number resource allocation
  - This will help uphold the integrity of the Internet number registry system
  - This principle will help ensure consistency across the RIRs
- Some comments addressed the implementation of this principle, namely:
  - There needs to be a defined time frame for the Candidate RIR to meet requirements
  - If a Candidate RIR does not meet the requirements it can be recognized provisionally, and then be given a grace period to meet the requirements
  - The requirements that a Candidate RIR needs to meet should be defined clearly
  - There should be proof of compliance with the requirements and greater clarity on how this compliance will be validated
- Some comments pointed out that a Candidate RIR that does not meet the requirements should be de-recognised
- There were comments on the phrasing, particularly the use of "can meet" vs. "meets" or "must meet"

## Sample Comments

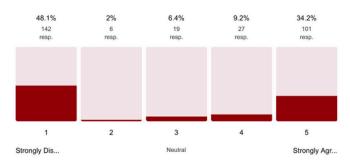
"We need to define how or what it means to be able to "demonstrate" that it can meet all requirements of an RIR..."

"A Candidate RIR must meet all the requirements specified in ICP-2 to be recognized as an RIR. Demonstrating that it "can meet" the requirements means it does not yet meet them, which means it is not yet able to function as, or be recognized as, an RIR."

# **Numerical Rating**

Recognition

295 out of 298 answered



# Operation

An RIR, once recognized, must continually meet all the requirements specified in ICP-2 in an auditable fashion.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - There is a need to maintain trust and the integrity of the RIRs
  - · Maintaining standards is essential to retain stakeholder trust
  - It fosters accountability and transparency
- · Respondents who disagreed with the principle stated that:
  - Complying with requirements could undermine RIR independence and this could lead to chaos (identical comment submitted repeatedly)
- Several comments pointed out the need for more details concerning the implementation of the audit process:
  - There were several suggestions regarding the frequency of audits, and suggestions regarding the requirements such as having service-level agreements
  - The enforcement of this principle could be difficult, particularly in cases of non-compliance
  - The consequences of non-compliance need to defined
- A comment submitted repeatedly stressed the need for IP address portability

## Sample Comments

"I strongly disagree with the requirement that an RIR must continually meet all ICP-2 standards in an auditable manner. Such a rule undermines regional independence and could lead to chaos and conflicts among RIRs." (comment submitted repeatedly)

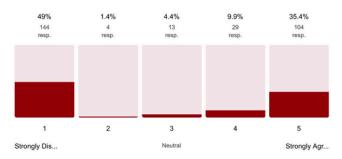
"Auditable. I understand but it's still a bit vague. There are different types of audits."

""Continually" is, pragmatically speaking, unrealistic and does not take into consideration planned outages, disruptive events outside of the RIR's control, etc. Auditable requirements, particularly those related to performance and services, should be threshold-based, like the IANA performance expectations with explicit service level commitments and mutually agreed acceptable "cure" timeframes."

# **Numerical Rating**

Operation

294 out of 298 answered



# Derecognition

An RIR that does not continue to meet all the requirements specified in ICP-2 may be derecognized as an RIR.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - The processes leading up to derecognition should be clear, transparent and well-defined
  - There should be a defined grace period to help provide guidance and corrective action, including opportunities to appeal, possibly addressed by the addition of a remedial phase in the RIR life cycle between operation and derecognition
  - Derecognition should be a last resort
- Respondents who disagreed with the principle stated that derecognition should not be immediate, automatic or due to minor or temporary lapses
- Several comments addressed the implementation of this principle:
  - Meeting ICP-2 requirements should be objectively verifiable
  - The processes leading up to derecognition should be clear, transparent and well-defined
  - There should a smooth, clear handover process in case of derecognition
  - Derecognition should be a last resort
- The phrasing of the "operation" principle indicates a de-facto presumption of derecognition in the case of continual non-compliance
- The roles of the NRO EC, the RIRs and ICANN need to be clearly defined

## Sample Comments

"As I support the idea we need to define the derecognition, I simply support this. I would argue to add the remedial phase of lifecycle between operation and derecognition."

"In principle yes, but the 'derecognition' process should not exclusively lie with the NRO which is effectively a trade association with potentially vested interests in maintaining the status quo. The derecognition conditions and process needs to be better enumerated."

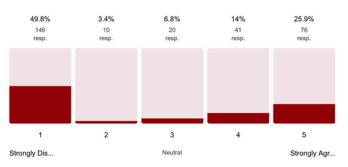
"Generally agree that derecognisation must be possible, but the devil will absolutely be in the details of what lies under the principle."

"This requirement for immediate derecognition of an RIR that does not meet all ICP-2 standards is overly harsh and risks destabilizing the regional Internet infrastructure. Given the diverse challenges faced by RIRs, temporary lapses should not automatically trigger derecognition. A supportive approach would provide the necessary resources for resolution." (Comment submitted repeatedly)

# Numerical Rating

#### Derecognition

293 out of 298 answered



# **Community Support**

Resource Holders in the Region that the Candidate RIR proposes to serve must broadly support recognizing the Candidate RIR as the RIR responsible for serving that Region.

## Summary of the comments received

- Respondents who supported the principle stated that broad community support is essential for an RIR to operate and to service resource holders
- Respondents who disagreed with this principle stated that community support risks delaying the establishment of a new RIR, and approval should not be sought from all resource holders
- Other comments stated that it is important that the Candidate RIR demonstrates capacity to meet regional demands.
- The "RIR community" needs definition; it should include stakeholders who might not be resource holders such as governments
- Some comments addressed the implementation of this principle, namely:
  - The process to validate community support is very important how will this be determined? What targets will be used?
  - Any process used to determine whether there is community support needs to be trustworthy

## Sample Comments

"Without doubt, broad support is important, but how this support is measured or validated remains unclear. Perhaps we should consider a principle that ensures mechanisms for validating community support"

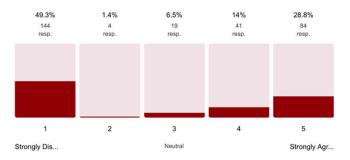
"It can be very difficult to determine 'support' and/or 'consensus' amongst resource holders in practice, and indeed this appears to exclude the role of governments in the process. ICP-1 relating to ccTLDs takes a more liberal approach to stakeholder communities."

"I strongly oppose this requirement. Delaying the recognition of an RIR based on Resource Holder support is illogical and could create barriers for emerging regions. The essential consideration should be the RIR's ability to meet the needs of the region." (Identical comment submitted multiple times)

# **Numerical Rating**

#### **Community Support**

292 out of 298 answered





# **Community Commitment**

A Candidate RIR must demonstrate that its community is willing to support the RIR, both financially and by actively participating in its governance.

## Summary of the comments received

- Comments in support of the principle highlighted the following:
  - · Community support is essential to a robust and resilient RIR
  - It ensures the long-term viability of the RIR
- Comments that disagreed with the principle stated that requiring community support could act as a hindrance to the establishment of an RIR
- Some comments highlighted concerns with the implementation of this principle:
  - It might be difficult to demonstrate financial backing prior to recognition
  - The criteria used to estimate community support need to be defined
  - There could be provisions for external support to a Candidate RIR during a transition period
- What is meant by "community" needs to be clearer; it is often used interchangeably with "resource holders"
- Other comments pointed out that there is a risk of power imbalances within communities, and those with the most funds or larger resource holders could prevail

## Sample Comments

"Both principles use the term "community", but in different meanings. In the former, community is set equal to the resource holders, in the latter it is not explicitly stated, but would traditionally go beyond the resource holders; this needs clarification"

"Community willingness to support financially and through participation is key. However, as indicated in a previous comment, a principle for transitional or external support to help such communities might strengthen inclusivity"

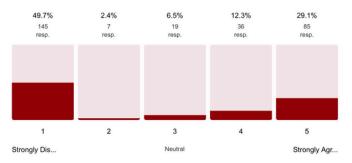
"What about the cases where the community wants to support, but the "big members" don't?"

"I find this requirement illogical. It would only delay the recognition of an RIR and create unnecessary barriers for emerging regions. The emphasis should be on the RIR's ability to meet the region's needs rather than obtaining approval from all stakeholders." (Comment submitted multiple times)

## **Numerical Rating**

#### **Community Commitment**

292 out of 298 answered



# Independence

An RIR must be financially stable and independent.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - RIRs should be able to serve a wide range of stakeholders without a conflict of interest
  - · Decisions should be based on the best interests of the community
  - This is essential for impartiality and the overall stability of the Internet ecosystem
- Some comments questioned what it means for an RIR to be independent, more specifically:
  - Independent from whom? Independence can mean operational independence, financial independence and/or political independence
  - How does collaboration or mutual support from other RIRs play into the concept of independence?
  - How does the RIR's relationship with its own community align with independence?
- Other comments were concerned with the ability of RIRs facing issues with financial stability and/or in emerging or underserved regions to meet this requirement
- The possible imbalance with larger members being able exert more influence within an RIR's community should also be addressed

## Sample Comments

"This is important to allow the RIR to serve a wide and diverse membership without conflicts of interests."

"This principle requires some clarification. What is meant by independent here? It should be made clear that independence means operational independence, in the sense that the RIR can operate and fulfill its mission without reliance on other RIRs or other organizations."

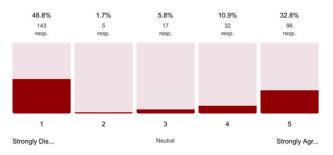
"Sometimes financially stable means interdependence. Maybe to be stable it has to enter into a mutual assistance agreement with other RIRs, is that independent?"

"Financial stability and independence allow RIRs to make decisions based on the best interests of the internet community, rather than being swayed by commercial or political pressures. This promotes impartiality and objectivity in resource allocation and policy development, contributing to the overall health and stability of the internet ecosystem."

# **Numerical Rating**



293 out of 298 answered



# Not-for-Profit

An RIR must operate on a not-for-profit basis.

# Summary of the comments received

- Comments in support of the principle shared the following advantages of the non-profit model:
  - This has been fundamental to ensuring that RIRs serve the best interest of their communities rather than develop vested interests
  - Supports the operation of services that serve the community
  - Ensures Internet number resources are managed in a fair, equitable and responsible manner
  - Driven by collective benefit over financial interests
  - Promotes fairness and transparency
  - Focus remains on serving the membership and community
  - Enables cooperation
  - No structural motivation to boost revenue or under-invest, unlike for-profits
- Some pointed out that RIRs could also benefit from being for-profits with advantages being:
  - Greater service efficiency or services to customers
  - Could innovate or grow further and attract investments
- Some comments pointed out that not-for-profits can have different structures; the definition of "not-for-profit" can vary
- The concept of social enterprise could be relevant to RIRs

## Sample Comments

"Operating an RIR on a non-profit basis is fundamental to ensuring that Internet resources are managed in a fair, equitable and responsible manner. This not only builds trust among members but also fosters a culture of cooperation and innovation in the Internet ecosystem."

"Any entity must be structured for the purpose of running the registry, not deriving a profit. A profit motive will drive behaviours that are not necessarily in the best interest of the resource holders or the smooth operation of the registry. A profit motive could mean the entity could dispose of the numbering resources and take up farming bananas or cryptocurrency were it deemed to be a better return."

"I believe that mandating an RIR to operate on a not-forprofit basis could hinder its capacity to innovate, grow, and secure essential resources for sustainability. A for-profit model might offer the flexibility needed for expansion, promote efficiency, and attract investments that enhance community service." (Comment submitted repeatedly)

# **Numerical Rating**



# **Corporate Governance**

An RIR must follow corporate governance procedures consistent with best practices in its jurisdiction.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - RIRs need to follow global principles in governance to ensure accountability irrespective of jurisdiction
  - There should be universal corporate governance requirements
- Some comments raised concerns about the dependence of RIRs on the jurisdictions in which they are established, particularly:
  - What happens if the corporate governance of a particular jurisdiction contradicts the ICP-2 requirements?
  - A large geographical area might have multiple conflicting corporate governance requirements; it is better for the RIRs to follow an internationally recognised code
  - Are there safeguards for RIRs and their staff if local jurisdictions stifle their operations?
- Several comments highlighted the need to choose a jurisdiction or for RIRs to have the ability to change jurisdictions if necessary
- One comment submitted multiple times said that compliance to corporate governance requirements could hinder RIR flexibility

## Sample Comments

"This is rather an unclear requirement, as in a large geo area there may be multiple conflicting corporate governance requirements. Rather select a small number of internationally-recognized CG governance codes and the RIR must choose one to follow."

"This is a silly question as there is no corporate "terra nullius". Even a theoretical extranational RIR under UN jurisdiction would need to follow UN best practices."

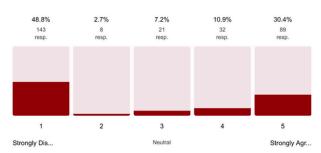
"Best practices should not be localised to jurisdiction, because they may not be well defined (or definable) within that context. In addition to local requirements, RIRs should collectively define minimal standards for governance by each RIR."

"This seems fine as long as the jurisdiction's corporate governance procedures are at the top end of the distribution. It would be helpful to require some global benchmarking and not just benchmark against the jurisdiction the RIR is incorporated in"

# **Numerical Rating**

#### **Corporate Governance**

293 out of 298 answered



# **Member-Controlled**

The majority of an RIR's governing body must be elected by the RIR's Members, and the governing body must maintain effective control over the RIR.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - This empowers the community to provide direction to the RIRs
  - This is democratic and fair
  - Supports decision-making in the best interests of the members and the broader Internet community
- Comments that disagreed with the principle stated that requiring the governing body to be elected could hinder flexibility
- Several comments addressed the implementation of the principle, chiefly:
  - This principle assumes that the RIRs will continue to be structured as membership organisations and effectively retains the existing status
  - It can be beneficial to have independent directors or those appointed by a NomCom
  - There need to be processes to validate member control
  - The distinction between processes that are membercontrolled and/or community-controlled need to be clarified, e.g. policy development

- "Effective control" should be better defined:
  - How would this be validated?
  - What exactly does it mean?
- Some highlighted the risks of capture:
  - The risk that membership is not diverse and gets concentrated in the hands of a few
  - Active participation is needed to prevent capture
  - Ensuring that the member control is trustworthy
- One comment pointed out that "member-controlled"
   contradicts the idea of multistakeholderism, as members are
   one stakeholder

# Member-Controlled (continued)

All RIRs shall jointly ensure that all areas on the globe continually receive RIR services.

## Sample Comments

"RIRs are truly member-driven organizations. By requiring that the majority of the governing body be elected by the members, it empowers the community to shape the direction and priorities of the RIR. Effective control over the RIR by the governing body guarantees that decisions are made in the best interests of the members and the broader internet community. This principle promotes accountability, transparency, and democratic governance within the RIR ecosystem."

"Should also establish third party legal audit to prevent people selling or buying members' votes."

"Concerned about how easy it is to capture control of an RIR with the limited community involvement that we see"

"This needs to be better detailed. It would actually be beneficial for RIRs to have independent members of the governing body particularly with respect to financial and legal oversight. Indeed this is considered good practice in the modern corporate world, but existing RIRs are still yet to implement this."

## **Numerical Rating**

#### Member-Controlled

293 out of 298 answered



# **Community-Driven**

An RIR must maintain a community-driven policy development process that is open, transparent, neutral, and publicly documented.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - The openness, transparency and public documentation of the policy development process (PDP) is important
  - The PDP must be accountable, fit for purpose and serve the needs of the community
  - The process should be driven by those who actually need and use resources
- As far as the implementation of this principle is concerned, comments pointed to the need for an enforcement mechanism to ensure that these principles are upheld and prevent the process from being hijacked
- One comment asked if there should be principles and processes that
   should not be subject to the policy development process
- Some comments suggested the following additions to the text of the principle:
  - Substantially community-driven
  - Bottom-up
  - Consensus-based
- Some comments pointed to the need to define what is meant by community
- Several comments, submitted repeatedly, appeared to conflate openness and transparency in policy development with revealing critical infrastructure. These comments were categorised as being 'offtopic'

## Sample Comments

"This is important in order to keep the RIR accountable and to allow those who actually need and use the number resources to determine the distribution policies."

"strong control to avoid hijacking of policy process"

"Community driven" should be included as one of the list of attributes of the policy development process, and phrased as "substantially community driven"."

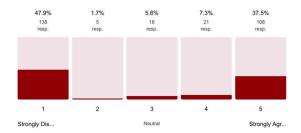
"I am extremely worried about these terms, each of which seems likely to be abused in the event of an effort to enforce any of it. But if the principles can't be enforced, they're not too meaningful."

"I strongly agree that an RIR must maintain a communitydriven policy development process that is open, transparent, neutral, and publicly documented. This approach ensures that the RIR is accountable, responsive, and inclusive, leading to more effective and legitimate policies. It fosters trust within the community, ensures fairness, and enables the RIR to adapt to the evolving needs of the internet ecosystem. Ultimately, these principles help to safeguard the integrity of the RIR and the broader internet governance ecosystem."

# Numerical Rating

#### Community-Driven

288 out of 298 answered





# Neutrality

An RIR must operate and apply its policies in a manner that is neutral and consistent.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - It is important to foster a level playing field
  - Ensuring the Internet remains accessible and open to all
  - Fundamental to trust and transparency
  - Ensures that policies are applied fairly
- Respondents that disagreed with this principle stated that flexibility in policy application was more important than neutrality
- Some comments asked for clarity about the context in which neutrality is being used. Neutrality with respect to what?
- Some suggested that neutrality is not always possible and that:
  - Rules should be applied consistently and any departures from the rules should be justified
  - Policies can't always be neutral but should promote the good of the community and the Internet
  - Any abuse of policies should be stopped
  - Impartiality might be a better approach than neutrality
- · Several comments highlighted the need for fairness
- · There needs to be a validation mechanism to ensure neutrality
- Neutrality also needs to be enforced; in the event of a violation, who would be the judge of this?
- There are also challenges to neutrality
- If significant funding comes from a small group of members, it might be difficult to be truly neutral
- The jurisdiction of the RIR might impact its ability to be neutral

# Sample Comments

"Consider changing "neutral" for "impartial" as neutral could be interpreted as being between two extremes while impartial means "not favoring one more than another""

"The policies must also be lawful, reasonable, proportionate and grounded in technical considerations over political nonsense. RIRs must further respect the legitimate commercial interests of members."

"RIRs maintain a neutral stance and avoid discriminatory practices in their operations and policy implementation. By operating in a consistent and impartial manner, RIRs can promote fairness and equity in the allocation and management of internet number resources. This neutrality is essential for fostering a level playing field and ensuring that the internet remains accessible and open to all."

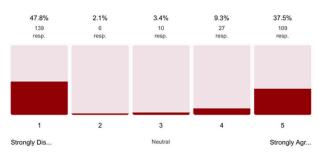
"Insisting on a completely neutral and consistent application of policies may overlook the unique challenges faced by different regions. Flexibility in policy application is essential for effective governance" (Comment submitted repeatedly)

# **Numerical Rating**

Neutrality

291 out of 298 answered

#### 2.9 Average rating



22

# Transparency

An RIR must maintain and publish comprehensive records of its governance, activities, and finances.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - Transparency is essential for good governance, demonstrating integrity, accountability and trustworthiness
  - Strengthens the public's trust in the reliability of RIRs
  - This allows stakeholders to review the RIR's actions
  - Enhances RIR accountability for all stakeholders
- There need to be whistleblower protections and RIRs should not have NDAs or confidentiality agreements to cover malfeasance
- "RIR" here refers to the legal entity/secretariat while in other parts of the document it refers to the community as well; this should be clarified
- Comments that touched upon the implementation of this principle pointed out that:
  - Some aspects of RIR operation might require confidentiality, however there should be a mechanism to review the RIR's decision not to publish or redact certain documents
  - There should be third-party audits
- A comment submitted repeatedly stated that transparency could be an undue burden on RIRs, who should have the flexibility to determine the level of transparency

## Sample Comments

"RIRs may not have improper NDAs and similar restraints on communication designed to cover over malfeasance. Clear whistleblower protections are imperative."

"This is essential for demonstrating integrity and trustworthiness."

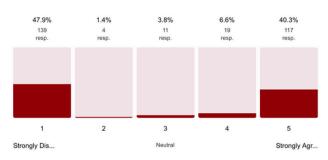
"This, like the other principles of governance above, are essential for good governance of not-for-profit organisations."

"Requiring comprehensive records on governance and activities may impose unnecessary burdens on RIRs, diverting focus from their primary responsibilities. RIRs should have the freedom to determine appropriate transparency levels." (Comment submitted repeatedly)

# **Numerical Rating**

#### Transparency

290 out of 298 answered



# Audit

An RIR must participate in regular audits by an external and independent auditor to ensure that it is continuing to comply with ICP-2.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - Audits are essential for demonstrating integrity and trustworthiness
  - This helps to identify and address potential issues early on
  - Enhances the accountability of the RIR system
  - Ensures transparency and compliance with regulations and ICP-2
- RIRs shouldn't just participate in audits but should pass the audits and take curative action if needed
- Comments regarding the implementation of the audit suggested:
  - Ideal frequencies for the audit; several recommendations were made
  - The audit should also cover registry operations, technical operation and security compliance, beyond the financial audit
  - The auditors should be independent and there should be no manipulation in selecting the vendors/auditors
  - More details are needed on who will actually appoint the auditors and carry out the audit
- · Some comments pointed to the need for community oversight
- Smaller/new RIRs might need financial or other support to manage audits
- A comment submitted repeatedly stated that audits could place an undue burden on RIRs

# Sample Comments

"Agree because this project is very important for the future" "RIRs must pass audits, not just participate. All negative findings resulting from an audit must be cured within a reasonable amount of time. Failure to cure the negative findings can result in de-recognition."

"Due to the complexity and unique nature of an RIRs function, how can it be ensured that the audit also covers technical compliance and security as well as financial transactions?"

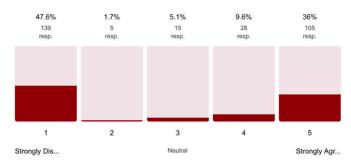
*"Who would do the auditing or appoint the auditors? Again, more detail needed around the actual implementation."* 

"Mandating regular external audits could place undue financial and administrative stress on RIRs, particularly those in smaller or emerging regions with limited resources. These audits may not effectively address compliance with ICP-2 and could detract from core responsibilities." (Comment submitted repeatedly)

# **Numerical Rating**

Audit

292 out of 298 answered



# Service

An RIR must provide stable, reliable, secure, accurate, and accountable allocation, registration, and directory services, as well as related technical services, using standard protocols and specifications for cross-RIR compatibility.

## Summary of the comments received

- Comments in support of the principle highlighted the following:
  - RIRs must uphold these standards for the global Internet system to thrive
  - Using standard protocols and ensuring cross-RIR compatibility supports seamless communication
- Some comments felt this principle was too detailed and is related to the implementation of an RIR's functions:
  - The NRO should establish a global baseline to evaluate these services
  - Improving inter-RIR compatibility is a process not a principle
  - The basic service catalogue of an RIR should be defined
  - Some comments referred to the roles of RIR staff they need to have the right technical expertise
- One comment submitted repeatedly stated that mandating cross-RIR compatibility could be unrealistic, overly restrictive or demanding

## Sample Comments

"Yes, their raison d'etre"

"The level of detail goes beyond the level of principle and would significantly benefit from a rationale or implementation note"

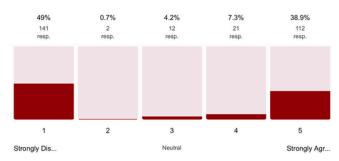
"I fully agree with this principle. Providing stable, reliable, secure, accurate, and accountable services is fundamental for an RIR to effectively manage Internet resources and meet the needs of its community. Adhering to standard protocols and specifications ensures cross-RIR compatibility, enabling seamless coordination and communication across regions. This is essential for maintaining the global integrity of the Internet's resource allocation system and for ensuring that stakeholders can trust the services provided by the RIR."

*"Inter-RIR compatibility and coordination has always been a problem. Reducing the mess is a process, not an edict."* 

# **Numerical Rating**

Service

288 out of 298 answered



# Continuity

An RIR must provide stable, reliable, secure, accurate, and accountable allocation, registration, and directory services, as well as related technical services, using standard protocols and specifications for cross-RIR compatibility.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - It supports the globally-coordinated RIR system
  - It helps mitigate the impact of disruptions to an RIR
  - It ensures service delivery in the case of unforeseen challenges
  - It safeguards the overall resilience and stability of the RIR system
  - This principle allows other principles to become viable
- Other comments focused on how this could be implemented:
  - The need to develop handover principles in order to implement this
  - There could be multiple RIRs performing functions should continuity be required
  - There needs to be shared documents and processes that have been tested, for example, in table top exercises as well as public information
  - This is likely to be a significant project to implement
  - What would happen if an RIR were to refuse to cooperate

- Comments also highlighted concerns with record sharing:
  - A form of escrow might be more appropriate in some cases
  - This potentially breaches member confidentiality with RIRs
  - RIRs should not assume ownership of records; member data belongs to members
- This principle might contradict the independence of RIRs
- Another comment said this provides a strong argument for a centrally operated registry
- A comment submitted repeatedly stated that mandating record sharing might pose a burden on RIRs



# Continuity (continued)

An RIR must provide stable, reliable, secure, accurate, and accountable allocation, registration, and directory services, as well as related technical services, using standard protocols and specifications for cross-RIR compatibility.

## **Sample Comments**

"Good for resilience. Pleased to see it is with another RIR, not with ICANN."

"I feel this addition is crucial to enabling the other suggested revisions to be viable. If the other RIRs are unable to build continuity procedures, the process of decertification is significantly more difficult and less likely to be a viable deterrent for malfeasance and noncompliance."

*"Record sharing is also key to ensuring that, in case of an emergency, another RIR can step in"* 

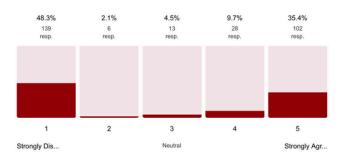
"This could be useful for enhancing the resilience of the globally-coordinated RIR system. Handoff principles would need to be developed."

"While continuity is crucial, mandating record sharing may impose undue burdens on RIRs, especially in smaller regions. A more adaptable approach is necessary for effective governance." (Comment submitted repeatedly)

## **Numerical Rating**

#### Continuity

288 out of 298 answered



# Anti-Capture

An RIR must maintain governance rules and controls to prevent itself from becoming captured.

# Summary of the comments received

- Comments in support of the principle highlighted the following concerns:
  - The definition of "capture" needs to be defined more clearly
  - Who would be considered the capturing party
  - What the mechanisms of capture might be
- Another consideration is how an RIR would be considered to be captured, that is, the validation of capture
- Some comments raised concerns about the ability of vested interests and money to influence or capture RIRs, and cautioned that a vague anti-capture principle could be misused by bad actors
- Many comments addressed the complexity of implementing this principle
- Comments submitted repeatedly stated that RIRs should establish strong governance to prevent capture and remain decentralized

## **Sample Comments**

"Be clear about what 'captured' means. The preceding principles could lead some to say that the system is captured already, by its own users."

"Definitions here are tricky. How do we demonstrate that an RIR has not been captured? If an RIR's membership/board is taken over by some miscreant, it will be hard to amend ICP-2."

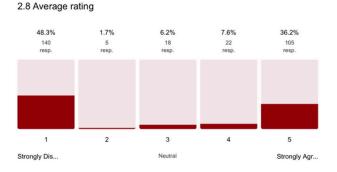
"The principles of transparency and community and membership engagement in the RIR's governance processes are important prerequisites for this principle."

"An RIR must establish strong governance frameworks to prevent capture, ensuring that its operations are accountable to its community and reflect their interests and needs." (Comment submitted repeatedly)

# **Numerical Rating**

Anti-Capture

290 out of 298 answered



# **Ecosystem Stability**

Each RIR must cooperate to ensure the ongoing operation and stability of the global Internet number registry system and must not operate or fail to operate in any manner that threatens such stability.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - It provides a basis for assigning resources to ensure collaboration and coordination between the RIRs
  - It has a positive impact on the Internet technical community as a whole
  - It contributes to overall health, resilience and sustainability of Internet infrastructure
  - A single, global Internet is essential; this could help prevent Internet fragmentation
  - RIRs can ensure alignment in policies and technical systems, minimising disruptions
  - It is vital to support the global system
- A comment suggested including "security" in the principle
- Some comments highlighted the validation and implementation of this principle:
  - How will "cooperation" or "stability" be measured?
  - Who would measure or validate these?
  - How would a "manner that threatens stability" be defined?
  - How would this be evaluated in practice?
  - The consequences of failure to uphold this principle or act in the expected manner need to be defined.
- A comment submitted repeatedly stated that global standards might pose a burden on RIRs

## Sample Comments

"The alternative to this is a deeply troubling scenario, hence the principle is vital."

"As with anti-capture, this proposed principle is conceptually appealing, however implementation would depend on how "cooperation" and "stability" are interpreted, how those terms are measured, and who measures them."

"By acting in unison, RIRs can ensure that policies and technical systems are aligned, providing consistency and preventing disruptions."

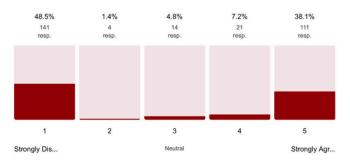
"How do we know what the manner that does not threaten stability is?"

"I think RIRs should focus on their own operations rather than being compelled to cooperate. A global standard could create burdens that are not practical for them." (Comment submitted repeatedly)

# **Numerical Rating**

#### **Ecosystem Stability**

291 out of 298 answered



# **Remedial Bias**

ICANN and all other RIRs must provide all reasonable support, if requested, to assist an RIR to cure any failure to comply with ICP-2 before derecognizing the RIR.

# Summary of the comments received

- Comments in support of the principle highlighted the following:
  - It supports long-term compliance
  - It prioritises support and remediation over punitive measures
  - It aims to minimise disruption while encouraging cooperation
  - It allows RIRs to correct failures
- "Reasonable" support needs a clearer definition as do timelines
- Several comments stated that providing support is more important than derecognition, and that derecognition should be a last resort
- There is possibly a contradiction with the "independence" principle, which suggests that ICANN and other RIRs should not be responsible to cure failure
- There is a conflation of roles ICANN and the RIRs must both offer support and also be the judge of whether or not the failures have been cured

- There were several comments about providing support:
  - Some comments suggested that support should not be offered in cases of mismanagement, malfeasance or financial negligence
  - What if members of other RIRs do not want their RIR to offer support or consider it an inappropriate use of their funds
  - Deliberate violations might require a different approach
- Some comments said that RIRs that cannot comply should be allowed to fail
- There were several comments pertaining to the implementation of this principle:
  - What would happen in case of capture and if an RIR is unable to request support?
  - What if the RIRs fail to comply with the request for support?
  - What if the RIR being supported refuses to acknowledge the derecognition?
- The phrasing of "remedial bias" is unfamiliar or unclear



# **Remedial Bias (continued)**

ICANN and all other RIRs must provide all reasonable support, if requested, to assist an RIR to cure any failure to comply with ICP-2 before derecognizing the RIR.

## **Sample Comments**

"I think there is some conceptual inconsistency here. The RIR should be financially independent and responsible to the member per the governing structure. If that is so, icann and other RIR should not have the absolute responsibility/liability to cure its failure. To cure the failure, one must look into it cause of failure and implement/recommend certain changes or provide financial relief, this would then affect the independence and impact its self governance nature. ICANN should only look into its compliance of ICP2, and RIR should remain independent. Any assistance to cure failure should be voluntary and not a "must"."

"A principle emphasizing collaborative remediation with clear timelines might strengthen this"

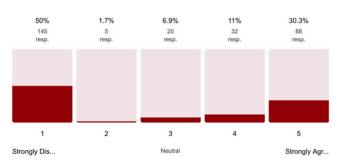
"+1: Fixing is more important than derecognition"

"While a remedial bias is appropriate ICANN cannot conflate its supervision function with its support functions. Moreover the principle is unclear on who makes the assistance required. A better principle is: Prior to derecognition of an RIR for non-Compliance every effort to attain compliance from the RIR must be afforded by all participants in the global Internet ecosystem."

# **Numerical Rating**

#### **Remedial Bias**

290 out of 298 answered



# Handoff

A Derecognized RIR must cooperate with ICANN and other RIRs to ensure the smooth transfer of its operations to a successor or interim entity designated in any derecognition decision.

# Summary of the comments received

- Some comments suggested that this principle is redundant as it is covered under the Continuity principle
- Comments in support of the principle highlighted the following concerns about its implementation, namely:
  - There is no remedy if a derecognized RIR refuses to cooperate with the transfer of its operation
  - This principle assumes that the derecognized RIR is functional and capable of cooperating with the transfer of its operations, which might not be the case
  - The derecognized RIR should not interfere with or resist the transfer of operations
  - There should be a due process when audits take place so that transfers can take place in case of derecognition without interference
  - The resources and services that get handed over need to be defined
  - There needs to be a legal and/or policy provision to allow the operations of a non-cooperative, derecognized RIR to be taken over

- Some comments pointed out that the overall trust in the RIR system will be reduced in such a situation; it could cause instability in the region concerned
- A comment asked at what point a Derecognized RIR is excluded from the decision-making and operations of the NRO
- A comment submitted repeatedly disagreed with the principle, stating that the transfer of operations undermines RIR autonomy



# Handoff (continued)

A Derecognized RIR must cooperate with ICANN and other RIRs to ensure the smooth transfer of its operations to a successor or interim entity designated in any derecognition decision.

## Sample Comments

"A Derecognized RIR is likely to be unable (or unwilling) to cooperate, since it has already demonstrated it is unable to comply with other terms of this ICP-2. Further, this is impossible to enforce, since the subject RIR has already been Derecognized. At what point is a Derecognized RIR excluded from the NRO? The RIR Coordination committees? At what point is a Derecognized RIR no longer an RIR for purposes of the other principles?"

"This is conceptually fine but it strongly implies that the derecognized RIR would be fully functioning, with a Board, staff, systems, and funds. This is not a reasonable expectation for a failing organization. The principle, or its implementation, must take account of the fact that a failing organization is likely to be broken in at least one of those ways."

"I simply don't understand how one can enact such a contract. What if they say no? What do you do then?"

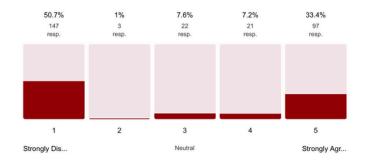
"Prior to assisting a derecognized RIR in rectifying compliance failures with ICP-2, ICANN and other RIRs must seek the consent of all current members. This ensures that member rights are respected before any derecognition discussions." (Comment submitted repeatedly)

"I strongly oppose this provision. Forcing a Derecognized RIR to cooperate with a successor disregards its contributions and autonomy. This could disrupt regional stability by imposing an unfamiliar entity without community trust." (Comment submitted repeatedly)

# **Numerical Rating**

Handoff

290 out of 298 answered



# **General Comments**

We thank everyone who had the patience to submit additional feedback on the ICP-2 update process after this fairly lengthy questionnaire. The general comments covered a wide range of topics and a summary cannot do justice to them. We have shared a short selection of feedback we found particularly useful at present.

# Summary of the comments received

- Process
  - Some commenters appreciated the specificity of the questionnaire format
  - Respondents need to be given more time to provide feedback, particularly organisations that might require legal reviews prior to sharing input
  - A more structured approach over an ad hoc one is preferred
  - The methodology used here did not allow for the consideration of other RIR structures nor did it recognise the existing architectural model of the system
  - A questionnaire has limitations, there might be topics that are relevant that are not covered by the questions
- Engagement with the communities
  - The RIR communities would like to have greater insight into the work of the NRO NC and more sustained opportunities for engagement
  - Communities should have the opportunity to contribute to this process

- Implementation considerations
  - The implementation of ICP-2 is likely to be complex and will require careful detailing, as will the updated text of ICP-2
  - The RIR system is yet to evolve a dispute resolution mechanism along the lines of ICANN

## • The bigger picture

- Accountability and ethics need to be mentioned explicitly in ICP-2
- The RIR system needs to be considered within the larger framework of the evolution of institutions, external forces, jurisdictional issues and the development of technology
- Outer space could be considered a region

The general comments can be viewed in detail in the raw data files.

# **Conclusion and Next Steps**

This summary of the community input received through the questionnaire is one part of the NRO NC's larger process of reviewing and updating ICP-2. The summary document shows a sample of the comments received; the full set of comments is available on the NRO website. We hope this summary will give readers a sense of the range and depth of the feedback received and we would like to reiterate that all comments received have been read and reviewed, even if they have not been referred to in this summary.

As stated in the introduction, the task of the NRO NC is to update ICP-2; the implementation of the updated criteria is not within the scope of its activities. However, comments that are currently out of scope because they relate to the future implementation of ICP-2 are valuable, and we thank the contributors for their willingness to engage in the process of bringing these proposed principles to reality.

Over the coming weeks, the NRO NC will report back to the RIR and ICANN communities on the input received through this questionnaire and the ICANN public comment process. The feedback is being discussed by the NRO NC, and will inform the drafting process of the next version of ICP-2. A draft version of the updated document will then be shared for further community discussion and feedback.

Once again, we extend our thanks to all respondents for their insights and effort in answering this questionnaire. We look forward to engaging in these vital discussions as we continue the process of reviewing and updating ICP-2.

The NRO NC 24 February 2025 Each RIR has three representatives on the NRO NC. The NRO NC consists of:

- Maemura Akinori (APNIC)
- Nicole Chan (APNIC)
- Di Ma (APNIC)
- Amy Potter (ARIN)
- Nick Nugent (ARIN)
- Kevin Blumberg (ARIN)
- Ricardo Patara (LACNIC)
- Esteban Lescano (LACNIC)
- Jorge Villa (LACNIC)
- Hervé Clément (RIPE NCC)
- Constanze Bürger (RIPE NCC)
- Andrei Robachevsky (RIPE NCC)

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