



**The Proposed ICP-2  
Version 2 Principles  
Questionnaire**  
Filtered Dataset

This document contains the unique text responses and open comments received in the response to the draft ICP-2 principles questionnaire open from 18 November to 6 December 2025. Duplicate responses have been removed and a note on the data filtering is included.

**The Number Resource Organization  
Number Council (NRO NC)**

# The ICP-2 Version 2 Principles Questionnaire (Filtered Dataset)

Text responses ordered by principle and level of agreement

## Note on data filtering for repeat and empty responses

A high number of repeat responses were submitted through the course of the survey, most likely generated with AI-based tools (checks in both ChatGPT and undetectable.ai also indicated that AI tools had been used).

Given the volume of data to be cleaned, we ran a clustering analysis to identify repeat rows.<sup>1</sup> According to that analysis, approximately 150 of the 298 responses received belonged to clusters of highly similar responses. Here's a partial example of one of the clusters identified:

First name	Last name	Company	Authority
Armando	Louis	Angola telecom	I strongly disagree with the principle outlined above, particularly the provision that gives ICANN final authority over the recognition or derecognition of an RIR, despite...
Guillaume	Masra	Danon's group	I strongly disagree with the principle outlined above, particularly the provision that gives ICANN final authority over the recognition or derecognition of an RIR, despite...
Armando	Louis	Angola telecom	I strongly disagree with the principle outlined above, particularly the provision that gives ICANN final authority over the recognition or derecognition of an RIR, despite...
Filston	SIBOMANA	Onatel	I strongly disagree with the principle outlined above, particularly the provision that grants ICANN final authority over the recognition or with drawal of recognition of a...
Eric	Boro	North Star..	I strongly disagree with the principle outlined above, particularly the provision that grants ICANN final authority over the recognition or with drawal of recognition of a...

In order to make the analysis of the survey results easier and more effective, this document excludes responses that belonged to these clusters. We also took some effort to remove responses that were not useful (e.g., "yes", "okay", "no", "no comment") or that merely repeated the 'level of agreement' already indicated (e.g., "5", "agree", "strongly disagree").

A document containing all text responses to the survey is available, as well as a CSV file highlighting the rows of the original results that were excluded here.

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<sup>1</sup> We used the deep learning model, BERT (Bidirectional Encoder Representations from Transformers) to identify clusters of highly similar responses. To implement this, we used the Transformers package in Python, which provides pre-trained BERT models and tools for processing text. Outputs were also checked manually. **It should be noted that there is a possibility for both false positives and false negatives** - but this process has helped to quickly filter out large groups of similar responses and is a best effort attempt at making sure that further analysis of the survey results can focus on unique responses.

# Table of Contents

- 1. Authority ..... 6
  - 1.1. Authority - Strongly Agree (5) ..... 6
  - 1.2. Authority - Somewhat Agree (4) ..... 8
  - 1.3. Authority - Neutral (3) ..... 10
  - 1.4. Authority - Somewhat Disagree (2) ..... 12
  - 1.5. Authority - Strongly Disagree (1) ..... 13
- 2. Amendment ..... 16
  - 2.1. Amendment - Strongly Agree (5) ..... 16
  - 2.2. Amendment - Somewhat Agree (4) ..... 17
  - 2.3. Amendment - Neutral (3) ..... 19
  - 2.4. Amendment - Somewhat Disagree (2) ..... 20
  - 2.5. Amendment - Strongly Disagree (1) ..... 21
- 3. Rectification ..... 23
  - 3.1. Rectification - Strongly Agree (5) ..... 23
  - 3.2. Rectification - Somewhat Agree (4) ..... 24
  - 3.3. Rectification - Neutral (3) ..... 27
  - 3.4. Rectification - Somewhat Disagree (2) ..... 27
  - 3.5. Rectification - Strongly Disagree (1) ..... 28
- 4. Coverage ..... 30
  - 4.1. Coverage - Strongly Agree (5) ..... 30
  - 4.2. Coverage - Somewhat Agree (4) ..... 34
  - 4.3. Coverage - Neutral (3) ..... 35
  - 4.4. Coverage - Somewhat Disagree (2) ..... 35
  - 4.5. Coverage - Strongly Disagree (1) ..... 35
- 5. Service Region ..... 37
  - 5.1. Service Region - Strongly Agree (5) ..... 37
  - 5.2. Service Region - Somewhat Agree (4) ..... 40
  - 5.3. Service Region - Neutral (3) ..... 41
  - 5.4. Service Region - Somewhat Disagree (2) ..... 42
  - 5.5. Service Region - Strongly Disagree (1) ..... 43
- 6. Recognition ..... 45
  - 6.1. Recognition - Strongly Agree (5) ..... 45
  - 6.2. Recognition - Somewhat Agree (4) ..... 47
  - 6.3. Recognition - Neutral (3) ..... 48
  - 6.4. Recognition - Somewhat Disagree (2) ..... 49
  - 6.5. Recognition - Strongly Disagree (1) ..... 49
- 7. Operation ..... 50

7.1.	Operation - Strongly Agree (5)	50
7.2.	Operation - Somewhat Agree (4)	52
7.3.	Operation - Neutral (3)	53
7.4.	Operation - Somewhat Disagree (2)	53
7.5.	Operation - Strongly Disagree (1)	54
8.	Derecognition	55
8.1.	Derecognition - Strongly Agree (5)	55
8.2.	Derecognition - Somewhat Agree (4)	57
8.3.	Derecognition - Neutral (3)	59
8.4.	Derecognition - Somewhat Disagree (2)	59
8.5.	Derecognition - Strongly Disagree (1)	60
9.	Community Support	62
9.1.	Community Support - Strongly Agree (5)	62
9.2.	Community Support - Somewhat Agree (4)	63
9.3.	Community Support - Neutral (3)	65
9.4.	Community Support - Somewhat Disagree (2)	65
9.5.	Community Support - Strongly Disagree (1)	66
10.	Community Commitment	67
10.1.	Community Commitment - Strongly Agree (5)	67
10.2.	Community Commitment - Somewhat Agree (4)	68
10.3.	Community Commitment - Neutral (3)	69
10.4.	Community Commitment - Somewhat Disagree (2)	70
10.5.	Community Commitment - Strongly Disagree (1)	70
11.	Independence	72
11.1.	Independence - Strongly Agree (5)	72
11.2.	Independence - Somewhat Agree (4)	74
11.3.	Independence - Neutral (3)	75
11.4.	Independence - Somewhat Disagree (2)	75
11.5.	Independence - Strongly Disagree (1)	76
12.	Not-for-Profit	77
12.1.	Not-for-Profit - Strongly Agree (5)	77
12.2.	Not-for-Profit - Somewhat Agree (4)	79
12.3.	Not-for-Profit - Neutral (3)	80
12.4.	Not-for-Profit - Somewhat Disagree (2)	81
12.5.	Not-for-Profit - Strongly Disagree (1)	81
13.	Corporate Governance	83
13.1.	Corporate Governance - Strongly Agree (5)	83
13.2.	Corporate Governance - Somewhat Agree (4)	85

13.3.	Corporate Governance - Neutral (3).....	85
13.4.	Corporate Governance - Somewhat Disagree (2) .....	86
13.5.	Corporate Governance - Strongly Disagree (1) .....	87
14.	Member-Controlled .....	88
14.1.	Member-Controlled - Strongly Agree (5).....	88
14.2.	Member-Controlled - Somewhat Agree (4).....	89
14.3.	Member-Controlled - Neutral (3) .....	90
14.4.	Member-Controlled - Somewhat Disagree (2) .....	91
14.5.	Member-Controlled - Strongly Disagree (1) .....	91
15.	Community-Driven .....	93
15.1.	Community-Driven - Strongly Agree (5) .....	93
15.2.	Community-Driven - Somewhat Agree (4) .....	95
15.3.	Community-Driven - Neutral (3).....	96
15.4.	Community-Driven - Somewhat Disagree (2).....	96
15.5.	Community-Driven - Strongly Disagree (1).....	97
16.	Neutrality.....	98
16.1.	Neutrality - Strongly Agree (5).....	98
16.2.	Neutrality - Somewhat Agree (4).....	100
16.3.	Neutrality - Neutral (3) .....	100
16.4.	Neutrality - Somewhat Disagree (2) .....	101
16.5.	Neutrality - Strongly Disagree (1) .....	101
17.	Transparency.....	102
17.1.	Transparency - Strongly Agree (5) .....	102
17.2.	Transparency - Somewhat Agree (4) .....	104
17.3.	Transparency - Neutral (3).....	104
17.4.	Transparency - Somewhat Disagree (2).....	104
17.5.	Transparency - Strongly Disagree (1).....	105
18.	Audit .....	106
18.1.	Audit - Strongly Agree (5) .....	106
18.2.	Audit - Somewhat Agree (4) .....	108
18.3.	Audit - Neutral (3).....	109
18.4.	Audit - Somewhat Disagree (2).....	109
18.5.	Audit - Strongly Disagree (1).....	109
19.	Service .....	111
19.1.	Service - Strongly Agree (5) .....	111
19.2.	Service - Somewhat Agree (4) .....	112
19.3.	Service - Neutral (3).....	112
19.4.	Service - Somewhat Disagree (2).....	113

19.5.	Service - Strongly Disagree (1) .....	113
20.	Continuity .....	114
20.1.	Continuity - Strongly Agree (5) .....	114
20.2.	Continuity - Somewhat Agree (4) .....	115
20.3.	Continuity - Neutral (3) .....	116
20.4.	Continuity - Somewhat Disagree (2) .....	116
20.5.	Continuity - Strongly Disagree (1) .....	116
21.	Anti-Capture .....	118
21.1.	Anti-Capture - Strongly Agree (5) .....	118
21.2.	Anti-Capture - Somewhat Agree (4) .....	121
21.3.	Anti-Capture - Neutral (3) .....	121
21.4.	Anti-Capture - Somewhat Disagree (2) .....	122
21.5.	Anti-Capture - Strongly Disagree (1) .....	122
22.	Ecosystem Stability .....	124
22.1.	Ecosystem Stability - Strongly Agree (5) .....	124
22.2.	Ecosystem Stability - Somewhat Agree (4) .....	126
22.3.	Ecosystem Stability - Neutral (3) .....	126
22.4.	Ecosystem Stability - Somewhat Disagree (2) .....	126
22.5.	Ecosystem Stability - Strongly Disagree (1) .....	127
23.	Remedial Bias .....	128
23.1.	Remedial Bias - Strongly Agree (5) .....	128
23.2.	Remedial Bias - Somewhat Agree (4) .....	129
23.3.	Remedial Bias - Neutral (3) .....	130
23.4.	Remedial Bias - Somewhat Disagree (2) .....	131
23.5.	Remedial Bias - Strongly Disagree (1) .....	132
24.	Handoff .....	133
24.1.	Handoff - Strongly Agree (5) .....	133
24.2.	Handoff - Somewhat Agree (4) .....	135
24.3.	Handoff - Neutral (3) .....	136
24.4.	Handoff - Somewhat Disagree (2) .....	136
24.5.	Handoff - Strongly Disagree (1) .....	136
25.	Other comments or feedback .....	138

# 1. Authority

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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.

## 1.1. Authority - Strongly Agree (5)

It is critical to have a process to decognise an RIR. It is not only practical but also from a governance perspective, the whole governance structure becomes meaningless if the higher structure dies but gave any power to remove the responsibility/authority given

**Alban Kwan (CSC)**

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Fellow RIRs are better placed to assess the performance, compliance and functionality of a peer.

**Brian Longwe (Converged Technology Networks)**

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ICANN should have the final say in deciding to go ahead or not.

**Emma Perrier (AFRINIC Ltd)**

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These seem the most appropriate bodies for such recognition

**Narelle Clark (Internet Association of Australia)**

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Need we mention the current chaos in Afrinic, the perfect example of when this should happen.

**Warwick Ward-Cox (Network Platforms)**

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At this time I agree the third party can be ICANN but that is only because I do not see another suitable option at this time. However, if there was a more suitable option identified, this could be considered.

**Paul Rendek (DSTREAM GROUP)**

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Yes, and ICANN should give its reason whatever case.

**Kuo Wu (TWIGF)**

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The principle establishes a balance of authority between the NRO EC and ICANN. The NRO EC has direct insights into regional needs, while ICANN has a global oversight role. This layered approach ensures that no single entity has unilateral control, preserving checks and balances. By allowing the NRO EC to initiate recognition or derecognition proposals, this principle ensures that regional voices are heard before ICANN makes a final decision, fostering inclusive and representative governance. While regional perspectives are vital, ICANN's final authority ensures that any major decisions adhere to global policies and standards, like those set out in ICP-2. This structure helps maintain stability and consistency in the internet's governance framework across regions, avoiding fragmentation or

conflicts that might arise if each RIR had autonomous decision-making power. Requiring ICANN to consult with each RIR and give substantial consideration to their input before finalizing any decision ensures a collaborative process. This step is crucial for maintaining a healthy, trust-based relationship between ICANN and the RIRs, fostering open communication and reducing potential conflicts. The requirement of majority voting within the NRO EC introduces transparency and accountability into the process. A majority vote implies that any proposal reflects broad consensus rather than isolated interests, and ICANN's subsequent decision-making is also held to a high standard by requiring them to engage with RIRs and consider their perspectives. The internet's growth and evolution rely on a coordinated approach to resource distribution and policy enforcement. This principle helps prevent hasty or biased decisions regarding the status of RIRs, safeguarding the coordinated system that is essential for a stable, global internet.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

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It's ICANN reviews

**Rita Kumi (Ghana Telecommunication Company)**

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I think this is a great graduated way of handling this so the outcome cannot easily be manipulated.

**Raymond Mamattah (EGIGFA)**

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Sufficient provision for consultation and review of adherence to the ICP-2

**Russell Woruba (PNG Department of ICT)**

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je suis totalement d'accord

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

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I agree in the oversight by ICANN, but am concerned about accountability if ICANN in exercising its sole authority

**Jeff Neuman (JJN Solutions, LLC)**

---

Please clarify if this means a veto right for ICANN and who has final authority to decide over dispute if the candidate meets ICP-2

**Joerg Dorchain (private)**

---

It is very important to have a balance of the bottom-up flavour and some control by people vested from the community who master the system and understand the importance of the resources to keeping the Internet up and running.

**Musa Stephen HONLUE (AFRINIC)**

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Other bodies should also have the right to propose a candidate

**Elvis Velea (V4Escrow LLC)**

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That make sense

**Adiel Akplogan (iNetSys)**

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Add wording noting that each EC member should be reflecting a broad consensus in their region

**Leo Vegoda (And Polus LLC)**

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It's not clear in the glossary who in ICANN (which committee/group/department) has the power for final adoption so I suggest the text to be modified as following: ICANN Board shall have the final authority ... till the end of text.

**Haitham El Nakhal (National Telecom Regulatory Authority)**

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Adding or removing an RIR in the overall the Internet Number Resource Management scheme is very substantial for the management of each RIRs, therefore it should be appropriate that NRO EC determines to propose it to ICANN, given such condition in terms of support of prospective LIRs and NRO NC and the broader community have been gained. With that, I found that the current ASO-MoU stipulates at its 4-b-2 that ASO AC has the organizational role for providing recommendations to the Board of ICANN concerning the recognition of new RIRs, hence we will need to work on revising ASO MoU to fit it to the revised ICP-2, with a number of revisions seem to be needed.

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

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I've many doubts about if also the RIR community may be able to ask for a derecognition process

**Jordi Palet Martinez (The IPv6 Company)**

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## **1.2. Authority - Somewhat Agree (4)**

In the absence of an input from an RIR (as may be the case from AFRINIC for example), then the input should come from GAC members in countries covered by the RIR.

**Babagana Digima (Nigerian Communications Commission)**

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The decision to recognise or derecognise an RIR will have profound implications for communities impacted by the decision, and it is vital that they have a meaningful say in these processes. In the next version of ICP-2, the ASO AC should consider ways to ensure that the whole community (government, the private sector, technical community, civil society and academia), can provide meaningful input into the NRO EC vote on recognition or derecognition of an RIR, and into ICANN's decision of whether or not to adopt the proposal. The ASO AC and ICANN should consider requirements for documenting consultations between ICANN and the RIRs, and the reasons for any decisions. There should also be appropriate appeals processes for decisions to recognise or derecognise an RIR by the NRO EC or ICANN.

**Ian Sheldon (Australian Government - Department of Infrastructure, Transport, Regional Development, Communications and the Arts)**

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Gives RIRs complete control over recognition or de-recognition. What if a cartel has emerged?

**Jordan Carter (auDA)**

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There should give consideration for the members to be able to nominate/ suggest a new applicant

**Colwayne Babb (Cable and Wireless)**

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I strongly disagree. Giving ICANN final authority undermines decentralization and risks overriding RIR autonomy

**Noel OUPOH (DATACONNECT AFRICA)**

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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.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

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If ICANN's decision diverges from the recommendations provided by the RIRs, it should justify this divergence in writing.

**Cameron Smith (Bubble Cloud Mozambique S.A.)**

---

NRO EC should be main authority to recognize/derecognize an RIR

**Mohammad Kawsar Uddin (Daily Sangbad)**

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The principle of ICANN having final authority is reasonable as far as it safeguards against unilateral decision-making by ICANN for decisions affecting recognition or derecognition.

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

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The balance here is delicate. I think it would be bad if ICANN rejected a full proposal from the NRO EC on this, but the legitimacy can only come from ICANN.

**Brian Nisbet (HEAnet CLG)**

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Majority vote is important

**John Haydon (Education)**

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The requirement for ICANN to give "substantial consideration" to each RIR's input is not clearly defined, creating some uncertainty in how it should be applied. It's unclear what specific actions ICANN must take to show that it has given this level of attention. Adding criteria or guidelines for ICANN to follow could help make this process more transparent and accountable. Additionally, introducing a way for RIRs to challenge decisions if they feel their input wasn't fully considered could improve the fairness of this process.

**Anastasia Kleiman (Voldeta)**

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ICANN still has some independence and bias issues; I'd be more happy to place stronger bias on the NRO EC but the suggested approach is fine.

**David Lamparter (Westnetz w.V.)**

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I am in favor of the proposal.

**Erika del carmen Garay Obando (IBW)**

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one needs to be careful about this being an EC role. Or more importantly how that vote is taken and what percentage is needed to be effective. I also think that the ASO-AC/NRO-EC should be involved here from a community representationperspective.

**Saul Stein (eNetworks)**

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

**Brian Jones (Virginia Tech)**

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A proposal could originate outside the NRO EC, but then perhaps have a way to present/recommend to the NRO EC?

**Ron da Silva (Network Technologies Globl)**

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"a majority vote" of whom? The NRO EC? What if the NRO EC can't achieve quorum? ICANN must consult with the regional communities, not just "each RIR."

**Lee Howard (IPv4.Global by Hilco Streambank)**

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It may be worth adding a method for LIRs directly to enter a proposal as well.

**Xavier Clark (Harris Computer)**

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Derecognition could be a significant and adversarial event. I wonder if more than a majority vote should be considered.

**Andrew Gallo (The George Washington University)**

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### **1.3. Authority - Neutral (3)**

In agreement

**Mandisa Gama (IANET (PTY) LTD)**

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Where an RIR has failed like in the recent case of AfriNIC action should be possible to re-establish the RIR.

**Jaco Kroon (Interexcel World Connection)**

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Sentence Portion , "provided that ICANN has first consulted" , Might be nice to see a MUST or SHOULD placed in there to be suer of the clause .

**James Laferriere (n/a)**

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I agree

**Emmanuel Kitcher (University of Environment and Sustainable Development)**

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There will always be both sides to consider, and global politics will always be a problem. The issue here is IPv4 scarcity more than the RIRs themselves or extra RIRs. If the candidate where to NOT have IPv4 resources (other than what could/might be surrender to them by RIR members) I believe these issues would be lesser of problems. Ie. candidate RIRs to ONLY issue ASNs and IPv6 resources

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

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I don't think we need any more regions - just fix AfriNIC

**Mark Elkins (Posix Systems)**

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Not bad

**Hann Jye Ng (MyTeksi Sdn Bhd)**

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This principle seems to strike an effective balance between centralized oversight and regional autonomy. By requiring ICANN to consult with each RIR and consider their input

**Andres Murcia (Xiaomi)**

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How to ensure community participation?

**Lia Solis (personal)**

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this principle is confusing and carry risks of conflict.

**Adeola Alain P. AINA (Digital Intelligence Services, Sarl)**

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If ICANN decides, why can't they originate?, and I would prefer a supermajority vote if possible in the NRO EC

**Mike Burns (IPTrading)**

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The NRO is effectively a trade association of RIRs who have inherent interest in maintaining the status quo. They should not have a monopoly on proposing new RIRs or winding up existing RIRs.

**Kevin Meynell (Individual)**

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#### **1.4. Authority - Somewhat Disagree (2)**

On the Principles Level it is unclear how "ICANN" would come to its conclusion and whether it should judge on substance or on process

**Peter Koch (Individual)**

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The difficulty I see with this proposal is that it is quite clearly privileging the \_existing\_ RIRs (or more exactly, their EC members, who represent the institutional interests of the RIRs at least as much as the community) over anyone else. I'm not sure I have a better answer, but it worries me to be making the EDs/CEOs of the existing members of any body the gatekeepers to new members.

**Andrew Sullivan (N/A)**

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See extended comments on the NANOG thread starting at <https://mailman.nanog.org/pipermail/nanog/2024-November/226586.html>

**William Herrin (Self)**

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This means too much power to ICANN. NRO EC should have the final decision, but their seats should be paid then.

**Tahar Schaa (Neuland@Homeland)**

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candidates nominations could be affected by lobbies

**Filipe Coelho (TVCABO Angola)**

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La démarche visant la reconnaissance d'un RIR doit être différente de celle de la déreconnaissance. La proposition de la reconnaissance doit premièrement l'expression d'une zone géographique bien définie et aussi une expression des communautés vivants dans cet espace géographique. Par contre la démarche pour déreconnaître doit tenir compte de la volonté des communautés nationales ne doit souffrir d'une implication d'un poids extérieur aux communautés de l'espace géographique concerné.

**Nico Tshintu bakajika (ISPA-DRC)**

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I am inclined toward the NRO being the final approval

**Randy Bush (IIJ Research Lab & Arrcus Inc)**

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If ICANN has the last word to decide, why to consult. How the transparency will be preserved?

**Luis Caceres (Corporacion Redexcom C.A.)**

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## 1.5. Authority - Strongly Disagree (1)

First, this is not a proposal for a principle, it is a proposal for a particular implementation of a presumed but unwritten principle that can be inferred to be something along the lines of “Proposals for recognition of a Candidate must be vetted to meet [ICP-2? Community?] requirements”. However, to address what has been written and using the terminology of RFC 2119, the NRO Executive Council MUST NOT have a role that gates proposal for the recognition of a new RIR or the de-recognition of an existing RIR. Beyond providing a mechanism to enforce an oligopoly thereby creating a risk for anti-competitive behavior, the proposed principle as written would create a structural conflict of interest, both of which would contribute to the de-legitimization of the RIR system. With regards to the latter, since all RIR income depends on its membership and the combined membership of the RIRs is the universe of all resource holders, establishing a new RIR or terminating an existing RIR is a zero-sum game. This means this principle would impact the existing RIRs income and thereby threaten the creation of (at least the perception of) perverse incentives: either discouraging the establishment of a new RIR serving a particular community because it'll reduce the income of the existing RIR(s) or encouraging the de-recognition of an existing RIR causing the (fixed) income to then be split among fewer members. More concretely, the RIR system, as defined in RFC 1174/1366/1466/2050/7020 presupposed authority for delegation of registry responsibility in the “centralized IANA and I[n]ternet R[egistry]” (RFC 1174), “root registry” (RFC 1366/1466), “Internet Registry hierarchy” (RFC 2050), and “Internet Registry (IR) hierarchy” (RFC 7020). Nowhere in that history nor in the operation of the RIR system since its inception was there ever a suggestion that the (unelected) members of the NRO EC should have the self-appointed authority to determine who can propose the creation or termination of a new RIR. Instead, as foreseen in section 5 of RFC 7020, the process by which a community can propose a new RIR should “take place within the ICANN framework and will respect ICANN's core values”, e.g., bottom-up, open, transparent, and accountable processes. Having the CEOs of the existing RIRs gate proposals for the creation of a new or termination of an existing RIR does not appear to be within the ICANN framework or respect ICANN's core values.

**David Conrad (Layer 9 Technologies)**

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I have significant concerns with the principle outlined above, particularly regarding the provision that grants ICANN the ultimate authority to recognize or derecognize an RIR, even in cases where the NRO EC has reached a majority decision. This structure undermines the foundational principle of decentralization that underpins the Internet governance model. RIRs were established as independent entities to address the unique needs and circumstances of their respective regions. Allowing ICANN to have final authority in these decisions risks centralizing power in a way that could compromise the autonomy of the RIRs and hinder their ability to effectively respond to regional demands. - The process should prioritize a consensus-driven approach, ensuring that decisions of such magnitude are informed by the needs and preferences of the communities directly impacted. This would better align with the collaborative ethos of the RIR system, rather than subjecting these critical decisions to unilateral oversight by ICANN. - Furthermore, this proposal could weaken the accountability and transparency of RIRs within their regions. By centralizing authority, it risks creating governance structures less responsive to local needs and concerns, undermining the trust and effectiveness of the RIRs.

**Funmilayo ADEWUNMI (First Bright Technologies)**

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Representatives of the RIRs should have absolutely no power to affect outcomes that potentially affect their or any other RIR. Such decisions should be made by an independent group of representatives from Internet Providers with no affiliation to the RIR(s) potentially effected.

**j heasley (SNI)**

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The wording is circular and suggests that the NRO EC alone can create and approve a proposal to recognise/derecognise an RIR. If my interpretation is correct then it doesn't represent bottom-up governance as it lacks the ability for the global community to instigate the creation of a proposal.

**Terry Manderson (terrym.net Pty Ltd)**

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NRO & ICANN have full power to block proposals this way.

**Sergey Kozhedub (IPTP Networks)**

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ICANN with final authority to recognise and derecognise a candidate RIR negates the 'supposed' independence of RIR

**Ubong Udofia (Skystar)**

---

I think the status quo should remain let afrinic be as it is

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

Not acceptable RIR should be able to take decision by themselves as they are an entity

**Rasheed Shittu (STL FIBERCO LIMITED)**

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Je suis en profond désaccord avec le principe exposé ci-dessus, en particulier avec la disposition qui accorde à l'ICANN l'autorité finale sur la reconnaissance ou la déconsidération d'un RIR, en dépit du vote majoritaire du CE du NRO. Cette structure sape le principe fondamental de décentralisation qui est au cœur du modèle de gouvernance de l'Internet. Les RIR ont été créés pour fonctionner de manière indépendante et prendre des décisions qui reflètent les besoins et les circonstances uniques de leurs régions respectives. Accorder à l'ICANN l'autorité finale sur ces décisions risque de centraliser le pouvoir d'une manière qui pourrait outrepasser l'autonomie des RIR et limiter leur capacité à répondre efficacement aux demandes régionales.

**HERVE EGNAKOU (HOLOGRAM IDENTIFICATION SERVICES S.A.R.L)**

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It seems more logical if the proposal to recognize a new RIR should originate from a candidate RIR, not the NRO NC. The NRO NC can review and vote before submitting to ICANN, but the way "Authority" is formulated creates a situation when the status quo is impossible to break. Perhaps a better approach is that the NRO NC reviews the proposal and passes it to ICANN along with the recommendation that must receive a motivated response.

**Andrei Robachevsky (independent)**

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The NRO EC is incredibly poorly equipped to determine proposals for de-registration or even registration of RIRs. The pathetic correspondence signed by the NRO and addressed to the Mauritius government in the face of malfeasance by the Afrinic board (as then constituted) has undermined any credibility for the NRO EC to be entrusted with anything more than being a local dog catcher until there is a clear review and reform of the NRO EC. Moreover the true basis upon which ICANN should consider candidates involves proper stakeholder engagement and clear compliance checks. Both should be satisfied. A large part of the "original sin" with Afrinic was that purported community support was used to justify not entrenching proper governance mechanisms. Political considerations were allowed to override good practice.

**Paul Hjul (Crystal Web)**

---

I agree that without consideration with RIRs nothing can be implemented. But, if the most of members voted for it must be implemented sooner or later. For example ICANN can determine time of the implementation.

**Kate Petras (DCXV)**

---

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.

**Carlos Friaças (FCT\FCCN)**

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## 2. Amendment

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

### 2.1. Amendment - Strongly Agree (5)

If an RIR becomes unavailable as a result of any issue, then the GAC members under the RIR should be substituted to represent the RIR.

**Babagana Digima (Nigerian Communications Commission)**

---

ICP-2 affects RIRs and therefore they should have a say in their policy

**Brian Longwe (Converged Technology Networks)**

---

A clear procedure should be established for cases where a single RIR objects and all other RIRs agree with an amendment proposal.

**Cameron Smith (Bubble Cloud Mozambique S.A.)**

---

By RIRs I am assuming that this is in consultation with their respective membership and RIR community. At this time I agree the third party can be ICANN but that is only because I do not see another suitable option at this time. However, if there was a more suitable option identified, this could be considered.

**Paul Rendek (DSTREAM GROUP)**

---

ICP-2 should : (1) improve effective legal contract with all the IP addresses receivers for all the RIRs(had better to be consistent among all RIRs) (2) Improve the effective contract with all the RIRs EC or board regarding to conflict of interest (the person with RIR and its community) (3) all the RIR policy raised, has to have effective legal advice to prevent loopholes. Policy can't be just technical. Has to be third party legal notification to present wrong doing.

**Kuo Wu (TWIGF)**

---

Yes the responsibilities on internet are share

**Fabrice TEUGUIA (PCP-ACEFA)**

---

This is the best way to go

**Emmanuel Kitcher (University of Environment and Sustainable Development)**

---

It's good for the two bodies to work hand in hand

**Rita Kumi (Ghana Telecommunication Company)**

---

Every entity must be recognised

**Emmanuel Egbe (Nigeria)**

---

Again, ICANN should be deferential to RIRs to the extent there is consensus amongst the RIRs.

**Jeff Neuman (JJN Solutions, LLC)**

---

This invites consensus.

**Luis Caceres (Corporacion Redexcom C.A.)**

---

We are evolving in a dynamic environment, and it is just common sense to make sure the ICP-2 is a living document.

**Musa Stephen HONLUE (AFRINIC)**

---

there needs to be an amendment process, but it can't be blocked by an RIR - the word "all" could be an issue.

**Saul Stein (eNetworks)**

---

It should be unanimous.

**Brian Jones (Virginia Tech)**

---

If the RIRs are unanimous it's okay

**Mike Burns (IPTrading)**

---

I don't think Internet Coordination Policy document has not been defined as a series of authoritative policies. Therefore there will be needed very clear provision of powers of the respective stakeholders to handle with (amend or even remove) it.

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

Not sure if ICANN agreement is needed. Also what happens if an RIR is misbehaving and doesn't support the amendments ...

**Jordi Palet Martinez (The IPv6 Company)**

---

## **2.2. Amendment - Somewhat Agree (4)**

Should involve consultation with all members, if that isn't covered by the phrase "all RIRs"

**Darrell Budic (OHG Networks, LLC)**

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A small risk re unanimity, esp if an RIR is in a situation like AFRINIC - is non-participation counted as a no, or is it OK?

**Jordan Carter (auDA)**

---

I agree that IPC-2 can be amended with the approval of ICANN and the RIRs because being disjointed it is still based on the existing model

**Thierry Nagau (Dauphin Telecom)**

---

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

**Narelle Clark (Internet Association of Australia)**

---

Happy with this, but should it not be other RIRs. The RIR in question should be excused from voting.

**Warwick Ward-Cox (Network Platforms)**

---

It also ensures that the interests of all stakeholders are considered and protected.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

it must involve as many as RIRs possible to ensure impartial decision

**Filipe Coelho (TVCABO Angola)**

---

Agreed. RIR and ICANN at the AGM

**Russell Woruba (PNG Department of ICT)**

---

respects the autonomy and insights of each RIR, ensuring any changes reflect the collective will of all stakeholders involved. However, it may be helpful to have a structured mechanism for negotiating

**Andres Murcia (Xiaomi)**

---

unanimity also has drawbacks, cfr. EU

**Joerg Dorchain (private)**

---

There must be clarity of interpretation in the modifications.

**Lia Solis (personal)**

---

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?

**Ron da Silva (Network Technologies Global)**

---

Sounds right, but a distressed RIR may be unable to contribute. How is agreement determined--a statement from the CEO, a vote of the members, a show of support from the communities? I suggest it follow the Global Policy process.

Lee Howard (IPv4.Global by Hilco Streambank)

---

Amendments may be necessary to handle future situations, but should be rare and require strong agreement by all parties.

Richard Greenwood (Shasta County Office of Education)

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### 2.3. Amendment - Neutral (3)

This gives every RIR and ICANN a veto. This is obviously good for stability when everything is working well, but if one of these bodies is seriously "off the rails" and the others want to impose some kind of new consensus, there appears to be no way to do so under this principle.

Andrew Sullivan (N/A)

---

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

Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))

---

While agreement between ICANN and the RIRs is a necessary condition for ICP-2 amendment it is not sufficient. The IETF must have a veto right and there must be broad consensus for amendment at both the global IGF and amongst members of the respective RIRs

Paul Hjul (Crystal Web)

---

What are the meaning of ICANN and RIRs here ? these entities have many decision making bodies

Adeola Alain P. AINA (Digital Intelligence Services, Sarl)

---

A majority vote of the existing RIRs should suffice. Any RIR that would have a conflict of interest should refrain.

Elvis Velea (V4Escrow LLC)

---

I am not quite aware and have a strong opinion on this one

Kate Petras (DCXV)

---

ARIN, RIPE, and APNIC are the only three that should need to agree.

Joseph Moran (Fiserv)

---

ICP-2 should be amendable through the wider ICANN multi-stakeholder process in certain circumstances.

Kevin Meynell (Individual)

---

## 2.4. Amendment - Somewhat Disagree (2)

Totally disagreed. Requiring unanimous agreement makes updates impractical and gives ICANN too much power.

**Noel OUPOH (DATACONNECT AFRICA)**

---

Agreement of all RIRs is enough and more democratic

**Tahar Schaa (Neuland@Homeland)**

---

Input from the Member entities SHOULD/MUST(?) be actively sought before such Amending .

**James Laferriere (n/a)**

---

While ICP-2 (Internet Coordination Policy 2) can be amended upon agreement between ICANN and all RIRs, it would likely benefit from incorporating input from other stakeholders or a public comment period. Here are some reasons why broader stakeholder involvement is advantageous: **Inclusivity and Transparency:** The internet's infrastructure affects a wide range of stakeholders beyond ICANN and RIRs, including internet service providers, technical communities, governments, and end-users. Allowing other stakeholders to provide input or public comments ensures a transparent process where all impacted parties can voice their concerns or support, fostering trust in the decision-making process. **Broader Perspective and Expertise:** The global nature of the internet means that technical, regulatory, and economic considerations from various regions should be considered. Opening up the amendment process to more stakeholders can introduce diverse perspectives and expertise, helping ensure the policy is comprehensive and robust. **Consensus-Based Governance:** ICANN follows a multi-stakeholder model, which has proven effective for addressing complex internet governance issues. Engaging additional stakeholders or opening a public comment period aligns with this model, reinforcing ICANN's commitment to inclusive and consensus-based decision-making. **Mitigating Unintended Consequences:** Amendments to ICP-2 could have far-reaching implications, including unforeseen impacts on internet operations, governance, and stability. Broader input allows potential issues to be identified early, reducing the risk of unintended consequences that may arise if the policy were only reviewed by ICANN and the RIRs. **Accountability to the Internet Community:** Given that ICP-2 plays a role in the foundational governance of IP address allocation and related matters, amendments affect all who rely on a stable, open internet. Inviting public comment shows accountability to the entire internet community, not just ICANN and the RIRs. **Global Policy Implications:** ICP-2 amendments could influence policies worldwide. By including public input, especially from governments, civil society, and businesses, any amendments to ICP-2 would better reflect the diverse interests affected by IP address policies globally.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

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I suggest the majority of the RIRs

**Marco Marzetti (Consolle Connect)**

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## 2.5. Amendment - Strongly Disagree (1)

It is unclear how ICANN would come to its conclusion and whether it would judge on substance or on process

**Peter Koch (Individual)**

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Again, this is not a proposed principle, but rather a proposal for a particular implementation of a presumed principle, with that unwritten principle being something like "ICP-2 must be amendable by agreement of". To address what was written directly, the "agreement of ICANN and all RIRs" implies any single RIR or ICANN (presumably ICANN's Board, although it may be referring to the ICANN empowered community) would have an effective veto on any amendment of ICP-2. This would risk making it very difficult if not impossible to modify ICP-2 in order to adapt to the changing Internet. Given the proposed principles of auditability and service conformance, it must be assumed that ICP-2 modifications will be far more likely than has been the case to date. As an implementation suggestion, instead of using unanimity, use a super majority of 2/3rds of the voting parties, i.e., ICANN (as represented by the ICANN Board of Directors, perhaps excluding the two RIR designated Board members to avoid the "multiple bites of the apple"/conflict of interest problem or perhaps using ICANN's Empowered Community) and all (currently five) of the RIRs, voting in the affirmative to decide whether a proposed amendment to ICP-2 should be accepted.

**David Conrad (Layer 9 Technologies)**

---

Amendments to the ICP-2 can **\*\*ONLY\*\*** be done by ICANN.

**Emma Perrier (AFRINIC Ltd)**

---

I disagree with this principle. Requiring ICP-2 amendments to be based on the agreement of ICANN and all RIRs could jeopardize the balance of power and compromise regional autonomy. Such a structure risks creating undue pressure on RIRs to conform to broader agreements, potentially at the expense of addressing their unique regional needs. RIRs should retain the flexibility to operate independently and prioritize their local communities without being bound by a rigid, universal agreement framework.

**Funmilayo ADEWUNMI (First Bright Technologies)**

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The RIRs should not be in control of the ICP-2 in any manner. The RIRs can not be trusted to act for the benefit of the public.

**j heasley (SNI)**

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Autonomy of RIRs should not be circumvented

**Ubong Udofia (Skystar)**

---

No comment

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

RIRs should be able to do things in line with their needs and wants

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

Je ne suis pas du tout d'accord avec cette disposition. Imposer un délai de grâce fixe aux RIR pour aligner leurs politiques sur le PCI-2 risque de porter atteinte à l'autonomie et à la flexibilité régionales. Les RIR devraient avoir la possibilité de s'adapter à leur propre rythme, en tenant compte de leur situation particulière, plutôt que d'être contraints de se mettre en conformité dans des délais arbitraires. Cette approche pourrait entraîner des pressions inutiles et une perturbation potentielle des processus de gouvernance locale.

**HERVE EGNAKOU (HOLOGRAM IDENTIFICATION SERVICES S.A.R.L)**

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Question 6&7 AmendmentI Question 6-7 # CP-2 may be amended upon the agreement of ICANN and all RIRs. 1- Strongly Disagree Answer I completely disagree with this requirement. Mandating that all parties—ICANN and every RIR—must agree could hinder necessary updates to ICP-2, even if there is broad support. This setup allows ICANN to effectively block changes, slowing down crucial improvements.

**Anjan Deka (HDFC)**

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IMO, the ICP-2 updates should follow the global policy development process.

**Andrei Robachevsky (independent)**

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ALL will never work.

**Andrew Cohen (Farelanes LLC)**

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### 3. Rectification

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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.

#### 3.1. Rectification - Strongly Agree (5)

The grace period shall not be less than 4 months.

**Babagana Digima (Nigerian Communications Commission)**

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Harmonization of policies between RIRs will not only contribute towards a healthy Internet but also ensure best practices

**Brian Longwe (Converged Technology Networks)**

---

Fair policy

**Tahar Schaa (Neuland@Homeland)**

---

To be consistent as possible among RIRs, and improve legal advice between IP addresses receivers. All RIRs EC or Board member has to sign effective conflict of interest with RIRs and its communities.

**Kuo Wu (TWIGF)**

---

The rules should be the same for everyone

**Fabrice TEUGUIA (PCP-ACEFA)**

---

Prescribing a grace period for compliance is fair, but I suggest we consider explicitly stating a collaborative approach to help RIRs during this period.

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

---

It's the right thing to do

**Emmanuel Kitcher (University of Environment and Sustainable Development)**

---

rien comme commentaire

**Nico Tshintu bakajika (ISPA-DRC)**

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It's good to be given fair hearing

**Rita Kumi (Ghana Telecommunication Company)**

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What if due to certain factors the RIR cannot function, hence they are not in a position to comply. Example is how at the moment AFRINIC doesn't have a board and CEO. In this case they are not able to do a lot of things.

**Raymond Mamattah (EGIGFA)**

---

c'est realiste

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

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Maybe a time should be specified

**Randy Bush (IIJ Research Lab & Arrcus Inc)**

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This is the usual.

**Luis Caceres (Corporacion Redexcom C.A.)**

---

I fully agree and a maximum of 6 months should be given to the RIR.

**Musa Stephen HONLUE (AFRINIC)**

---

The grace period sounds reasonable. RIRs distribute the same time of resources, so the differences within their rulesets is not really something beneficial, moreover in a globalized world.

**Carlos Friaças (FCT\| FCCN)**

---

If the conflict is with an RIR's bylaws, which can involve an extend process and significant legal review to amend should allow for a minimum of 1 year .

**David Farmer (University of Minnesota)**

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Good attention to the case the amendment brings such conflicts.

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

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As the RIR already has agreed to the amendment (otherwise I can't be accepted) I don't foresee any problems here

**Sander Steffann (SJM Steffann Consultancy)**

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### **3.2. Rectification - Somewhat Agree (4)**

It seems a reasonable principle, but the devil will obviously be in working out the enforcement mechanism.

**Andrew Sullivan (N/A)**

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Practical and sensible as long as the period isn't overly long.

**Jordan Carter (auDA)**

---

"Reasonable" time should be specified.

**Colwayne Babb (Cable and Wireless)**

---

Yes, because it will take time to adapt because we must not forget the primary meaning of the project.

**Thierry Nagau (Dauphin Telecom)**

---

While I agree with this principle, there is a level of process assumed to be the case in determining that a principle should be adopted that may be in conflict with one or more RIR policies. Not the least of which being the identification of such potential conflicts.

**Narelle Clark (Internet Association of Australia)**

---

it allows RIRs sufficient time to make necessary adjustments without immediate repercussions. This approach promotes flexibility and ensures a smooth transition to any new requirements imposed by ICP-2 amendments.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

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The word "reasonable" is a difficult one as it is rather subjective. I think it would be useful if this grace period was enshrined as something negotiated/agreed between the RIR and ICANN.

**Brian Nisbet (HEAnet CLG)**

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Exclude IPv4, and I don't believe the bylaws would be a "thing"... include IPv4, and it's a money/greed game

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

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I'm not aware of any conflicts

**Mark Elkins (Posix Systems)**

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Rather than setting a fixed grace period for all amendments, allow for variable grace periods based on the complexity and impact of the changes required. For example, minor adjustments might have a shorter grace period, while more complex adjustments would allow additional time for compliance, enabling RIRs to align at a manageable pace. Permit each RIR to create a customized compliance plan, detailing the steps they'll take to align their policies and practices with the amended ICP-2 within the given grace period. This would allow RIRs to address conflicts in a way that minimizes disruption to their operations and member services. Offer transitional support, such as advisory resources or periodic check-ins from ICANN, to assist RIRs in making necessary adjustments. This could include workshops, technical support, or access to policy experts who can provide guidance on aligning practices efficiently with ICP-2. Before proposing an amendment, conduct a thorough impact assessment with each RIR to understand potential areas of conflict and estimate the resources and

time needed for compliance. These assessments could guide the amendment drafting process and ensure that amendments are practical and achievable within reasonable timelines. If full compliance within the grace period is not feasible for an RIR, consider allowing “progress-based” compliance metrics, where incremental steps or milestones are acknowledged as compliance efforts. This would recognize the complexity of some adjustments while ensuring that RIRs work continuously toward full conformity. Once an amendment takes effect, introduce a review mechanism to assess its impact on RIRs periodically. This would help ICANN and RIRs make timely adjustments to the amendment itself if unforeseen issues arise, preventing unnecessary penalization or disruption for the RIRs involved. Include a mechanism for conflict resolution where RIRs can raise specific concerns about implementation challenges during the grace period. This mechanism could offer a formal avenue for RIRs to request additional support or adjustments to the timeline if justified, fostering collaboration and mitigating any adverse impacts on RIR operations.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

Agreed. However, sufficient time and audience must be afforded the RIR for context in implementation of an (existing) policy.

**Russell Woruba (PNG Department of ICT)**

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Grace time must be provided

**John Haydon (Education)**

---

Enough room and consideration should be giving before a decision should be made

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

The grace period offers flexibility and minimizes potential disruption to RIR operations. It may be beneficial.

**Andres Murcia (Xiaomi)**

---

Based on the previous principle, an RIR will already have supported the amendment, which they wouldn't do if they couldn't change their policy/practice/bylaw.

**Lee Howard (IPv4.Global by Hilco Streambank)**

---

I agree with this. In case of any conflict it should be considered non-complaint. Moreover I believe any amendment should be consulted with law department in advance.

**Kate Petras (DCXV)**

---

Reasonable approach

**Andrew Cohen (Farelanes LLC)**

---

Any conflicts should be found before the amendment is ratified and any remediation should be part of the amendment.

**Richard Greenwood (Shasta County Office of Education)**

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### 3.3. Rectification - Neutral (3)

"Reasonable" should have a time limit in the document. Less than 1 year.

**j heasley (SNI)**

---

Acceptable

**Hann Jye Ng (MyTeksi Sdn Bhd)**

---

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

**David Lamparter (Westnetz w.V.)**

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I agree

**Erika del carmen Garay Obando (IBW)**

---

I'm trying to think of a situation where this would come into play. I'm concerned if there was a conflict which required an RIR to change a policy, there might be downstream impacts (meaning, with customers). I'm generally in favor of the idea.

**Andrew Gallo (The George Washington University)**

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Both ICP-1 and ICP-2 are quite simple documents and it's difficult to see where there might be conflicts. RIR disfunction is a bigger issue that has failed to be addressed anyway.

**Kevin Meynell (Individual)**

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The devil is in the details concerning grace period. It needs to be defined and a mechanism in place to assess and arbitrate in the case of exceptional circumstances

**Matthew Cowen (dgtifutures)**

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### 3.4. Rectification - Somewhat Disagree (2)

A running RIR should ensure that it's policies and practices are ALWAYS up to date. Frequent audits (every quarter) are mandatory.

**Emma Perrier (AFRINIC Ltd)**

---

Since the RIR's are VOTING Members , Why would a RIR vote to make itself non-compliant ?

**James Laferriere (n/a)**

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“...RIR may be considered non-compliant.” Seems to be very specific. It should probably read “If an amendment to ICP-2 makes an RIR non-compliant, the amendment shall prescribe a reasonable but specific grace period...”

**Andrei Robachevsky (independent)**

---

Grandfather clauses must protect existing members of RIRs. RIRs are not entities unto their own with legitimate commercial interests outside of performing the RIR function on behalf of their members and in accordance with global Internet norms. Amendments to ICP-2 are to bring the RIRs into line with global Internet norms. RIRs should immediately be considered non-compliant if they are but derecognition should only commence after a grace period.

**Paul Hjul (Crystal Web)**

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This clause seems to require a grace period to be specified only if there is known to be a conflict; however in case there is a conflict which is not identified at the time of writing the amendment, it is still important that a grace period be available. Regardless of any grace period specified by an amendment, there should be a default grace period for any and all amendments. There should also be consideration of emergency situations (existential threats etc) in which an RIR may be required to take more urgent action.

**PAUL WILSON (private individual)**

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The policy is made by the community. The "grace period" should consider the period of community discussion in physical or virtual meetings.

**YingChu Chen (Taiwan Institute of Economic Research)**

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### **3.5. Rectification - Strongly Disagree (1)**

The principle makes little sense given that the RIR (the org or its policy making body?) would have to agree to the "amendmend" in the first place. The RIR could agree to have an amendmend override its own policies and thereby conflict with the priveleges of its policy settiung body.

**Peter Koch (Individual)**

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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 questions then becomes what is “reasonable” and “who decides what is reasonable and/or compliant”.

**David Conrad (Layer 9 Technologies)**

---

The deadlines set should take into account the needs of local governance

**Noel OUPOH (DATACONNECT AFRICA)**

---

I strongly oppose this provision. Requiring RIRs to comply with ICP-2 within a fixed grace period risks compromising their regional autonomy and flexibility. RIRs should have the freedom to adapt their policies at a pace that aligns with their unique circumstances, rather than adhering to rigid timelines. Such an approach could impose unnecessary pressure and disrupt local governance processes.

**Funmilayo ADEWUNMI (First Bright Technologies)**

---

The bylaws are ok for now

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

Je ne suis pas du tout d'accord avec cette disposition. Imposer un délai de grâce fixe aux RIR pour aligner leurs politiques sur le PCI-2 risque de porter atteinte à l'autonomie et à la flexibilité régionales. Les RIR devraient avoir la possibilité de s'adapter à leur propre rythme, en tenant compte de leur situation particulière, plutôt que d'être contraints de se mettre en conformité dans des délais arbitraires. Cette approche pourrait entraîner des pressions inutiles et une perturbation potentielle des processus de gouvernance locale.

**HERVE EGNAKOU (HOLOGRAM IDENTIFICATION SERVICES S.A.R.L)**

---

Question 8&9 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. 1- Strongly Disagree Answer I completely disagree with this provision. Setting a fixed grace period for RIRs to align their policies with ICP-2 could undermine regional autonomy and flexibility. RIRs should be allowed to adapt at their own pace, considering their specific contexts, rather than being forced into compliance within arbitrary deadlines. This could create undue pressure and disrupt local governance processes.

**Anjan Deka (HDFC)**

---

Vague language and I would at least consider grandfathering in conflicting policies if possible

**Mike Burns (IPTrading)**

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## 4. Coverage

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

### 4.1. Coverage - Strongly Agree (5)

Hard to argue against this as it would imply some areas of the globe would not have access to RIR services.

**David Conrad (Layer 9 Technologies)**

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We should replace the word jointly (which implies 2 RIRs) with collectively (which may mean more than 2).

**Babagana Digima (Nigerian Communications Commission)**

---

Absolutely vital.

**Jordan Carter (auDA)**

---

This seems like a fair mandate

**Colwayne Babb (Cable and Wireless)**

---

I think the Caribbean should have its own RIR because they are the good students in terms of respect for internet use and the place where there are the fewest DDOS type attacks.

**Thierry Nagau (Dauphin Telecom)**

---

Yes i agree. We're in this togehter.

**Emma Perrier (AFRINIC Ltd)**

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I fully support the principle that "All RIRs shall jointly ensure that all areas on the globe continually receive RIR services." This collaborative approach is essential for several reasons: **Ensuring Comprehensive Coverage:** By working together, RIRs can guarantee that every region, regardless of its size or specific needs, receives consistent and reliable services. This joint effort helps prevent any geographical gaps in resource distribution and management. **Leveraging Collective Expertise:** Collaboration among RIRs allows for the sharing of best practices, knowledge, and technical expertise. This collective intelligence enhances the overall effectiveness and efficiency of RIR operations globally. **Maintaining Regional Autonomy:** While RIRs work together to ensure global coverage, each RIR can continue to maintain its autonomy and address the unique requirements of its respective region. This balance ensures that regional specificities are respected while achieving a unified global standard. **Enhancing Resilience and Stability:** Joint efforts contribute to a more resilient and stable Internet governance framework. By supporting each other, RIRs can better handle challenges, adapt to changes, and ensure uninterrupted services worldwide. **Promoting Equity and Inclusion:** A united approach ensures that all regions, including those that are less developed or have limited resources, receive the necessary support and services. This promotes a more equitable distribution of Internet

resources and fosters inclusive growth. In summary, the collective responsibility of all RIRs to ensure global service continuity aligns with the core principles of decentralization and regional autonomy. It fosters a cooperative environment where each RIR can thrive while contributing to the overarching goal of a well-governed and universally accessible Internet.

**Funmilayo ADEWUNMI (First Bright Technologies)**

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RIR services are essential to the continuous operation of the internet and therefore vital to ensuring trust and ongoing reliability.

**Narelle Clark (Internet Association of Australia)**

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principle underscores the collective responsibility of all RIRs to ensure global internet connectivity. It emphasizes the importance of collaboration and coordination among RIRs to address the evolving needs of the internet community worldwide. By working together, RIRs can guarantee that internet number resources are available and accessible to all regions, promoting inclusivity and equitable growth of the internet.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

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With effective improvements to fulfill its function and as consistent as possible among RIRs. And add legal statements

**Kuo Wu (TWIGF)**

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Protection of internet services

**Fabrice TEUGUIA (PCP-ACEFA)**

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This ensures compliance by all involved

**Emmanuel Kitcher (University of Environment and Sustainable Development)**

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We need the services of RIRs

**Mark Elkins (Posix Systems)**

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Coordinating RIR service coverage efforts through the NRO could be highly effective. The NRO, as the coordinating body of all RIRs, is well-positioned to streamline global service provision and address any coverage gaps. Here's why NRO coordination would be beneficial and how it could work effectively: The NRO can facilitate the creation of a unified, global strategy to identify underserved regions or areas with growing needs. By pooling resources, the RIRs can work together more efficiently to deploy services where needed, avoid duplication, and ensure that all regions receive consistent support. The NRO can act as a central point of communication for coordination between RIRs, which is particularly useful for tackling cross-regional challenges. For example, when new regions demand IP address allocations or technical assistance, the NRO could oversee these requests and assign the appropriate RIR(s) to provide support. Policies that affect global resource management could be implemented consistently across regions through NRO oversight. This would help standardize approaches to new challenges, such as IPv6 adoption or emerging security issues, ensuring uniform standards in all regions. By coordinating through the NRO, RIRs can better address specific regional needs, such as



capacity building or technical support in underserved areas. Additionally, in emergencies or urgent situations, the NRO can organize rapid response teams from multiple RIRs to provide immediate assistance to impacted areas, whether that's technical support, resource allocation, or training. The NRO can act as a knowledge-sharing hub, allowing RIRs to share best practices and lessons learned from their respective regions. This collaborative approach could enhance service quality and enable RIRs to adopt effective solutions quickly in response to global challenges. Centralized coordination through the NRO allows for consistent reporting and monitoring of service coverage, providing the global community with transparent updates on how well each area is being served. This transparency can boost trust in RIRs and the internet governance structure as a whole. The NRO could conduct regular assessments to map out service coverage globally and identify areas where additional support or resources are needed. Based on these assessments, the NRO could work with specific RIRs to plan and implement necessary interventions. The NRO could organize joint training programs or outreach initiatives focused on areas that are underserved or facing new challenges. By involving experts from multiple RIRs, these initiatives would bring diverse knowledge and resources to each region. In cases where an RIR needs additional resources to serve a region, the NRO could facilitate the sharing of technical or human resources from other RIRs to address immediate needs, ensuring consistent service levels globally. Establishing working groups within the NRO with representatives from each RIR could enable consistent coordination on emerging issues, new services, or regional expansions. These working groups could also recommend policy adjustments to address common challenges. The NRO could oversee efforts to ensure consistency in service standards worldwide while allowing individual RIRs to tailor specific implementations to meet regional nuances. The involvement of the NRO in coordinating global service coverage efforts underscores a commitment to a well-governed and equitable internet infrastructure, strengthening trust in the RIR system and the broader internet governance model.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

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For continuity

**Rita Kumi (Ghana Telecommunication Company)**

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Perfect

**Raymond Mamattah (EGIGFA)**

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RIRs role is pivotal and should provide services to all its members.

**Russell Woruba (PNG Department of ICT)**

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It makes sense

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

juste

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

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

**Andres Murcia (Xiaomi)**

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There is one global Internet. RIRs should be regionalized to promote accessibility to members and not to promote fragmentation of the Internet.

**Paul Hjul (Crystal Web)**

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This is a global community effort and all should back each other up to keep registration services operational.

**Brian Jones (Virginia Tech)**

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How do we handle conflicts on the edges? For example: LIRs in the West Indies getting resources from RIPE instead of ARIN

**Xavier Clark (Harris Computer)**

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However, the RIR also needs to comply with government regulations and policies.

**YingChu Chen (Taiwan Institute of Economic Research)**

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I like it jointly ensured, so other RIRs can step in if there is any area not being served.

**Mike Burns (IPTrading)**

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Clearly, a reasonable and desirable principle.

**Andrew Gallo (The George Washington University)**

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Adjust wording to reflect the growing deployment of space-borne internet networks. The moon is close enough to share our Internet. But far enough away that one or more separate blocks of addresses might be administratively useful

**Leo Vegoda (And Polus LLC)**

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The existing structure multiple RIRs and exclusive regions should be reviewed with respect to whether this is the most efficient and cost effective approach.

**Kevin Meynell (Individual)**

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Simple but good condition which must meet as the Internet Number Resource Management scheme  
**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

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Very important

**Sander Steffann (SJM Steffann Consultancy)**

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Not mentioned here (and likely too specific) is the concern of sanctions. If an RIRs' home country sanctions another country under that RIRs scope, should it (temporarily or permanently) be moved to a non-sanctioning RIR?

## 4.2. Coverage - Somewhat Agree (4)

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.

**Andrew Sullivan (N/A)**

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Africa as a region is far behind but rapidly growing in terms of internet and therefore must be given preference especially in light of resource allocation

**Brian Longwe (Converged Technology Networks)**

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The Internet is expanding to space. The notion of "globe" should be updated in this context, including a possible SpaceIR or the ICP itself

**Marc Blanchet (Viagenie)**

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Entities should use the RIR for where resources will be primarily used, and it's OK to restrict resource utilization for out-of region such that a LIR/EU may need to belong to multiple RIR.

**Jaco Kroon (Interexcel World Connection)**

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The principle ensures global service but doesn't address how underserved or resource-constrained regions are supported. The principle for equitable resource allocation across regions may strengthen the inclusiveness of the ecosystem.

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

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Total coverage is vital

**John Haydon (Education)**

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this will depend on the service they intend to share

**Rasheed Shittu (STL FIBERCO LIMITED)**

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The principle of ensuring global RIR service coverage may require further guidance for cases where certain regions face exceptional circumstances. For example, in areas under sanctions, affected by conflicts, or where RIR services face limitations due to local policies, it might be challenging to maintain consistent service

**Anastasia Kleiman (Voldeta)**

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I only have some issues about areas of the globe where governments decide to invade other countries. Conflict areas are complex. But i mostly agree with the full coverage, even if part of it, at some point gets to be blocked.

**Carlos Friaças (FCT\| FCCN)**

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#### **4.3. Coverage - Neutral (3)**

There is room for improvement and clarity in this principle given that the responsibility would be shared while the non-overlap clause could prohibit action. The topic of shift of responsibilities for sub-regions needs to be explicitly addressed.

**Peter Koch (Individual)**

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Forcing all RIRs to ensure global coverage undermines regional autonomy and leads to inefficiencies. Each RIR should have the freedom to focus on its own community's needs rather than being obligated to meet global service expectations.

**Noel OUPOH (DATACONNECT AFRICA)**

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Again, IPv4 is the issue.... AfriNIC is (one of?) the "problem child" here as there had been fraud and other things happening with resources that have a high monetary value... if the resources don't have any real/intrinsic value (like IPv6 and 6-8digit ASNs) then I'd agree with just about all of this

**Hendrik Visage (HeVIS.Co Systems Pty Ltd)**

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Agree on this

**Hann Jye Ng (MyTeksi Sdn Bhd)**

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this definition must be put in context to avoid RIR overlapping service region

**Adeola Alain P. AINA (Digital Intelligence Services, Sarl)**

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#### **4.4. Coverage - Somewhat Disagree (2)**

#### **4.5. Coverage - Strongly Disagree (1)**

in practice it will be difficult because not all RIR have the same means to do it.

**alexis ndoumga (ministry of posts and telecommunications)**

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la priorité doit être accordée l'espace géographique pour permettre à la communauté d'assurer le suivi et l'évaluation de la gouvernance du RIR

**Nico Tshintu bakajika (ISPA-DRC)**

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La proposition risque également de réduire la responsabilité et la transparence des RIR dans leurs régions respectives, ce qui pourrait conduire à une gouvernance moins sensible aux besoins et aux préoccupations locales

**HERVE EGNAKOU (HOLOGRAM IDENTIFICATION SERVICES S.A.R.L)**

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Question 10&11 Coverage All RIRs shall jointly ensure that all areas on the globe continually receive RIR services. 1- Strongly Disagree Answer I completely disagree with this requirement. Mandating that all RIRs ensure global coverage undermines regional autonomy and could lead to inefficiencies. Each RIR should be free to prioritize the needs of its own community rather than being obligated to fulfill global service expectations.

**Anjan Deka (HDFC)**

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## 5. Service Region

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

### 5.1. Service Region - Strongly Agree (5)

Consistent with current approach to only have one RIR offering service in a given territory, to avoid confusion. This policy process not the time to consider market/system changes like allowing users anywhere, to inspire competition between RIRs.

**Jordan Carter (auDA)**

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The RIRs are geographically separated and this principle must be scrupulously respected

**Thierry Nagau (Dauphin Telecom)**

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Nothing to add or detract

**Brian Longwe (Converged Technology Networks)**

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It is vital that RIRs not compete with each other nor undermine the clarity in the applicable rules and effectiveness of overall services.

**Narelle Clark (Internet Association of Australia)**

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Provide effective channels among RIRs to prevent someone wrong doing to cross regions with legal punishment.

**Kuo Wu (TWIGF)**

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To increase law enforcement

**Fabrice TEUGUIA (PCP-ACEFA)**

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Principle is clear. No comment

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

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The principle that an RIR's region should cover a large multinational geographic area and not overlap with another RIR's region is crucial for maintaining efficient, equitable, and conflict-free management of IP address allocation and other internet resources. Here's why this principle is important: Ensuring that RIR regions don't overlap prevents duplication of IP address allocations, which could cause conflicts if multiple RIRs were allowed to assign the same resources within the same region. This separation avoids inconsistencies and conflicts in resource allocation and ensures clarity for both RIRs and the communities they serve. Non-overlapping regions establish clear boundaries of responsibility for each RIR, making it easier to manage and track internet resources. This accountability ensures that each RIR is solely responsible for IP address allocation, policy enforcement, and support within its

region, which improves governance and operational transparency. By covering large, distinct regions, each RIR can manage IP resources more efficiently. This approach allows RIRs to allocate addresses based on the specific needs of a given region, avoiding overlap that might complicate allocation strategies or result in resource shortages or surpluses in certain areas. Non-overlapping regions enable each RIR to develop and apply region-specific policies without interference. Since internet usage, infrastructure, and regulatory environments vary across regions, RIRs can tailor their policies to meet the unique demands and challenges of their geographic area. If regions overlapped, policy conflicts or inconsistencies could arise, undermining the effectiveness of region-specific policies. Network operators and end-users benefit from knowing exactly which RIR to contact for resources or support. Non-overlapping regions simplify this process, providing clarity to users about which RIR serves their needs and ensuring seamless support and guidance. Non-overlapping regions reduce the administrative overhead that would arise from coordinating resource management in shared areas. With defined territories, each RIR can operate independently, streamlining operations and avoiding the need for complex agreements or coordination between multiple RIRs over the same territory. RIRs play a key role in maintaining a stable internet by ensuring fair and orderly IP address allocation. By assigning each RIR a large, distinct region, this model reinforces global stability and consistency in resource management, which is essential for a stable and resilient internet infrastructure. The non-overlapping regional approach aligns with ICANN's multi-stakeholder model, where various organizations and regions work cooperatively without infringing on each other's jurisdictions. This clear separation of regions fosters international cooperation while respecting regional autonomy, making it easier for ICANN and the NRO to oversee a globally consistent IP address allocation system.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

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To avoid many RIRs

**Rita Kumi (Ghana Telecommunication Company)**

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IPs from one region should also not be used outside that region.

**Raymond Mamattah (EGIGFA)**

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Important to ro avoid disfunction

**Constanze Buerger (Government)**

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Not to mention future possibilities of new areas for RIRs such as Middle East, Resolution of the current Caribbean states overlapping between ARIN and LACNIC.

**Russell Woruba (PNG Department of ICT)**

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It makes sense

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

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Conflict of interest must be prevented

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

bonne idee

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

Les RIR ne doivent que gérer les membres de leurs regions

**HERVE EGNAKOU (HOLOGRAM IDENTIFICATION SERVICES S.A.R.L)**

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Defining regions to prevent overlap enhances operational efficiency and accountability within each RIR's designated area.

**Andres Murcia (Xiaomi)**

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It is already detrimental to the RIR system that its users can sometimes "shop around" for better RIR interactions. RIR services are a commons run by consensus for a larger good and shouldn't compete with each other.

**David Lamparter (Westnetz w.V.)**

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what is the minimum number of countries to be multinational? >1 ?

**Joerg Dorchain (private)**

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This keep it everything neat.

**Luis Caceres (Corporacion Redexcom C.A.)**

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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.

**PAUL WILSON (private individual)**

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This is in fact the current model. This however also doesn't enable competition between RIRs, which i think in the end it's a good path, because cooperation is largely better!

**Carlos Friaças (FCT\| FCCN)**

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Consider adding an acknowledgement that territories/economies should be able to change the RIR they use after political changes

**Leo Vegoda (And Polus LLC)**

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Except where a person/corporation/org operates across regions, then up to them on what space they register where and what registration appears for any given asset.

**Joseph Moran (Fiserv)**

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I remember there has been a discussion on the scale or a single RIR or number of RIRs. I think this expression suffices the need.

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

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Good balance between preventing small / single-country RIRs and not sticking to "continental" scale  
**Sander Steffann (SJM Steffann Consultancy)**

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Regions should not be so large that they become unmanageable or unresponsive nor should they be so small that a single nation has excessive influence.  
**Richard Greenwood (Shasta County Office of Education)**

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## **5.2. Service Region - Somewhat Agree (4)**

That would depends on practical reasoning, exception may needed sometimes, but such exceptions should be rare. The service region should be clearly defined in principle, so that the management of the global resources would work, and the policy of specific region can be followed and enforced.  
**Alban Kwan (CSC)**

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I agree with the principle that "The region for which an RIR is responsible shall cover a large multinational geographic area and shall not overlap with that of another RIR." This principle is vital for maintaining clarity, efficiency, and equity in the management of Internet resources. - Avoiding Duplication and Confusion: By ensuring that RIRs have distinct, non-overlapping regions, this principle minimizes the risk of duplication, conflicts, or confusion in resource allocation and governance. - Promoting Efficient Resource Management: Clear regional boundaries enable RIRs to focus on the specific needs of their designated areas, ensuring more targeted and effective service delivery. - Strengthening Regional Representation: A single RIR per region fosters a strong sense of regional representation and accountability, allowing communities within that area to have a unified voice in Internet governance discussions. - Respecting Regional Autonomy: This structure ensures that RIRs can operate independently while addressing the unique demands of their respective regions, without interference or overlap from other RIRs. - Facilitating Collaboration Between RIRs: Well-defined regions reduce potential conflicts and enable RIRs to collaborate more effectively on global issues, knowing their specific responsibilities are clear. In summary, this principle supports a structured and decentralized model of Internet governance, reinforcing the autonomy and efficiency of RIRs while ensuring global coverage and cooperation.  
**Funmilayo ADEWUNMI (First Bright Technologies)**

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I see some merit in overlapping

**Piotr Strzyżewski (Personal capacity)**

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ensures a clear and non-overlapping division of responsibilities among RIRs. It promotes efficiency and avoids potential conflicts in resource allocation and management. By defining well-defined geographic boundaries, this principle contributes to the stability and sustainability of the global internet numbering system.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

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Clear boundaries are needed

**John Haydon (Education)**

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Is it reasonable to have regional RIR's and a global RIR where perhaps multinational providers are better served? Worth a discussion, not sure of the pros/cons yet..

**Ron da Silva (Network Technologies Globl)**

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Given the increasing geopolitical fragmentation and the expansion of satellite internet beyond terrestrial boundaries, the "not overlap" requirement should be reconsidered to allow for greater global connectivity and unity. The internet should serve as a bridge for all humanity, regardless of regional divisions.

**Chenyang Gao (NoPKT LLC)**

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### **5.3. Service Region - Neutral (3)**

see above, there is room for improvement

**Peter Koch (Individual)**

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A minimum number of nations should be defined to mean the "multinational" otherwise, it opens up the situation where a large country (in terms of landmass or population) will claim to be multinational and register a new RIR which may subsequently lead to State capture.

**Babagana Digima (Nigerian Communications Commission)**

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In agreement

**Mandisa Gama (IANET (PTY) LTD)**

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Have no issue if a RIR looks after another region

**Warwick Ward-Cox (Network Platforms)**

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There are two issues: (1) Multi national -> I'm not necessarily pro-multi national, and single nation RIRs is perhaps not bad, but politics are an issue. (2) overlap: the issue will be grey... and here it'll depends ion the RIRs with the overlap how/if they want to entertain it and to what level... ie. they could decide to NOT issue resources when another RIR issued resource for that area.

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

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Geographical regions are a bad choice in a global internet with global companies

**Elvis Velea (V4Escrow LLC)**

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the regions need to be big enough to be able to provide price parity. there should not be excessive price variations between regions, if this can't be done, then have fewer RIRs rather than more.

**Saul Stein (eNetworks)**

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Russia spans both the European continent and Asia, making it a transcontinental country. But what about the rights of the people living in Russia's far-east region? Should they just wait for services from RIPE-NCC? They might receive faster support from APNIC. It seems more practical to establish an intersectional service if services are to be allocated geographically. And what about people in Central Asia? What would happen if incidents similar to the AFRINIC events occurred again? Ensuring reliable and fair allocation of resources across diverse regions is crucial, especially considering the potential challenges posed by administrative boundaries and geopolitical issues.

**YingChu Chen (Taiwan Institute of Economic Research)**

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I could see smaller RIRs as a possibility. There are already NIRs that of course are not multinational.

**Mike Burns (IPTrading)**

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#### **5.4. Service Region - Somewhat Disagree (2)**

Regions bordering two RIR's should have the ability to choose which RIR better suit their needs as it regards support, language and training . This will be possible if there is overlap/ choice

**Colwayne Babb (Cable and Wireless)**

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Restricting overlap reduces flexibility and may ignore regional diversity

**Noel OUPOH (DATACONNECT AFRICA)**

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I do NOT see a reason to dis-allow small to medium overlap , with RIR's consulting with each other in said matters .

**James Laferriere (n/a)**

---

overlap is necessary at some level to ensure continuity of RIR services

**alexis ndoumga (ministry of posts and telecommunications)**

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The existence of NIRs already violate this principle, but overlapping service areas should not inherently be ruled out.

**Kevin Meynell (Individual)**

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## 5.5. Service Region - Strongly Disagree (1)

Once again, this is not a principle, but rather an implementation choice of a presumed principle that can be inferred to be “RIRs must not compete with each other.” If this inference is correct, this proposed principle should be justified as the rationale for this assertion isn’t immediately obvious. Speaking to the proposed implementation choice, as documented in RFC 7020, the first justification for why the RIR system was established was to “manage a limited resource pool.” Given this requirement and the need to reduce risk of “RIR shopping” to get around constraints imposed to extend the life of the limited IPv4 addresses, having geographic monopolies (arguably) made sense. However, with the exhaustion of the IPv4 free pool, the acceptance and formalization of the IPv4 address market, and the vast pools of IPv6 addresses and 32-bit autonomous system numbers, there is no longer any rational justification for geographic monopolies. Practically speaking, given inter-RIR transfers, the concept of regional geographic monopolies has already been overcome by events. Continuation of this outdated concept merely serves to increase costs/bureaucracy and reduce innovation and efficiency in the global Internet numbers registry system. As a proposed principle, registry service users should be able to choose which RIR they use based on the services provided and the fees charged.

**David Conrad (Layer 9 Technologies)**

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As nearly as I can tell, the geographic and geopolitical division that is the current norm was not at all present in RFC 1174, and is more or less assumed into existence in RFC 1366. There are reasons to suppose that in some large geographies, the history and sociopolitical realities (partly to do with language) might suggest that a community-of-communities approach could better match conditions on the ground than the simple one-RIR-to-rule geographic principle here. Arguably, one RIR has internal structural problems in its community (along the sociopolitical fault lines I suggest) that distracted it from attending to a more serious existential threat, and the global RIR system is suffering as a result. For Internet purposes, "geography" is good and useful when the geography does not present more irritation than it resolves.

**Andrew Sullivan (N/A)**

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See extended comments and analysis on the NANOG thread starting at <https://mailman.nanog.org/pipermail/nanog/2024-November/226586.html>

**William Herrin (Self)**

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Multiple RIRs should be able to service any given area. Because each RIR essentially has a monopoly, there is no incentive for cost control or excellence. As a result, recurring costs are quite high for very basic services and the quality of those services is low. We have seen some major failures in the past few years and the use of funds for things that are not the intended function of a RIR (eg: research grants) or unnecessary travel, which increases costs to customers. Competition would improve costs and quality.

**j heasley (SNI)**

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It should be noted that companies (and RIR members) are global and that services by RIRs are delivered without borders or boundaries in place. Trying to artificially limit the scope of an RIR is going to end in a failure of compliance.

**Terry Manderson (terrym.net Pty Ltd)**

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

**Sergey Kozhedub (IPTP Networks)**

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Question 12&13 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. 1- Strongly Disagree  
Answer: I completely disagree with this stipulation. Restricting an RIR to a large, multinational area without overlap limits flexibility and may overlook unique regional needs. Allowing overlapping regions can provide redundancy and enhance responsiveness to local challenges.

**Anjan Deka (HDFC)**

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The non-overlaps premise is gravely misplaced.

**Paul Hjul (Crystal Web)**

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## 6. Recognition

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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.

### 6.1. Recognition - Strongly Agree (5)

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

**Babagana Digima (Nigerian Communications Commission)**

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This seems essential.

**Jordan Carter (auDA)**

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Nothing to add or retract

**Brian Longwe (Converged Technology Networks)**

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yes of course. And a trial period is also important so as to evaluate and confirm afterwards.

**Emma Perrier (AFRINIC Ltd)**

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RIRs must have the organisational competence and capacity to perform this necessary role.

**Narelle Clark (Internet Association of Australia)**

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any organization seeking recognition as an RIR must meet the rigorous standards outlined in ICP-2. This guarantees that new RIRs are capable of fulfilling their responsibilities effectively and contributing to the stability and security of the global internet numbering system. By upholding these high standards, this principle helps maintain the integrity of the RIR ecosystem.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

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If any RIR fail its role, we should have right to remove it. And transfer to effective one.

**Kuo Wu (TWIGF)**

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must meet

**Filipe Coelho (TVCABO Angola)**

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I agree strongly with the principle that a Candidate RIR must meet, or be able to demonstrate it can meet, all the requirements outlined in ICP-2 to be recognized as an RIR. This standard is essential for ensuring that new RIRs have the capability and readiness to manage critical internet resources responsibly, effectively, and consistently with global standards. Here are key reasons supporting this principle: ICP-2 sets forth foundational standards to ensure that each RIR operates in a way that

supports the stability and consistency of the global internet infrastructure. Requiring Candidate RIRs to meet these standards helps uphold the stability of resource allocation and address management on a global scale. ICP-2 requires RIRs to demonstrate operational capacity, technical expertise, and robust administrative structures. By holding Candidate RIRs to these standards, the community can be confident that new RIRs are well-prepared to handle resource distribution without compromising quality or reliability. New RIRs must also demonstrate they can serve a clearly defined geographic region without overlapping with existing RIR regions. Meeting this requirement prevents resource allocation conflicts and ensures clarity for operators, governments, and users about which RIR serves their area, promoting harmony and efficiency in global internet governance. Recognized RIRs have an obligation to uphold transparency, fairness, and community-driven policy-making. A Candidate RIR that meets ICP-2 requirements demonstrates it can be accountable to the community it serves and supports inclusive, representative governance in alignment with existing RIR practices. ICP-2 requirements also address policy alignment, which ensures that Candidate RIRs can coordinate effectively with ICANN, the NRO, and other RIRs. This alignment allows for smoother collaboration, policy consistency, and responsiveness to global changes, such as IPv6 adoption and cybersecurity measures. The recognition process is designed to maintain the trust of network operators, governments, and other stakeholders in the RIR system. By verifying that a Candidate RIR meets all ICP-2 requirements, the community can have confidence that the new RIR is a reliable and capable steward of critical internet resources. Requiring a Candidate RIR to meet all ICP-2 requirements helps ensure that the new RIR has the technical and financial resources to scale sustainably. This is especially important in a region with growing internet demand, as it ensures the RIR can support future infrastructure and user needs effectively. While strict adherence to ICP-2 is essential for most requirements, there could be some flexibility for new RIRs to demonstrate “developmental readiness” for certain administrative or technical capabilities if they have concrete plans to achieve full compliance within a reasonable timeframe. Such flexibility might involve: a. Granting provisional recognition, allowing the Candidate RIR to operate under guidance until it fully meets the requirements. b. Defining specific milestones to meet full ICP-2 compliance gradually while under supervision by the NRO or an advisory group. However, this flexibility should not compromise the core requirements related to operational stability, resource management, and community accountability, as these are essential to maintaining the integrity of the RIR system.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

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For good governance

**Rita Kumi (Ghana Telecommunication Company)**

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I think good idea

**Raymond Mamattah (EGIGFA)**

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This principle is key to maintain consistency and expectations across all RIRs.

**Russell Woruba (PNG Department of ICT)**

---

That's ok

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

RIR candidate must be the required document before it can be elected or appointed

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

judicieux

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

Requiring demonstrable proof of compliance minimizes risks associated with unproven entities and builds trust among stakeholders.

**Andres Murcia (Xiaomi)**

---

It must be prepared to get into the arena.

**Luis Caceres (Corporacion Redexcom C.A.)**

---

The existing ICP-2 does not set sufficient requirements. The amendments should reinforce governance, accountability and anti-corruption measures.

**Paul Hjul (Crystal Web)**

---

It's a prerequisite

**Mike Burns (IPTrading)**

---

Yes, there is no point in a new RIR, if the quality standards and services towards their membership is going to degrade (when compared to the previous RIR servicing the region).

**Carlos Friaças (FCT\| FCCN)**

---

There is no point in forcing recognition of a deficient entity as an RIR. They'd need to immediately fix shortcomings or have recognition removed in a short period.

**Leo Vegoda (And Polus LLC)**

---

good and succinct

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

Duh...

**Sander Steffann (SJM Steffann Consultancy)**

---

## **6.2. Recognition - Somewhat Agree (4)**

Yes, if the project is to progress, all stakeholders must make efforts in this direction.

**Thierry Nagau (Dauphin Telecom)**

---



It is crucial for Candidate RIRs to meet specified requirements. However, I think it will be useful to consider a principle for phased recognition to allow candidates to develop and demonstrate their capabilities for sustainability over time

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

---

Sometimes, there is a need for more time

**Mark Elkins (Posix Systems)**

---

Vital

**John Haydon (Education)**

---

If the RIR meets 75% of the requirements, a provisional accreditation should be granted which validity doesn't laps beyond 12 months.

**Musa Stephen HONLUE (AFRINIC)**

---

### **6.3. Recognition - Neutral (3)**

There should be no force, regions should be allowed to operate

**Funmilayo ADEWUNMI (First Bright Technologies)**

---

80% of requirements

**Fabrice TEUGUIA (PCP-ACEFA)**

---

Nous voulons l'indépendance des RIR

**HERVE EGNAKOU (HOLOGRAM IDENTIFICATION SERVICES S.A.R.L)**

---

Yes

**Hann Jye Ng (MyTeksi Sdn Bhd)**

---

It would be better to see the requirements first.

**YingChu Chen (Taiwan Institute of Economic Research)**

---

Clearly RIRs should meet minimum requirements, but this assumes the proposed ICP-2 requirements are widely agreeable.

**Kevin Meynell (Individual)**

---

## 6.4. Recognition - Somewhat Disagree (2)

Not “can”: “will, within a reasonable but specific grace period”. Historically, this was the case – initially, while APNIC was able to do resource allocations by asking InterNIC to perform the actual allocations based on APNIC-specified recommendations, it did not become a “recognized RIR”, i.e., receive the 202/7 block specified in RFC 1466 and autonomy to do its own allocations from that block, until it had demonstrated to IANA that it had met the (informal at the time) “requirements” to be an RIR. If a Candidate RIR does not meet all the requirements specified in ICP-2 (whatever version), it would make sense to provisionally recognize the Candidate RIR but impose an explicit timeframe within which the remaining requirements will be met.

**David Conrad (Layer 9 Technologies)**

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Requiring a Candidate RIR to meet all ICP-2 requirements before recognition sets an unnecessarily high bar that could stifle the development of RIRs, especially in underserved regions. A more flexible approach—such as allowing provisional recognition while the Candidate RIR works to fully meet certain standards—would encourage growth and adaptation

**Noel OUPOH (DATACONNECT AFRICA)**

---

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.

**Lee Howard (IPv4.Global by Hilco Streambank)**

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## 6.5. Recognition - Strongly Disagree (1)

Question 14&15 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. 1- Strongly Disagree Answer: I completely disagree with this requirement. Mandating that a Candidate RIR meet all ICP-2 standards before recognition establishes an unnecessarily high threshold that could hinder the growth of RIRs, particularly in underserved areas. A more flexible approach, such as provisional recognition while the Candidate RIR works toward full compliance, would foster development and adaptability.

**Anjan Deka (HDFC)**

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## 7. Operation

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

### 7.1. Operation - Strongly Agree (5)

Cannot allow for drift away from requirements if the global system is to retain its integrity.

**Jordan Carter (auDA)**

---

This gives member service assurance

**Colwayne Babb (Cable and Wireless)**

---

I am strongly agree with that

**Thierry Nagau (Dauphin Telecom)**

---

Nothing to add or retract

**Brian Longwe (Converged Technology Networks)**

---

Consistently. If not, it should be revoked with immediate effect. By taking care of putting the resources & the staff in a safe place until the situation is improved.

**Emma Perrier (AFRINIC Ltd)**

---

In a open manor ie no hiding anything.

**Warwick Ward-Cox (Network Platforms)**

---

I strongly agree with the principle that a recognized RIR must continually meet all the requirements specified in ICP-2 in an auditable manner. This standard is vital for maintaining the integrity, accountability, and trustworthiness of each RIR in the global internet governance structure. Here are the key reasons supporting this principle: a. RIRs are trusted with critical responsibilities for IP address allocation and resource management within their regions. Continual compliance with ICP-2 requirements ensures that each RIR remains accountable to the community it serves and operates transparently, reinforcing stakeholder confidence. b. ICP-2 requirements cover operational, policy, and governance standards designed to ensure consistent and reliable service. Auditable, ongoing compliance ensures that RIRs maintain high standards of resource management, avoiding disruptions or inconsistencies that could affect regional and global internet stability. c. The internet is constantly evolving, with new technical, security, and governance challenges arising. Ongoing compliance with ICP-2 requirements ensures that RIRs stay aligned with current best practices, are prepared to adapt to changes, and can contribute effectively to the evolving global internet governance landscape. d. Over time, there can be a natural drift in an organization's policies, practices, or governance models, especially under new leadership or regional pressures. Regular audits against ICP-2 requirements help prevent such drift, ensuring that each RIR stays true to the standards and objectives it was recognized

for. e. RIRs must coordinate not only with local stakeholders but also with ICANN, the NRO, and other RIRs. Regular audits promote alignment with global standards, allowing RIRs to collaborate smoothly, share resources as needed, and contribute to a cohesive global policy environment that benefits users and network operators. f. The auditability aspect ensures that RIRs can demonstrate they have the technical, financial, and administrative capacity to manage their region’s growing internet demands. This capacity includes the ability to respond effectively to emerging issues like cybersecurity, IPv6 adoption, and resource depletion. g. RIRs operate on a community-driven model where policies are developed in an open, transparent way. Auditable compliance reassures stakeholders that their RIR operates transparently, upholds fair and inclusive policies, and is accountable to its community. To make this continuous, auditable compliance practical and effective, RIRs could: i. Each RIR could conduct regular internal reviews against ICP-2 standards, issuing public reports on its compliance status. This self-assessment could be supplemented by community feedback and open for public comment. ii. In addition to self-assessments, independent audits by a trusted third party could verify compliance objectively. This approach would add credibility to compliance claims and provide external validation of the RIR’s operations. iii. Where audits identify areas of non-compliance, the RIR should implement corrective actions, with transparent timelines and reporting on progress. These mechanisms would show a commitment to continuous improvement. Auditable, ongoing compliance with ICP-2 requirements promotes a Resilient Internet Infrastructure,enhances Global Cooperationand Builds Trust

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

Same question as before. What if because of issues this cannot be met. The case of AFRINIC

**Raymond Mamattah (EGIGFA)**

---

Audited by independent provider as well.

**Russell Woruba (PNG Department of ICT)**

---

It makes. Sense

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

it must ensure the standard and requirements are kept except otherwise

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

correcte

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

Essential for maintaining stakeholder confidence

**Andres Murcia (Xiaomi)**

---

Maintaining the standard is important.

**Luis Caceres (Corporacion Redexcom C.A.)**

---

RIRs should undergo annual audits with certain elements of the audit being annual and other elements of the audit being on 3 and 5 year cycles but such that each year all annual elements are audited and some 3 and 5 year elements are audited

**Paul Hjul (Crystal Web)**

---

They should be regular audits.

**Musa Stephen HONLUE (AFRINIC)**

---

How often will those audits occur? And by whom?

**Xavier Clark (Harris Computer)**

---

This seems to be a no brainer. :-)

**Carlos Friaças (FCT\| FCCN)**

---

The same caveat applies with respect to the ICP-2 principles being widely agreeable.

**Kevin Meynell (Individual)**

---

It's fundamental requirement.

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

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## **7.2. Operation - Somewhat Agree (4)**

I'm ok with this, but I suspect reaching a mechanism to ensure this is enforceable will be hard.

**Andrew Sullivan (N/A)**

---

RIRs maintain the highest standards of operation and accountability. By requiring continuous adherence to ICP-2 requirements and subjecting their operations to regular audits, it safeguards the integrity of the global internet numbering system and promotes transparency and trust in the RIR community. This principle also helps to identify and address potential issues before they escalate, ensuring the smooth and reliable operation of the internet.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

I think a principle that promotes phased independence, where new RIRs receive time-bound financial and operational support should be considered

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

---

yeah, that audit is a problem when there is money to be made.... IPv4 again ;(

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

Depends if you have a gun at your head....

**Mark Elkins (Posix Systems)**

---

Must be auditable

**John Haydon (Education)**

---

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

**Mike Burns (IPTrading)**

---

### **7.3. Operation - Neutral (3)**

There should be no such rule as this sounds so decentralized. RIRs are to be kept indepent, otherwise, this just creates chaos, disorder and conflicts.

**Noel OUPOH (DATACONNECT AFRICA)**

---

There should be fairness everytime

**Funmilayo ADEWUNMI (First Bright Technologies)**

---

Yes

**Hann Jye Ng (MyTeksi Sdn Bhd)**

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### **7.4. Operation - Somewhat Disagree (2)**

It remains unclear what "in an auditable fashion" means; also, the topic of (voluntary) retirement of an RIR needs to be addressed

**Peter Koch (Individual)**

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"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. Instead, as a principle, perhaps "An RIR, once recognized, must meet service level commitments mutually agreed upon between the RIR and its community."

**David Conrad (Layer 9 Technologies)**

---

## **7.5. Operation - Strongly Disagree (1)**

Question - 16-17 An RIR, once recognized, must continually meet all the requirements specified in ICP 2 in an auditable fashion. 1- Strongly Disagree Answer: I strongly disagree with this requirement. Mandating that an RIR continually meet all ICP-2 standards in an auditable manner undermines their independence. This could lead to chaos and conflict instead of fostering a decentralized approach that allows RIRs to operate effectively.

**Anjan Deka (HDFC)**

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## 8. Derecognition

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

### 8.1. Derecognition - Strongly Agree (5)

RIR has to work within the requirements of ICP 2 and the needs of the local governance.

**Noel OUPOH (DATACONNECT AFRICA)**

---

Yes completely agree. No grace period should be given. Too many tactics from a bad party can be done in the mean time.(the resources & the staff are at the mercy of such acts)

**Emma Perrier (AFRINIC Ltd)**

---

These entities cannot be guaranteed to operate in perpetuity without justification.

**Narelle Clark (Internet Association of Australia)**

---

Assuming that a smooth process is available for members to migrate issued resources to an alternative RIR be that an existing or replacing RIR.

**Jaco Kroon (Interexcel World Connection)**

---

I strongly agree with the principle that an RIR that fails to meet the requirements specified in ICP-2 should be subject to possible derecognition. This principle is critical for upholding the integrity, reliability, and accountability of the global RIR system. Here are key reasons supporting this principle: a. RIRs are entrusted with the management of vital internet resources for their regions, including IP addresses and Autonomous System Numbers. If an RIR fails to uphold ICP-2 standards, its ability to serve its community effectively is compromised, and this undermines trust in the RIR. The possibility of derecognition reinforces accountability and commitment to standards. b. ICP-2 sets forth requirements to ensure that RIRs operate consistently and effectively. If an RIR fails to meet these standards, it can create operational inconsistencies that impact not only its region but also the global internet community. Derecognition serves as a necessary measure to prevent instability and safeguard global resource allocation. c. The possibility of derecognition provides a strong incentive for RIRs to adhere to best practices, maintain transparency, and operate responsibly. This mechanism ensures that RIRs remain aligned with community expectations, stay responsive to changing technical and governance standards, and prioritize regional and global internet needs. d. Non-compliance with ICP-2 requirements can lead to conflicts within or across regions, particularly if it affects fair resource allocation, policy enforcement, or cooperation with other RIRs. By enforcing derecognition as a last resort, the internet governance community can avoid such conflicts and ensure that each RIR operates in harmony with the broader governance framework. e. RIRs operate under a community-driven model where stakeholders expect reliable, fair, and transparent service. An RIR that does not meet ICP-2 standards could jeopardize these principles, affecting end-users, network operators, and regional stakeholders. Derecognition is an important tool to protect the community's interests and ensure that each RIR serves effectively. f. RIRs work closely with ICANN, the NRO, and other entities in the global internet governance system. Non-compliant RIRs could disrupt the coordination and cooperation necessary for managing global internet resources. Derecognition ensures that only RIRs committed to



ICP-2 requirements remain in the system, supporting global alignment. g. Knowing that derecognition is possible encourages each RIR to regularly review its policies, practices, and governance structures. This environment fosters continuous improvement and responsiveness, ensuring that each RIR remains capable of managing internet resources responsibly in a dynamic environment.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

“Does not continue...” meaning its an intentional efforts not to comply.

**Russell Woruba (PNG Department of ICT)**

---

It makes sense

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

RIR should be allow to setup is requirement and operate itself without conflicting with the existng one.

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

peu recommande

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

perhaps a timeframe would be helpful here.

**Nancy Carter (no affiliation)**

---

Obviously subject to dispute resolution and accountability mechanisms.

**Jeff Neuman (JJN Soluions, LLC)**

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A structured remediation process prior to derecognition may provide an RIR with a fair opportunity to regain compliance while maintaining service continuity.

**Andres Murcia (Xiaomi)**

---

No

**Pedro Matos (The AM Lawyer)**

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May, but not must .... The derecognition process must entail due process following a failure to meet the audited requirements specified in ICP-2 as amended

**Paul Hjul (Crystal Web)**

---

The RIR should be notified and granted a grace period to amend all discrepancies

**Musa Stephen HONLUE (AFRINIC)**

---

I am not sure about the word 'recognize' and 'derecognize' why not use 'accredited' and 'deaccredited' instead?

**Adiel Akplogan (iNetSys)**

---

What will the grace period be, if there is one?

**Xavier Clark (Harris Computer)**

---

If we can't eject a non-compliant RIR, our form of governance has a dramatic weakness.

**Mike Burns (IPTrading)**

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Consider the choice of words: "may" leaves the choice with the NRO EC and ICANN. But that means a large number of networks have a deficient service unless the NRO EC and ICANN choose to act. A stronger word would be helpful because this isn't about the entity providing the RIR service but the networks and users relying on the quality of that service. While a deterministic "must" might be too strong, an RFC 8174 "SHOULD" could be helpful in placing a strong onus on the NRO EC and ICANN to explain why a deficient service is the best option available.

**Leo Vegoda (And Polus LLC)**

---

I would even recommend MUST rather than MAY

**Marco Marzetti (Console Connect)**

---

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.

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

It needs to be clearly defined what happens in such a situation (derecognition section?)

**Matthew Cowen (dgtlfutures)**

---

I like "may", although I expect more detail in the final ICP-2bis

**Sander Steffann (SJM Steffann Consultancy)**

---

## **8.2. Derecognition - Somewhat Agree (4)**

Should have a period to return to compliance before being derecognized.

**Darrell Budic (OHG Networks, LLC)**

---

See my previous remark. How will this be enforced?

**Andrew Sullivan (N/A)**

---

Yes, ICP-2 is a project that we are committed to, we must respect the protocols put in place and apply the policies decided.

**Thierry Nagau (Dauphin Telecom)**

---

accountability and upholds the integrity of the RIR system. By allowing for the derecognition of RIRs that fail to meet the required standards, it safeguards the stability and security of the global internet numbering system. This mechanism helps to maintain a high level of performance and reliability among RIRs, ultimately benefiting the entire internet community.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

Even in case of failure on the respect of procedure

**Fabrice TEUGUIA (PCP-ACEFA)**

---

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

**Brian Nisbet (HEAnet CLG)**

---

Vital

**John Haydon (Education)**

---

A process needs to be specified

**Randy Bush (IJJ Research Lab & Arrcus Inc)**

---

Since RIRs are accountable to their constituents, in theory nothing guarantees they need to stick with ICP-2. However, this is an unsolvable dilemma of necessary cooperation vs. consensus procedures, and some rails are required.

**David Lamparter (Westnetz w.V.)**

---

This implies that all requirements in the ICP-2 are essential/mandatory.

**Andrei Robachevsky (independent)**

---

It must be checked to see what's happening to regain all the requirements.

**Luis Caceres (Corporacion Redexcom C.A.)**

---

Assume there will be grace periods, opportunities for appeal, etch before recognition is withdrawn?

**Ron da Silva (Network Technologies Globl)**

---

It's not only "may be", a process should start to evaluate the situation. In some cases, it could be corrected.

**Carlos Friaças (FCT\FCCN)**

---

The bar for derecognition must be high as it might result in legal action. I'm in favor of the idea of having derecognition as part of ICP-2, as it is important to cover the whole lifecycle and all potential situations.

**Andrew Gallo (The George Washington University)**

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### **8.3. Derecognition - Neutral (3)**

No, it must be given a chance to rectify.

**Mandisa Gama (IANET (PTY) LTD)**

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I think persistent non-compliance with all requirements should lead to a de facto presumption of derecognition, rather than the less clear "should".

**Jordan Carter (auDA)**

---

Fairness is key

**Funmilayo ADEWUNMI (First Bright Technologies)**

---

so, how are you going to handle the already allocated resources? how about the costs/prices/etc. to be paid for those resources? Is this perhaps a money grabbing/greed issue? take IPv4 out of the picture, and I don't think it'll be an issue, but there in lies the problem again ;(

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

No idea

**Hann Jye Ng (MyTeksi Sdn Bhd)**

---

### **8.4. Derecognition - Somewhat Disagree (2)**

the may in this proposed principle is in conflict with the must in the second principle ("operation")

**Peter Koch (Individual)**

---

Historically, given "all" and "continually", this would have resulted in all five of the existing RIRs being subject to being de-recognized at one time or another. Requirements that include services/functionality, which is the case in the proposed principles, are typically defined in the context of service levels that are mutually agreed between the service provider and the consumer of those services. The principle here should probably be "An RIR that does not meet [IANA and/or] its community's service level commitments may be de-recognized." Since de-recognition is likely to be

contested, an implication of this proposed principle is that meeting the ICP-2 requirements should be objectively verifiable, ideally externally but at the very least, via an audit. This “objectively verifiable” requirement, and who will be doing the verification and how, should probably be explicitly stated as separate principles, e.g., something like: “All requirements that can result in de-recognition if they are not met must be objectively verifiable.” “Verification of whether an RIR meets ICP-2 requirements must be done in an open and transparent way by parties mutually agreed upon by the RIR and the community it serves.”

**David Conrad (Layer 9 Technologies)**

---

I think it should not be a straight forward easy issue as this. I foresee this could be used against AFRINIC soon.

**Raymond Mamattah (EGIGFA)**

---

The RIR should be given a reasonable amount of time to observe, take action, and provide a clear explanation as to why they are unable to meet all the requirements. After this justification, the RIR should be allowed time to rectify the issues and follow up to ensure all requirements are met. If the RIR believes any requirement is unjustified, they should follow the process of formally challenging it, rather than simply leaving it incomplete. However, if the RIR continues to fail in meeting the specified requirements under ICP-2, despite repeated notifications and opportunities for correction, they may ultimately face derecognition.

**Barkha Manral (Corporate Infotech Pvt Ltd)**

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consider that a short period should be given to align or correct any regulations that are not complying or to justify the reason for non-compliance. Consider that you must pay a temporary fine and prove that you are already complying with the rules.

**Erika del carmen Garay Obando (IBW)**

---

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.

**Kevin Meynell (Individual)**

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## **8.5. Derecognition - Strongly Disagree (1)**

RIR stakeholders only should be vested with power to derecognise RIR.

**Ubong Udofia (Skystar)**

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Question 18&19 Derecognition An RIR that does not continue to meet all the requirements specified in ICP-2 may be derecognized as an RIR. 1- Strongly Disagree Answer: I find this approach overly strict and potentially harmful to the Internet's regional infrastructure. Rapidly derecognizing an RIR for minor lapses in meeting ICP-2 requirements could destabilize operations. RIRs cater to diverse regions with unique challenges, and a more supportive strategy—such as offering guidance or a corrective

action period—would help them address issues without facing the severe consequence of derecognition.

**Anjan Deka (HDFC)**

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## 9. Community Support

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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.

### 9.1. Community Support - Strongly Agree (5)

This is one of the key principles that goes all the way back to IETF1366. Without broad community support it is extremely difficult for an RIR to operate.

**Mirjam Kühne (RIPE)**

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It is essential that any candidate be able to competently service the resource holders. This is best evidenced by measuring their support for the entity.

**Narelle Clark (Internet Association of Australia)**

---

Has to add effective legal contract to prevent someone wrong doing.

**Kuo Wu (TWIGF)**

---

I strongly agree with the principle that resource holders in a region must broadly support the recognition of a Candidate RIR as the RIR responsible for that region. This principle is essential for ensuring that an RIR's creation and operation are truly aligned with the needs and interests of its community. Here's why this principle is so crucial: a. Resource holders are the main beneficiaries of RIR services, and their support reflects whether the proposed Candidate RIR meets the needs of the community it intends to serve. Broad support indicates that the resource holders believe the Candidate RIR is well-prepared to manage resources fairly and transparently. b. An RIR's legitimacy derives largely from the trust and acceptance of the local internet community. Support from resource holders is critical to establishing this trust and gives the RIR a solid foundation for effective operations. Without such support, the Candidate RIR might struggle to gain the legitimacy needed to operate successfully in its region. c. Resource holders are a vital part of an RIR's governance structure, contributing to policy development and decision-making. Their broad support ensures that the Candidate RIR will be responsive and accountable to its community, upholding transparency and inclusivity in resource management. d. RIRs rely on the input of local stakeholders to develop policies that address regional needs. Support from resource holders indicates a strong community base that will engage in and uphold the RIR's policy processes. This buy-in fosters a collaborative environment, essential for effective policy development. e. A Candidate RIR's success depends on a sustainable base of resource holders willing to participate and financially support its operations. Broad support signals that the resource holders are committed to sustaining the RIR, enabling it to fulfill its responsibilities effectively. f. RIRs operate within a broader, globally coordinated framework. If resource holders support the Candidate RIR, it demonstrates that the RIR has the regional acceptance needed to operate in harmony with the global RIR system, reducing the risk of fragmentation or conflict.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

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I feel it is important to ensure that this does not lead to competing factions attempting to create RIRs. The revisions should reflect at what stage it is appropriate for the community to propose an RIR replacement (ie, only after decertification has been proposed or accepted.)

Douglas Camin (Coordinated Care Services, Inc.)

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As community members, they must be supporting the candidate

Russell Woruba (PNG Department of ICT)

---

complementarite

FARADJ MAHAMAT DJADDA (ministry of ICT)

---

This principle fosters trust and alignment between the RIR and its community, which is essential for successful governance

Andres Murcia (Xiaomi)

---

"Region" should be considered based on those established in the generic political maps.

Lia Solis (personal)

---

It is imperative that the focus rest on "Resource Holders" and not politically connected gangsters and crooks. The existing RIRs (save RIPE) undermine Resource Holders

Paul Hjul (Crystal Web)

---

A RIR doesn't exist without members, and they should only exist to serve specificities of a subset of network operators.

Musa Stephen HONLUE (AFRINIC)

---

I guess there will be a precise definition of 'broad support'.

Adiel Akplogan (iNetSys)

---

Yes, resource holders and also governments.

Carlos Friaças (FCT\FCCN)

---

need to define "broadly" and set specific targets

Matthew Cowen (dgtlfutures)

---

## 9.2. Community Support - Somewhat Agree (4)

Principle seems fine - implementation might need to deal with fragmented or disputatious regions.

Jordan Carter (auDA)

---



Provided the RIR acts in the best interests of the region and community

**Warwick Ward-Cox (Network Platforms)**

---

Africa seems to have a particularly tough time dealing with consensus vs democracy.

**Jaco Kroon (Interexcel World Connection)**

---

This principle underscores the importance of local support for a Candidate RIR. By requiring broad support from resource holders in the proposed service region, it ensures that the RIR is aligned with the needs and priorities of the local community. This fosters a stronger relationship between the RIR and its constituents, leading to more effective and responsive service delivery.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

It should 80% of resource holders

**Fabrice TEUGUIA (PCP-ACEFA)**

---

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

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

---

Q: define "broadly"? Number/size of resources held, or one member one vote? When number/size: how do you compare IPv4 vs IPv6 sizes?

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

In the current timeline in which we live, consensus can be messier than one might hope

**Randy Bush (IIJ Research Lab & Arrcus Inc)**

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This clause seems to imply that ALL resource holders must "broadly support" the candidate RIR; but the intent is probably that there is "broad support" across the community of resource holders. "Broad support" seems to be undefined and may be better replaced by the term "rough consensus" which is more recognised and accepted within the Internet community.

**PAUL WILSON (private individual)**

---

Broadly is broad

**Mike Burns (IPTrading)**

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Given that all regions and economies are covered and served by an RIR, a proposal for a new RIR is, essential, secession from an existing RIR. Would the community from which this new RIR is leaving have any say in the potential shrinkage of the community?

**Andrew Gallo (The George Washington University)**

---

I prefer describing Community Support in passive voice like Candidate RIR must have broad support for the recognition from Resource Holders in the Region it proposes to serve because I think it will fit more for the reality of getting the support

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

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### **9.3. Community Support - Neutral (3)**

Love is key

**Funmilayo ADEWUNMI (First Bright Technologies)**

---

If the RIR will be the only RIR in the region should it be necessary for participants to agree; ie: prevent the annexing of an area. If a new RIR wishes to offer service to an area, they should be permitted, period.

**j heasley (SNI)**

---

put a better definition for "Broadly" .

**James Laferriere (n/a)**

---

This is very controversial. I suspect resource members could be bribed by a candidate RIR to support them. This is not a safe haven for AFRINIC

**Raymond Mamattah (EGIGFA)**

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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.

**Kevin Meynell (Individual)**

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### **9.4. Community Support - Somewhat Disagree (2)**

Space being "slowly" deployed, this requirement is too stringent for space.

**Marc Blanchet (Viagenie)**

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A candidate RIR should be allowed to serve a limited region or set of customers

**Elvis Velea (V4Escrow LLC)**

---

## 9.5. Community Support - Strongly Disagree (1)

This proposed principle is entitled “Community Support” but specifies a subset of the multistakeholder community all RIRs serve. Unless it is the intent for ICP-2 version 2 to redefine an RIR’s “community” to be only the RIR’s resource holders, it is important to acknowledge the other stakeholders that make up the RIR’s community. Some of these other stakeholders would include governments, civil society, non-resource holding entities, etc. These stakeholders must play a role in the establishment of an RIR. Further, as mentioned previously, the concept of regional monopolies no longer makes sense in today’s Internet. A more appropriate principle would probably be “Relevant stakeholders within the Candidate RIR’s community must broadly support recognizing the Candidate RIR as the RIR responsible for providing registry services for that community.”

**David Conrad (Layer 9 Technologies)**

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That does not make sense. This would just delay the recognition of an RIR and create barriers for emerging regions. The focus should be on the RIR’s capacity to meet the region’s needs, not on securing approval from all stakeholders.

**Noel OUPOH (DATACONNECT AFRICA)**

---

Limiting the support to "resource holders in the region" does not align to a global internet, but walks to a belief that the internet is regional. That may have been the case in the developing days of the internet, however I argue that is not the case today.

**Terry Manderson (terrym.net pty ltd)**

---

Pas possible car ,il peut arriver qu'un seul détenteur s'arrange pour avoir plus de pouvoir sur les ressources acquises de manieres non recommandées

**Nico Tshintu bakajika (ISPA-DRC)**

---

Question 21&22 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. 1- Strongly Disagree I find this requirement unreasonable. It could significantly delay the recognition of an RIR and create unnecessary barriers for emerging regions. The emphasis should be on the RIR’s ability to address the needs of the region, rather than obtaining approval from all local stakeholders.

**Anjan Deka (HDFC)**

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## 10. Community Commitment

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

### 10.1. Community Commitment - Strongly Agree (5)

Related to the previous principles, this is key to success.

**Mirjam Kühne (RIPE)**

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It is incumbent on an RIR to ensure that it maintains a level of engagement with resource holders that ensure their active participation

**Brian Longwe (Converged Technology Networks)**

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YES! We see what is happening at AFRINIC, the community is non existent, and we are struggling.

**Emma Perrier (AFRINIC Ltd)**

---

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

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

This makes perfect sense

**Mark Elkins (Posix Systems)**

---

I fully support the principle that a Candidate RIR must demonstrate both financial backing and active participation in governance from its community. This principle is fundamental for ensuring that the RIR is sustainable, accountable, and able to effectively serve the needs of its stakeholders. Financial support ensures operational viability, while governance participation ensures that the RIR remains responsive and transparent. Together, these elements foster a strong and effective RIR system that can meet the demands of the evolving internet landscape.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

This is a good idea, however, it will become an issue of he who the most funds prevails. This would not be an battle grounds for those without good funds.

**Raymond Mamattah (EGIGFA)**

---

Agreed. An RIR is only as strong as its members.

**Russell Woruba (PNG Department of ICT)**

---

**Umar Abdullahi (Friends Wireless Ltd)**

The Candidate who is holding the position of RIR must encourage is community to contribute both financial and other necessary support needed

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

correcte

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

Financial and governance support from the community are fundamental indicators of the Candidate RIR’s viability and sustainability

**Andres Murcia (Xiaomi)**

---

It is a good principle.

**Carlos Friaças (FCT\| FCCN)**

---

This is critical. I wonder how this might be judged and what criteria the NRO would use to evaluate such demonstrations of community support.

**Andrew Gallo (The George Washington University)**

---

The definition of 'community' is the detail here.

**Kevin Meynell (Individual)**

---

a definition of the bar to reach and what happens if it is not met. What does "support" mean, ie what is its definition?

**Matthew Cowen (dgtifutures)**

---

**10.2. Community Commitment - Somewhat Agree (4)**

Not all regions can support RIR financially and participate actively by the especially in less developed region. “MUST” might be too strong a word to use here. Reasonable support should be demonstrated by the candidate RIR with financial plan that demonstrates sustainability.

**Alban Kwan (CSC)**

---

Measures for this will need to be developed and made sure to be practical.

**Jordan Carter (auDA)**

---

that a Candidate RIR has a strong foundation of community support. By requiring both financial and active participation in governance, it guarantees that the RIR has the resources and the engagement necessary to operate effectively and sustainably. This commitment from the community helps to build a robust and resilient RIR that can meet the evolving needs of its stakeholders.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

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

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

---

Vital to be part of it's governance

**John Haydon (Education)**

---

This seems duplicative of the clause on "broad support"; or else it is an attempt to define the meaning of board support. In either case the 2 clauses could be better phrased or combined into one.

**PAUL WILSON (private individual)**

---

a Candidate RIR should not be limited to a non-for-profit type of organization. Comercial entities should be allowed to become an RIR and fund themselves through whatever means they choose.

**Elvis Velea (V4Escrow LLC)**

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### **10.3. Community Commitment - Neutral (3)**

If the RIR fails to attract customers, it will fail all on its own. No need for the community to make any other endorsements.

**j heasley (SNI)**

---

This portion is the definition for "Broadly" in the previous "Community Support" .

**James Laferriere (n/a)**

---

The best way community can show their support of (new) RIR is by transferring resources to this RIR. RIR recognition process should not be complicated but derecognition should be backed in a way to ensure continuous operation of resource holders.

**Sergey Kozhedub (IPTP Networks)**

---

Ok

**Hann Jye Ng (MyTeksi Sdn Bhd)**

---

I agree

**Erika del carmen Garay Obando (IBW)**

---

Unless "community" is properly defined the important consideration is "Resource Holders"

**Paul Hjul (Crystal Web)**

---

What does community mean here : Ressource holders ?

**Adeola Alain P. AINA (Digital Intelligence Services, Sarl)**

---

How is that willingness demonstrated for a candidate RIR?

**Mike Burns (IPTrading)**

---

#### **10.4. Community Commitment - Somewhat Disagree (2)**

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

**Peter Koch (Individual)**

---

Requiring a Candidate RIR to demonstrate financial backing and active governance participation before recognition could unnecessarily hinder the development of RIRs, especially in regions with limited resources

**Noel OUPOH (DATACONNECT AFRICA)**

---

cette question n'a pas la raison d'être

**Nico Tshintu bakajika (ISPA-DRC)**

---

Most of the financial support as well as participation in the governance comes from the resource holders. Should that be "Resource Holders in the Region that the Candidate RIR proposes to serve"?

**Andrei Robachevsky (independent)**

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#### **10.5. Community Commitment - Strongly Disagree (1)**

While it is obviously a requirement that the community being served by the Candidate RIR be financially supported by (at least the resource holder part of) the community, "actively participating in its governance" suggests the "community", however it is defined, must engage both when the RIR is created and continually thereafter or the Candidate RIR will not be recognized (or lose the recognition it has gained). This is unrealistic and arguably, all RIRs today would fail this principle. Pragmatically, it would probably be more realistic to have a principle that states that a community can, at any time, explicitly withdraw its support for an RIR, which can lead to the de-recognition of the RIR if the reasons for that withdrawal are not cured within a reasonable grace period.

Question 22&23 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. 1- Strongly Disagree Answer: I believe this requirement is overly restrictive. Mandating that a Candidate RIR show financial backing and active governance participation prior to recognition could significantly hinder the development of RIRs, particularly in resource-limited regions.

**Anjan Deka (HDFC)**

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The community might not be aware of the value a RIR can bring, so this should not be a consideration.

**Musa Stephen HONLUE (AFRINIC)**

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## 11. Independence

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An RIR must be financially stable and independent.

### 11.1. Independence - Strongly Agree (5)

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

**Mirjam Kühne (RIPE)**

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Yes but some may not be able to stay financially independent until it is stabilised.

**Alban Kwan (CSC)**

---

Any RIR must be able to fund its operations and pay its bills as and when they fall due.

**Narelle Clark (Internet Association of Australia)**

---

could be supported by other RIRs

**Tahar Schaa (Neuland@Homeland)**

---

This is necessary in order not to depend on governments and policies

**alexis ndoumga (ministry of posts and telecommunications)**

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Of course

**Kuo Wu (TWIGF)**

---

the problem is when you have high monetary value IPv4... there the independence is easily thwarted by greed and money

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

I strongly support the principle that an RIR must be financially stable and independent. This principle ensures that the RIR can operate effectively, transparently, and sustainably, while maintaining the trust and confidence of its stakeholders. Financial stability enables the RIR to meet its obligations, adapt to change, and engage in long-term strategic planning, while financial independence safeguards its autonomy and integrity in decision-making. This is essential not only for the RIR itself but also for the broader internet governance framework, which relies on a system of independent, trusted, and accountable RIRs to manage the global internet resources.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

The Board should be subject to the jurisdiction of registration's governing and fiduciary duties.

**Russell Woruba (PNG Department of ICT)**

---

yes, you must be financially buoyant to be independent

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

tout a fait

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

This can foster trust, minimize costs for members, and ensure resources

**Andres Murcia (Xiaomi)**

---

It seems to me obvious.

**Luis Caceres (Corporacion Redexcom C.A.)**

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Properly audited financial statements and accountability to Members are vital.

**Paul Hjul (Crystal Web)**

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I considered whether a multi-governmental agency could financially support an RIR, but decided it would then no longer be independent; the agency would eventually expect to exert some influence. However, I have no reservations about new RIRs receiving startup support, or RIRs sharing software and practices.

**Lee Howard (IPv4.Global by Hilco Streambank)**

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Clearly desirable and reasonable.

**Andrew Gallo (The George Washington University)**

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Yes, but we don't want RIRs with huge reserves or investment funds. The RIR should have enough reserve to see it through a tough time but not so much that they become a target for raiders etc...

**Leo Vegoda (And Polus LLC)**

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Given that RIRs rely on membership and resource fees from LIRs/ISPs for funding, they may become influenced by large members with significant resources. This could lead to a fear of losing major members and funding, which may cause RIRs to favor larger members in policy-making and pricing. Therefore, the definition of "financial independence" should be clarified to ensure true impartiality.

**Chenyang Gao (NoPKT LLC)**

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There can be different funding models, so this requirement should not be prescriptive.

**Kevin Meynell (Individual)**

---

## 11.2. Independence - Somewhat Agree (4)

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.

**Eric Edora (TELUS Communications Inc.)**

---

Correct, in order to function.

**Mandisa Gama (IANET (PTY) LTD)**

---

Sounds good, but independent from what or who?

**Jordan Carter (auDA)**

---

The stability and financial independence of an RIR are essential to ensure efficient service and adequate management of Internet resources.

**Thierry Nagau (Dauphin Telecom)**

---

I'd say yes, but we've seen situation about where AFRINC accounts were frozen, we needed help eventhough we were stable and independent. We need to address situation where a Court freeze an RIR bank account.

**Emma Perrier (AFRINIC Ltd)**

---

Crucial

**Funmilayo ADEWUNMI (First Bright Technologies)**

---

that RIRs are not subject to undue influence from external entities. 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.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

I suggest we consider a principle that promotes phased independence, where new RIRs receive time-bound financial and operational support.

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

---

s/must/should/ startup and changes can be financially difficult

**Randy Bush (IIJ Research Lab & Arrcus Inc)**

---

Independence needs to be explained, as a political and organisational independence. Of course the RIR will depend on funding from its community, including any sources of incomes that are deemed to be acceptable by the RIRs membership.

**PAUL WILSON (private individual)**

---

Independent from what and who?

**Elvis Velea (V4Escrow LLC)**

---

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

**Mike Burns (IPTrading)**

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I think it better to put other aspects of stability than only financial.

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

### **11.3. Independence - Neutral (3)**

Why? If an RIR fails, another RIR can be established or assume their customers.

**j heasley (SNI)**

---

Again , "Independant" of what ? Their members ? I hope NOT . Again definition , as it regard their Duties to their members & their function as RIR .

**James Laferriere (n/a)**

---

Agree

**Hann Jye Ng (MyTeksi Sdn Bhd)**

---

### **11.4. Independence - Somewhat Disagree (2)**

It remains unclear from whom the RIR must be independent

**Peter Koch (Individual)**

---

Independence from the donor and government support

**Andrei Robachevsky (independent)**

---

## 11.5. Independence - Strongly Disagree (1)

Without defining what “financially stable” and “independent” mean, this is impossible to know the intent of this principle or why they’re tied within the principle titled “independence” – they are two distinct concepts. A principle of “financial stability” should probably be dealt with in the general principle that states an RIR must be operationally stable, which implies stability of finances along with other attributes such as service stability, corporate governance stability, policy definition process stability, etc. In terms of being independent, a dictionary definition of independence is “to have freedom from outside control or support.” An RIR must be supported by its community, financially, legislatively/regulatorily, and otherwise, so it obviously can’t and shouldn’t be independent of its community. RIRs also must obviously abide by the laws of the jurisdiction in which it operates. Further, since one of the reasons for revising ICP-2 is to allow for de-recognition, it implies there must be some outside control(s) (e.g., community, ICANN, etc.) For a principle entitled “independence”, I’d recommend simply saying: “An RIR must be free from undue outside control or support.”

**David Conrad (Layer 9 Technologies)**

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Question 24&25 Independence An RIR must be financially stable and independent. 1- Strongly Disagree Answer: I believe this requirement is overly stringent. It may not be realistic for all RIRs, particularly those in emerging or underserved regions. Achieving financial stability and independence often takes time, and some RIRs may require support or collaboration to reach these objectives.

**Anjan Deka (HDFC)**

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## 12. Not-for-Profit

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

### 12.1. Not-for-Profit - Strongly Agree (5)

Within a region the RIR is a monopoly, in this scheme. It is in the interests of resource users that there is no structural incentive to boost revenue or under-invest created by allowing a profit motive.

**Jordan Carter (auDA)**

---

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.

**Thierry Nagau (Dauphin Telecom)**

---

I agree with the principle that "An RIR must operate on a not-for-profit basis." This approach aligns with the mission of RIRs to serve the public good by ensuring fair and equitable distribution of Internet resources. Operating as not-for-profit organizations ensures that:

- Focus Remains on Community Benefit: Resources and revenues are reinvested into improving services, infrastructure, and community support rather than generating profit for shareholders.
- Promotes Fairness: A not-for-profit model helps maintain fairness in resource allocation, avoiding potential conflicts of interest that could arise in profit-driven operations.
- Ensures Accountability: Not-for-profit status enhances accountability to the communities they serve, as decisions are driven by collective benefit rather than financial motives.
- Supports Long-Term Sustainability: By prioritizing public good over profit, RIRs can focus on stable, sustainable operations that benefit the global Internet ecosystem.

This principle is critical for upholding the trust and integrity of the RIR system while ensuring resources are managed in the best interest of the global Internet community.

**Funmilayo ADEWUNMI (First Bright Technologies)**

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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.

**Narelle Clark (Internet Association of Australia)**

---

An RIR should not be in business for profit nor be involved in any other business than providing IR functions - at the best price possible.

**j heasley (SNI)**

---

The RIR may run as a Not-for-profit /corporation/, that is internal it should ensure operational efficiency and profitability, however any operating profit thus produced should not be distributed as dividends but rather reinvested in the business.

**Cameron Smith (Bubble Cloud Mozambique S.A.)**

---

It should extend to those RIRs foundation too.

**Kuo Wu (TWIGF)**

---

This is absolutely vital.

**Brian Nisbet (HEAnet CLG)**

---

but again... uyou have a non-profit, with very profitable IPv4 address space... the contradiction in terms?

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

I strongly support the principle that an RIR must operate on a not-for-profit basis. This model ensures that the RIR remains true to its mission of serving the internet community, promotes fairness and transparency, and prevents conflicts of interest. Operating without a profit motive allows an RIR to reinvest in its services and infrastructure, fostering long-term stability and growth for the global internet ecosystem. Ultimately, a not-for-profit approach supports the values of internet governance, which prioritize the public good and collaborative efforts to maintain a stable, inclusive, and equitable internet.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

il ne faut pas permettre à une organisation qui au depart etait lucrative et puis se transforme en une organisation non lucrative pour pretendre se transformer en candidat RIR , ça sera de la tricherie

**Nico Tshintu bakajika (ISPA-DRC)**

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Continuing the operation of these organizations at not-for-profit organizations is critical to ensuring the focus remains on serving the membership and the community.

**Douglas Camin (Coordinated Care Services, Inc.)**

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It should be allowed to create a foundation for fund-raising.

**Russell Woruba (PNG Department of ICT)**

---

It makes sense for it to operate on a non for profit

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

it's a non profit organisation where Identity are met

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

Ensuring the governing body has effective control safeguards the RIR's direction and keeps decision-making close to the community it serves.

**Andres Murcia (Xiaomi)**

---

A RIR should never operate as a competitive market player, as such it makes no sense for it to be a profit business.

**David Lamparter (Westnetz w.V.)**

---

This is absolutely essential.

**PAUL WILSON (private individual)**

---

To be clear, it must be chartered to operate for public benefit for registration of internet numbers and related services, not that it must never receive more in revenue than it spends.

**Lee Howard (IPv4.Global by Hilco Streambank)**

---

This is the foundation to enable cooperation between RIRs. This is how the Internet came to light.

**Carlos Friaças (FCT\FCCN)**

---

simple agreement

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

## **12.2. Not-for-Profit - Somewhat Agree (4)**

To a certain extent.

**Emma Perrier (AFRINIC Ltd)**

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that RIRs prioritize the interests of the internet community over profit-driven motives. By operating on a not-for-profit basis, RIRs can allocate resources efficiently, maintain transparency, and avoid conflicts of interest. This fosters a more equitable and sustainable internet ecosystem where the needs of all stakeholders are considered.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

This is vital

**John Haydon (Education)**

---

tout a fait

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

I agree with the principle that an RIR (Regional Internet Registry) should operate on a not-for-profit basis. This model ensures that the allocation of Internet number resources—such as IP addresses and Autonomous System Numbers—is done fairly, transparently, and in the public interest. By prioritizing equitable access over profit, the not-for-profit structure helps avoid conflicts of interest and ensures



that resources are distributed according to need, not financial capacity. A not-for-profit approach also aligns with broader Internet governance principles, such as openness, fairness, and sustainability. RIRs manage a global, shared resource, and their not-for-profit status helps build trust among all stakeholders, including governments, ISPs, and other organizations. Furthermore, any surplus funds generated through fees can be reinvested into enhancing services and infrastructure, supporting the long-term stability and development of the global Internet ecosystem. In this way, the not-for-profit model is essential for ensuring that RIRs meet their responsibilities in a manner that benefits the global community as a whole.

**Barkha Manral (Corporate Infotech Pvt Ltd)**

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I tend to agree with this. But corporate organization models can vary widely and I wonder if this requirement for 'not-for-profit' might be too limiting. If all the other principles are met, how important would the RIR's operating model be?

**Andrew Gallo (The George Washington University)**

---

The definition of 'not-for-profit' needs detailing.

**Kevin Meynell (Individual)**

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**12.3. Not-for-Profit - Neutral (3)**

Depends on the meaning of not for profits, most non profits organise relies on external financial support to survive. The concept of social enterprise is probably more fitting for RIR - a type of for profit organisation with the aim to be self sufficient and able to use the profit to advance certain social goals. The emphasis is that the social enterprise must be commercial viable, hence profit oriented, however the goal is not profit maximisation for shareholders but maximisation of social goals.

**Alban Kwan (CSC)**

---

the institution needs a budget for the functioning

**Fabrice TEUGUIA (PCP-ACEFA)**

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I am not sure being a non-profit or for-profit really relates to whether the organization complies with ICP2 principles (other than being non-profit)

**Jeff Neuman (JJN Solutions, LLC)**

---

Agree

**Hann Jye Ng (MyTeksi Sdn Bhd)**

---

I do think that becoming a profit making organisation, might push the RIRs to work harder than what we are observing.

**Musa Stephen HONLUE (AFRINIC)**

---

## 12.4. Not-for-Profit - Somewhat Disagree (2)

There are doubts that the term not-for-profit can be universally applied

**Peter Koch (Individual)**

---

Requiring an RIR to operate on a not-for-profit basis may limit its ability to innovate, scale, and attract necessary resources for sustainability. A for-profit model could provide the flexibility needed for growth, encourage efficiency, and attract investments that enable the RIR to better serve its community

**Noel OUPOH (DATACONNECT AFRICA)**

---

There is no fundamental reason why RIRs should be non-profit organizations. There are good market reasons why a for-profit RIR will not be able to succeed against a non-profit RIR. IF RIRs are (as they currently are) afforded a monopolistic position through preventing overlap then RIRs must be not-for-profit. The existing RIRs might operate on a not-for-profit basis officially but in proper economic analysis the entities aren't true "operate at cost" entities but rather at severe risk of passing on profits to staff and executives.

**Paul Hjul (Crystal Web)**

---

disagree. A commercial RIR may be able to provide better services to customers.

**Elvis Velea (V4Escrow LLC)**

---

Maybe a for-profit RIR would be the most stable and independent? Maybe resource holders could be shareholders? Not for this limitation.

**Mike Burns (IPTrading)**

---

## 12.5. Not-for-Profit - Strongly Disagree (1)

This doesn't appear to be a principle, rather it is an implementation option based on an assertion that appears to be making certain assumptions about the implications of for-profit versus not-for-profit operation without stating what those assumptions are or justifying them in any way. Typically, for-profit vs. not-for-profit denotes (a) how performance is measured, (b) how income surplus over operating expenses is handled/disbursed, and (in some cases) (c) how the organization is taxed and what regulatory regime it operates under. Intuitively, I believe it generally makes sense to have as a principle that states income derived from the community served can only be spent on supporting and operating the services that serve the community, not provided to outside parties such as investors, shareholders, sponsors, etc. How the RIR is organized to meet that principle is an implementation detail, not a principle.

**David Conrad (Layer 9 Technologies)**

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they have to make money in order to support their activities

**alexis ndoumga (ministry of posts and telecommunications)**

---

Question 26&27 Not-for-Profit An RIR must operate on a not-for-profit basis. 1- Strongly Disagree  
Answer: I believe that mandating an RIR to operate on a not-for-profit 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.

**Anjan Deka (HDFC)**

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## 13. Corporate Governance

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

### 13.1. Corporate Governance - Strongly Agree (5)

We should have a fixed minimum of universal corporate governance requirements defined by ICANN for this.

**Babagana Digima (Nigerian Communications Commission)**

---

Above all, compliance with the legislation on the geographical areas on which it depends

**Thierry Nagau (Dauphin Telecom)**

---

Nothing to add or detract

**Brian Longwe (Converged Technology Networks)**

---

consistent internationally rather than just local jurisdiction

**Aftab Siddiqui (AFTABSIDDIQI-AU)**

---

Of course

**Kuo Wu (TWIGF)**

---

It is important to work while respecting the procedures

**Fabrice TEUGUIA (PCP-ACEFA)**

---

... or must relocate their offices to a different jurisdiction

**Mark Elkins (Posix Systems)**

---

I strongly agree with the principle that an RIR must follow corporate governance procedures consistent with best practices in its jurisdiction. This ensures transparency, accountability, ethical conduct, and legal compliance, while also promoting effective decision-making, long-term sustainability, and trust with stakeholders. Additionally, adherence to best practices helps ensure that the RIR remains aligned with international standards and is capable of navigating the evolving challenges of internet governance. Ultimately, this principle supports the integrity, efficiency, and credibility of the RIR, enabling it to serve its mission in a responsible and effective manner.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

Very much in agreement.

**Russell Woruba (PNG Department of ICT)**

---

Due to differences in Idles, values, culture etc

**Emmanuel Egbe (Nigeria)**

---

Corporate Governance procedures must be consistent and strictly adhere to

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

d'accord

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

Documentation promotes accountability, while neutrality ensures that policies are fair and unbiased.

**Andres Murcia (Xiaomi)**

---

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.

**David Lamparter (Westnetz w.V.)**

---

not only in its jurisdiction, but best international practices, incorporating its jurisdiction

**Saul Stein (eNetworks)**

---

Yes, unless there would be an international statute, which is kind of difficult to obtain.

**Carlos Friaças (FCT\| FCCN)**

---

Clearly desirable and reasonable.

**Andrew Gallo (The George Washington University)**

---

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

**Leo Vegoda (And Polus LLC)**

---

Good to point out the importance of consistency in its jurisdiction

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

I like "in its jurisdiction" so we don't enforce "western" practices on other cultures

**Sander Steffann (SJM Steffann Consultancy)**

---

### 13.2. Corporate Governance - Somewhat Agree (4)

RIRs maintain high standards of governance, transparency, and accountability. By adhering to best practices in their respective jurisdictions, RIRs can build trust with their stakeholders and operate in a responsible and ethical manner. This promotes good governance, reduces the risk of mismanagement, and strengthens the overall reputation of the RIR community.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

Just a fact .

**James Laferriere (n/a)**

---

depends on the jurisdiction....

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

Vital

**John Haydon (Education)**

---

best practices is an ambiguous and perhaps subjective term. This could lead to misinterpretation

**Nancy Carter (no affiliation)**

---

Best practices are under threat in many parts of the world.

**Randy Bush (IIJ Research Lab & Arrcus Inc)**

---

Unclear how this should work given the multi-national nature of RIRs. Should a vote be held to determine the most favorable jurisdiction for the RIR to be headquartered?

**Xavier Clark (Harris Computer)**

---

Hope the jurisdiction chosen is a good one

**Mike Burns (IPTrading)**

---

Well this is simple a legal requirement. However, jurisdictions must be chosen for incorporating the RIR that are supportive of international practices and global technical coordination activities.

**Kevin Meynell (Individual)**

---

### 13.3. Corporate Governance - Neutral (3)

There is something unfortunate in nailing this to "best practices in the jurisdiction" because if the jurisdiction changes itself changes

**Andrew Sullivan (N/A)**

---

Imposing strict corporate governance procedures based on jurisdictional best practices may not align with the needs or realities of all RIRs. RIRs should have the flexibility to adopt governance models that best serve their community's unique circumstances.

**Noel OUPOH (DATACONNECT AFRICA)**

---

That might not be at the best interest of an RIR, another system needs to be out in place to safe guard the RIR's reosources and staff of potential threats.

**Emma Perrier (AFRINIC Ltd)**

---

There should be fairness and consideration

**Funmilayo ADEWUNMI (First Bright Technologies)**

---

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.

**Cameron Smith (Bubble Cloud Mozambique S.A.)**

---

This is the problem of AFRINIC. So imagine the RIR operates in a jurisdiction that allows human rights abuse will the RIR go by that? I think the RIRs must have a standard policy to be respected by all RIRs.

**Raymond Mamattah (EGIGFA)**

---

I don't know enough about governance procedures in other parts of the world to decide if this would be "enough" governance.

**Sebastian Wiesinger (noris network AG)**

---

RIRs must be established in appropriate jurisdictions such as Mauritius, the Netherlands and the UK. They must follow the best corporate governance procedures of the jurisdiction of their seat which jurisdiction must be a jurisdiction following best global corporate governance practice. The must follow both best domestic practice and best international practice.

**Paul Hjul (Crystal Web)**

---

#### **13.4. Corporate Governance - Somewhat Disagree (2)**

“Best practices in its jurisdiction” may conflict with ICP-2/global interests. A global baseline for corporate governance for all RIRs, e.g., transparency, accountability, openness, etc., must be established – if the jurisdiction is or becomes incompatible with that baseline, it precludes the establishment or continued operation of an RIR in that jurisdiction.

**David Conrad (Layer 9 Technologies)**

---

RIR should rule

**Filipe Coelho (TVCABO Angola)**

---

I think best practices should be governing the selection of the jurisdiction, not other way around.

**Andrei Robachevsky (independent)**

---

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.

**PAUL WILSON (private individual)**

---

### **13.5. Corporate Governance - Strongly Disagree (1)**

un RIR doit avoir la possibilité de recourir aux juridictions régionales ou internationales lorsque la juridiction locale étouffe son fonctionnement

**Nico Tshintu bakajika (ISPA-DRC)**

---

Question 28&29 Corporate Governance An RIR must follow corporate governance procedures consistent with best practices in its jurisdiction. 1- Strongly Disagree I believe that imposing rigid corporate governance procedures based on jurisdictional best practices may not suit all RIRs. Each RIR should have the flexibility to adopt governance models that better address the unique needs of its community.

**Anjan Deka (HDFC)**

---



## 14. 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.

### 14.1. Member-Controlled - Strongly Agree (5)

We should have a fixed minimum of universal requirements defined by ICANN for this.

**Babagana Digima (Nigerian Communications Commission)**

---

Democratic /Fair

**Colwayne Babb (Cable and Wireless)**

---

I am strongly agree with that

**Thierry Nagau (Dauphin Telecom)**

---

diversified membership control

**Aftab Siddiqui (AFTABSIDDIQUI-AU)**

---

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

**Kuo Wu (TWIGF)**

---

I think only the Members should do this.

**Mark Elkins (Posix Systems)**

---

I strongly agree with the principle that the majority of an RIR's governing body must be elected by its Members, and that the governing body must maintain effective control over the RIR. This principle ensures that the RIR is democratically governed, transparent, accountable, and responsive to the needs of its Members. It helps prevent the concentration of power, promotes stability, and fosters trust and legitimacy, which are crucial for the RIR's continued success and effectiveness in managing internet resources.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

Members should be main beneficiaries.

**Russell Woruba (PNG Department of ICT)**

---

It makes sense

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

This openness reassures stakeholders and enables members to make informed decisions  
**Andres Murcia (Xiaomi)**

---

Better: "All of the RIRs governing body..."  
**Wolfgang Tremmel (Private Citizen)**

---

Those chosen must belong to countries as diversely distributed in the coverage region as possible.  
**Lia Solis (personal)**

---

certainly the majority of the members  
**Saul Stein (eNetworks)**

---

Agree- this is an important point.  
**Andrew Gallo (The George Washington University)**

---

simple agreement  
**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

Good wording!  
**Sander Steffann (SJM Steffann Consultancy)**

---

## **14.2. Member-Controlled - Somewhat Agree (4)**

Glad it says 'majority' as there is a good case to allow scope for nomcom appointed directors to add depth / skills etc.  
**Jordan Carter (auDA)**

---

**Kelvin Horng Woei Ong (Propnex)**

Yes, in democracy  
**Funmilayo ADEWUNMI (First Bright Technologies)**

---

supermajority, not majority.  
**William Herrin (Self)**

---

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.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

just how to determine the vote count? member single vote, or vote based on size/number of resources? So money could wag the dog

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

This is important

**John Haydon (Education)**

---

modele transparent

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

perhaps a definition for "effective control" would be helpful?

**Nancy Carter (no affiliation)**

---

Not sure about the 50% Could be more (66%? 90%?)

**Joerg Dorchain (private)**

---

Subject to the supervisory jurisdiction of the applicable courts an RIRs governing body must be freely and fairly elected in the proper course by the RIRs members. If the governing body fails to maintain effective control of the RIR control must rest entirely with the RIRs members through a mechanism such as a general meeting. As soon as practicable a new governing body must be brought into effect and able to maintain effective control over the RIR. RIR governing bodies must be primarily accountable to RIR members and external interference from governments, former members of RIR governing bodies and staff must be resisted.

**Paul Hjul (Crystal Web)**

---

This clause needs to be more specific as to "voting members" of the governing body.

**PAUL WILSON (private individual)**

---

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

**Mike Burns (IPTrading)**

---

### **14.3. Member-Controlled - Neutral (3)**

What this effectively does is give an advantage to the existing arrangements. I am not sure I have an alternative, but as a principle it feels jarring to recognize that, were there to be a concentrated ownership in a region it would become progressively harder to address abuses.

**Andrew Sullivan (N/A)**

---

Requiring a member-elected majority in the governing body could hinder effective decision-making, especially in regions with diverse needs. A more flexible governance model may better address local challenges.

**Noel OUPOH (DATACONNECT AFRICA)**

---

ALL of the governing body must be elected RIR members.

**j heasley (SNI)**

---

Agree

**Hann Jye Ng (MyTeksi Sdn Bhd)**

---

Consistence in terminology would be helpful (e.g. community/resource holders/members). Perhaps "decision majority" (e.g. some decisions can require 2/3 of the votes).

**Andrei Robachevsky (independent)**

---

I think there must be a more clear separation of what is member controlled and what community controlled

**Jordi Palet Martinez (The IPv6 Company)**

---

#### **14.4. Member-Controlled - Somewhat Disagree (2)**

How would you ensure member's control is trustworthy?

**Emma Perrier (AFRINIC Ltd)**

---

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.

**Kevin Meynell (Individual)**

---

#### **14.5. Member-Controlled - Strongly Disagree (1)**

This principle assumes that an RIR has to be a membership organisation in the first place; further, it is unclear how "effective control over the RIR" would co-exist with a policy setting body that is broader than the RIR membership

**Peter Koch (Individual)**

---

The first part of this proposed principle, "majority of an RIR's governing body must be elected by the RIR's members" needs justification and presumes all RIRs must be membership-based organizations. This restriction on organizational structure is unwarranted in a proposed principle for ICP-2. The second part of this proposed principle would mean that all RIRs would NOT be multistakeholder organizations – they would be controlled by a single stakeholder, namely the membership. Whether or not this is appropriate is a matter of opinion but at least historically, there has been numerous assertions in various venues that the RIRs are multistakeholder organizations, so this may have repercussions, at least in the political sphere.

**David Conrad (Layer 9 Technologies)**

---

Question 30&31 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. 1-Strongly Disagree Answer: I believe that requiring a majority of the governing body to be elected by members could impede effective decision-making, particularly in regions with diverse needs. A more flexible governance model might better address local challenges.

**Anjan Deka (HDFC)**

---

## 15. Community-Driven

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

### 15.1. Community-Driven - Strongly Agree (5)

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.

**Mirjam Kühne (RIPE)**

---

Essential.

**Jordan Carter (auDA)**

---

strong control to avoid hijacking of policy process

**Aftab Siddiqui (AFTABSIDDIQUI-AU)**

---

I agree with the principle that **"An RIR must maintain a community-driven policy development process that is open, transparent, neutral, and publicly documented."** This approach is fundamental to ensuring trust, inclusivity, and fairness in Internet resource management. - Openness: Encourages diverse participation, ensuring all stakeholders have an opportunity to contribute and voice their perspectives. - Transparency: Builds trust and accountability by making processes and decisions clear and accessible to the public. - Neutrality: Ensures that policies are developed without bias, focusing solely on the collective interests of the community. - Public Documentation: Preserves institutional knowledge and provides a reference for ongoing governance, helping to maintain consistency and clarity. By adhering to these principles, RIRs uphold the collaborative ethos of Internet governance and ensure policies reflect the needs and priorities of their communities.

**Funmilayo ADEWUNMI (First Bright Technologies)**

---

Who constitutes the community? In afrinic currently it seems the non-running-a-network crowd is drowning out those who are.

**Jaco Kroon (Interexcel World Connection)**

---

Goes without saying

**Mark Elkins (Posix Systems)**

---

I strongly agree that an RIR must maintain a community-driven 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.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

Good idea

**Raymond Mamattah (EGIGFA)**

---

Agreed. Based on these principles.

**Russell Woruba (PNG Department of ICT)**

---

Transparency in governance is key

**Emmanuel Egbe (Nigeria)**

---

Vital for good governance

**John Haydon (Education)**

---

Absolutely

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

The community must have input and also driven by the members

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

recommande

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

ICANN or RIRs, both are responsible for maintaining an open, transparent, neutral, and publicly documented approach for policy development, ensuring that the internet remains accessible and equitable for all. Openness allows any interested individual or organization to participate, contributing diverse insights that help shape fair, inclusive policies. Transparency further builds trust by making the entire decision-making process visible, allowing stakeholders to see the rationale behind each decision. Neutrality ensures that no single group or region dominates, keeping the policy process unbiased and aligned with the global community's needs. Public documentation creates a record of all decisions and discussions, making policy development accountable and traceable. Together, these principles foster an internet governance framework that is fair, reliable, and serves the best interests of a broad, global audience.

**Barkha Manral (Corporate Infotech Pvt Ltd)**

---

Public documentation allows stakeholders to follow decision-making and promotes accountability.

**Andres Murcia (Xiaomi)**

---

and easy to understand with the aim of promoting participation

**Lia Solis (personal)**

---

Vital for transparency.

**Luis Caceres (Corporacion Redexcom C.A.)**

---

Should there be certain core RIR principals and processes that aren't subject to community-driven processes?

**Ron da Silva (Network Technologies Globl)**

---

I think this is required of legitimate stakeholder governance

**Mike Burns (IPTrading)**

---

needs a definition of "community-driven" in practice

**Matthew Cowen (dgtlfutures)**

---

Love the "member controlled" vs "community driven" distinction

**Sander Steffann (SJM Steffann Consultancy)**

---

There must be a mandate for supporting appeals, for example that is not possible in APNIC and must be sorted out.

**Jordi Palet Martinez (The IPv6 Company)**

---

## **15.2. Community-Driven - Somewhat Agree (4)**

The transparency and documentation is good.

**Mandisa Gama (IANET (PTY) LTD)**

---

underscores the importance of community involvement in shaping RIR policies. By emphasizing an open, transparent, neutral, and publicly documented policy development process, it ensures that all stakeholders have the opportunity to participate and contribute to the decision-making process. This promotes inclusivity, fosters a sense of ownership, and ultimately leads to policies that are aligned with the needs and interests of the broader internet community.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

I believe policies should come from within the RIR (localized policies)

**سامي ايت علي ولحسن (المركز الوطني للبحث العلمي و التقني)**

---

"community" needs to be properly defined.

**Paul Hjul (Crystal Web)**

---



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

**PAUL WILSON (private individual)**

---

better with bottom-up added

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

### **15.3. Community-Driven - Neutral (3)**

Agree

**Hann Jye Ng (MyTeksi Sdn Bhd)**

---

Yes

**Pedro Matos (The AM Lawyer)**

---

If the RIR member/governing body decides a technocrat approach is preferable, I see no reason to prevent that. I don't believe any governing doing that but would leave it there.

**David Lamparter (Westnetz w.V.)**

---

consensus-based decision making seems to be important

**Andrei Robachevsky (independent)**

---

The Policies should be developed by resource members.

**Musa Stephen HONLUE (AFRINIC)**

---

### **15.4. Community-Driven - Somewhat Disagree (2)**

While a principle stating that policy development must be open, transparent, neutral, and publicly documented is necessary (depending on how those terms are interpreted), it is not sufficient. The policy development process must also be accountable to the community that the RIR serves and fit for purpose. That is, the policy developed must meet the need that drives its development, and it is the community that makes that determination.

**David Conrad (Layer 9 Technologies)**

---

Full openness might expose sensitive discussions about network security, making it easier for malicious actors to exploit potential vulnerabilities. A more controlled process could help protect critical infrastructure information.

### **15.5. Community-Driven - Strongly Disagree (1)**

Question 32&33 Community-Driven An RIR must maintain a community-driven policy development process that is open, transparent, neutral, and publicly documented. 1- Strongly Disagree I believe that complete openness in the policy development process could risk exposing sensitive discussions related to network security, potentially allowing malicious actors to exploit vulnerabilities. A more controlled approach might better protect critical infrastructure information.

**Anjan Deka (HDFC)**

---

This should be a matter for the RIR concerned. There's no inherent reason why there has to be a community driven process, and in some cases this has led to inconsistencies that have been exploited by number resource registrants. There could just as well be globally or nationally agreed policies - whatever is required for local circumstances.

**Kevin Meynell (Individual)**

---

## 16. Neutrality

---

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

### 16.1. Neutrality - Strongly Agree (5)

Essential to the social license of the system to operate.

**Jordan Carter (auDA)**

---

policies can't neutral all the time. it should be for the good of the community and Internet

**Aftab Siddiqui (AFTABSIDDIQUI-AU)**

---

Any rules based system must be applied consistently to maintain respect for the system. Any departures need to have sound justification.

**Narelle Clark (Internet Association of Australia)**

---

Noting that such neutrality can be influenced by the specific national jurisdiction in which the RIR operates.

**Brian Nisbet (HEAnet CLG)**

---

where you can take money out of the picture, that would be great

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

Of course.

**Mark Elkins (Posix Systems)**

---

I strongly agree that an RIR must operate and apply its policies in a manner that is neutral and consistent. This approach fosters fairness, trust, and transparency, while ensuring the stability and legitimacy of the RIR's operations. It also promotes cooperation, compliance, and long-term sustainability, both within the RIR's community and within the broader global internet governance structure. Neutrality and consistency are fundamental to the RIR's ability to effectively manage internet resources and maintain the confidence of its stakeholders.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

APNIC is operating in this spirit.

**Russell Woruba (PNG Department of ICT)**

---

It should be neutral

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

tres souhaite

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

It fosters equality and ensures that policies are applied fairly

**Andres Murcia (Xiaomi)**

---

I would like the RIR to apply its policies neutral with the exception when there is clear indication that a policy is being abused. Then there should probably be some kind of process to stop people abusing this until the loophole is fixed.

**Sebastian Wiesinger (noris network AG)**

---

...and open

**Wolfgang Tremmel (Private Citizen)**

---

convenient for all multiple stakeholders

**Lia Solis (personal)**

---

No preferences.

**Luis Caceres (Corporacion Redexcom C.A.)**

---

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.

**Paul Hjul (Crystal Web)**

---

Fairness is a hallmark of good governance

**Mike Burns (IPTrading)**

---

Very important. But in the event any action by an RIR is questions, who adjudicates violation of this principle- the NRO or courts with jurisdiction over the RIR?

**Andrew Gallo (The George Washington University)**

---

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

**Leo Vegoda (And Polus LLC)**

---

There is an argument that existing community agreed polices don't always do this.

**Kevin Meynell (Individual)**

---

simple agreement

The audit process must verify this. I can show several cases, where is not happening correctly. PDP is vague or operated by the chairs "in their own way", nobody seems to care, so the audit must be able to receive community inputs to verify the claims.

Jordi Palet Martinez (The IPv6 Company)

---

## 16.2. Neutrality - Somewhat Agree (4)

To ensure fairness

Mandisa Gama (IANET (PTY) LTD)

---

There should be fairness

Funmilayo ADEWUNMI (First Bright Technologies)

---

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.

Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)

---

The neutrality principle is critical but doesn't explicitly address mechanisms for ensuring unbiased policy application

Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))

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An RIR should have the flexibility to ignore or reject DoS style requests, or actions which harm the RIR / community.

Warren Kumari (Auth-Servers)

---

Once again this is vital

John Haydon (Education)

---

## 16.3. Neutrality - Neutral (3)

In reality, since a significant portion of an RIR's funding comes from a small number of large members with substantial resources, it is challenging for an RIR to maintain true neutrality.

Chenyang Gao (NoPKT LLC)

---

#### **16.4. Neutrality - Somewhat Disagree (2)**

As a proposed principle, “neutrality” is too vague and needs context (neutral with respect to what? How is that measured?). Perhaps “An RIR must apply policies in a way that are consistent (policies are applied in the same way in similar situations, creating predictable outcomes), objective (decisions within the policy are based on clear, predefined criteria or evidence, not on emotions, personal biases, or external influence), and impartial (all those impacted by policy are treated equally, without favoritism or discrimination).”

**David Conrad (Layer 9 Technologies)**

---

My comments to the previous item apply here too.

**Andrew Sullivan (N/A)**

---

Requiring an RIR to apply policies in an entirely neutral and consistent way may overlook the diverse and evolving needs of different regions. RIRs should have the flexibility to adapt their policies to address local circumstances, rather than being bound by a rigid, one-size-fits-all approach.

**Noel OUPOH (DATACONNECT AFRICA)**

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#### **16.5. Neutrality - Strongly Disagree (1)**

Question 34&35 Neutrality An RIR must operate and apply its policies in a manner that is neutral and consistent. 1- Strongly Disagree I believe that mandating an RIR to apply policies in a strictly neutral and consistent manner may not account for the diverse and changing needs of various regions. RIRs should be flexible enough to adapt their policies to local circumstances instead of adhering to a rigid, one-size-fits-all approach.

**Anjan Deka (HDFC)**

---

## 17. Transparency

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

### 17.1. Transparency - Strongly Agree (5)

This is essential for demonstrating integrity and trustworthiness.

**Eric Edora (TELUS Communications Inc.)**

---

no compromise on transparency

**Aftab Siddiqui (AFTABSIDDIQUI-AU)**

---

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

**Narelle Clark (Internet Association of Australia)**

---

Including compensation and bids for services.

**j heasley (SNI)**

---

It should add thirty party legal audit statement.

**Kuo Wu (TWIGF)**

---

but what about the underhanded resources of high value? Human nature

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

Of course.

**Mark Elkins (Posix Systems)**

---

I strongly agree that an RIR must maintain and publish comprehensive records of its governance, activities, and finances. Doing so ensures that the RIR operates transparently, ethically, and efficiently, fostering trust, accountability, and stakeholder engagement. It enhances good governance, supports financial responsibility, and encourages participation from all stakeholders. Transparency in these areas is essential for maintaining the legitimacy of the RIR and ensuring its effectiveness in managing internet resources in a fair and responsible manner.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

And subject to an external auditor to be published.

**Russell Woruba (PNG Department of ICT)**

---

It makes sense

**Danjuma bappa ahmed (Wownetworks limited nigeria)**

---

transparency is the key

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

tres souhaiter

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

Enhance accountability and transparency

**Andres Murcia (Xiaomi)**

---

This is a matter where regardless of what level of autonomy RIRs have, they need to operate in the larger ecosystem and cooperate with peer RIRs. Even with member/governing body consensus, it can't get away from this.

**David Lamparter (Westnetz w.V.)**

---

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

**Paul Hjul (Crystal Web)**

---

This should be part of the audit, and RIRs must comply.

**Musa Stephen HONLUE (AFRINIC)**

---

Openness is required for stakeholder governance

**Mike Burns (IPTrading)**

---

Transparency is key.

**Carlos Friaças (FCT\| FCCN)**

---

Yes, but this doesn't fully happen now.

**Kevin Meynell (Individual)**

---

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

**Matthew Cowen (dgtlfutures)**

---



## 17.2. Transparency - Somewhat Agree (4)

To show accountability

**Mandisa Gama (IANET (PTY) LTD)**

---

promotes accountability and trust within the RIR community. By maintaining and publishing comprehensive records, RIRs ensure transparency in their operations, financial activities, and decision-making processes. This allows stakeholders to scrutinize the RIR's activities, identify potential issues, and hold the RIR accountable for its actions. Transparency also fosters public trust and strengthens the RIR's reputation as a reliable and responsible organization.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

Transparency is important

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

---

Vital

**John Haydon (Education)**

---

I guess in this principle "RIR" is referred as to the legal entity or its secretariat, where RIR may include its community. Elaboration should be helpful

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

## 17.3. Transparency - Neutral (3)

## 17.4. Transparency - Somewhat Disagree (2)

As written, this isn't a principle, rather it is a description of how a principle related to transparency could be implemented. In terms of that description, transparency is more than simply maintenance and publication of materials – the published materials must be published in a timely manner, easily accessed, comprehensible by the community, and allow any interested party to understand the organization's governance, activities, and finances. Pragmatically speaking, there will always be confidentiality requirements for some aspects of the operation of any organization, including RIRs. As such, true transparency will almost always require some mechanism for appeal of decisions made by the organization to redact or not release certain records or documents. Perhaps "An RIR must operate with sufficient transparency to ensure its community is able to fully understand its governance, activities, and finances."

**David Conrad (Layer 9 Technologies)**

---

Mandating comprehensive records on governance, activities, and finances is excessive and may divert resources from an RIR's primary responsibilities. RIRs should have the flexibility to determine the level of transparency that suits their regional needs without unnecessary regulatory pressure.

**Noel OUPOH (DATACONNECT AFRICA)**

---

**17.5. Transparency - Strongly Disagree (1)**

Question 36&37 Transparency An RIR must maintain and publish comprehensive records of its governance, activities, and finances. 1- Strongly Disagree I believe that requiring comprehensive records of governance, activities, and finances is excessive and could divert valuable resources from an RIR's primary duties. RIRs should have the flexibility to decide on the level of transparency that best meets their regional needs without undue regulatory burdens.

**Anjan Deka (HDFC)**

---

## 18. 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.

### 18.1. Audit - Strongly Agree (5)

This is essential for demonstrating integrity and trustworthiness

**Eric Edora (TELUS Communications Inc.)**

---

ICANN should partake in some of this oversight functions.

**Babagana Digima (Nigerian Communications Commission)**

---

Agree because this project is very important for the future

**Thierry Nagau (Dauphin Telecom)**

---

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

**Brian Longwe (Converged Technology Networks)**

---

It is essential that RIRs are verifiably and measurably compliant with good practice.

**Narelle Clark (Internet Association of Australia)**

---

Financial, IR operations, and service quality.

**j heasley (SNI)**

---

Who is the auditor? What means regular?

**Tahar Schaa (Neuland@Homeland)**

---

I strongly agree that an RIR must participate in regular audits by an external and independent auditor to ensure that it is continuing to comply with ICP-2. External audits are crucial for maintaining transparency, accountability, and financial integrity, and they ensure that the RIR operates in alignment with its responsibilities. These audits also provide valuable insights into improving operations and managing risks, while fostering trust with stakeholders and maintaining the RIR's credibility and effectiveness. Regular audits are a vital component of good governance and help ensure the long-term sustainability and success of the RIR.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

in order to ensure things are done in accordance with the laid down rules and regulation, audit must be carried out

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

pour une bonne gouvernance

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

implementation and consistency for this principle may be challenging.

**Nancy Carter (no affiliation)**

---

Ensure transparency and compliance with applicable regulations

**Andres Murcia (Xiaomi)**

---

Since these rules are the basis of cross-RIR interaction, they need to be validated. Rules/agreements without validation or enforcement are worthless.

**David Lamparter (Westnetz w.V.)**

---

Every action to keep transparency is welcome.

**Luis Caceres (Corporacion Redexcom C.A.)**

---

Audits by appropriately qualified independent persons in various fields requiring independent audit is strongly needed. All of the RIRs need independent counsel to audit the operation of their legal and corporate governance practices and this should be done every 5 years. Technical audits of the databases need to be done - and if they were part of the ecosystem the theft by Ernest at Afrinic would not have been possible.

**Paul Hjul (Crystal Web)**

---

I'd like this to be time-specific. "Every five years" is regular, but is it enough?

**Lee Howard (IPv4.Global by Hilco Streambank)**

---

Also, Community audit should be considered

**Hernan Arcidiacono (IPLAN)**

---

This is unavoidable to maintain the system's health.

**Carlos Friaças (FCT\| FCCN)**

---

This is too much details for ICP-2-bis but I'd want the RIRs to each choose a different auditor and change their auditor every 3-5 years

**Leo Vegoda (And Polus LLC)**

---

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

**Kevin Meynell (Individual)**

---

I naturally expect the details in which how it is to be audited will be defined in the revised ICP-2 or its referral

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

Expect more details in ICP-2bis, but good principle

**Sander Steffann (SJM Steffann Consultancy)**

---

Probably some of my previous inputs belong to here ... not repeating them

**Jordi Palet Martinez (The IPv6 Company)**

---

## **18.2. Audit - Somewhat Agree (4)**

In addition to the principles of transparency and continued community and member review, this principle provides an extra check point.

**Mirjam Kühne (RIPE)**

---

Maintaining compliance

**Mandisa Gama (IANET (PTY) LTD)**

---

RIRs maintain high standards of accountability and transparency. By subjecting themselves to regular audits conducted by independent external auditors, RIRs demonstrate their commitment to compliance with ICP-2 and good governance practices. This helps to identify and address potential issues early on, safeguarding the integrity of the RIR system and promoting public trust in the organization.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

Such audits can be expensive, especially for a smaller/newer RIR, so some leeway should be given for these audits to be less burdensome/frequent for RIRs with an annual revenue below a certain threshold.

**Cameron Smith (Bubble Cloud Mozambique S.A.)**

---

Regular audits must take place

**John Haydon (Education)**

---

Who audits is critical

**Randy Bush (IIJ Research Lab & Arrcus Inc)**

---

### **18.3. Audit - Neutral (3)**

I do not agree that this level of detail is appropriate for a principle

**Peter Koch (Individual)**

---

Without the clear and agreeable definitions I mentioned above, this seems like the opportunity for a lot of vendor manipulation.

**Andrew Sullivan (N/A)**

---

Mandatory audits by an external and independent auditor could impose unnecessary financial and administrative burdens on RIRs, especially those in smaller or emerging regions with limited resources. Such audits may not always be the most effective way to ensure compliance with ICP-2, as they could distract from the RIR's core responsibilities and local needs.

**Noel OUPOH (DATACONNECT AFRICA)**

---

Only if auditor is selected/voted by the RIRs community

**Sergey Kozhedub (IPTP Networks)**

---

Meh. Maybe if there is a problem. Regular audits are expensive.

**Mike Burns (IPTrading)**

---

### **18.4. Audit - Somewhat Disagree (2)**

RIRs must pass audits, not just participate. All negative finding resulting from an audit must be cured withing a reasonable amount of time. Failure to cure the negative findings can result in de-recognition.

**David Conrad (Layer 9 Technologies)**

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### **18.5. Audit - Strongly Disagree (1)**

Question 38&39 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. 1- Strongly Disagree I believe that requiring mandatory audits by an external and independent auditor could place undue financial and administrative burdens on RIRs, particularly those in smaller or emerging regions with limited resources. Such audits may not be the most effective means of ensuring compliance with ICP-2, as they could detract from the RIR's core responsibilities and local needs.



## 19. 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.

### 19.1. Service - Strongly Agree (5)

If an RIR can't do this it can't be an RIR.

**Jordan Carter (auDA)**

---

and above all based on security and compliance

**Thierry Nagau (Dauphin Telecom)**

---

services should be audited by community oversight

**Aftab Siddiqui (AFTABSIDDIQUI-AU)**

---

I strongly support the principle that an RIR must provide stable, reliable, secure, accurate, and accountable allocation, registration, and directory services, using standard protocols for cross-RIR compatibility. These elements are fundamental to the proper functioning of the global internet infrastructure, ensuring smooth coordination, security, transparency, and sustainability. For the global internet system to thrive, RIRs must uphold these standards, guaranteeing that resources are distributed and managed efficiently and securely across regions.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

A chief technical officer or scientist is to be recruited by each RIR as a member of its management.

**Russell Woruba (PNG Department of ICT)**

---

souhaiter

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

Using standard protocols and ensuring cross-RIR compatibility guarantees seamless communication

**Andres Murcia (Xiaomi)**

---

RIRs must avoid entrusting decision making on non-technical issues to staff claiming technical skills.

**Paul Hjul (Crystal Web)**

---

And the NRO should define a baseline standard by which these services can be evaluated. And failing to comply should trigger decay of accreditation.

**Musa Stephen HONLUE (AFRINIC)**



---

this add complexity to existing RIRs, however this would be the only way to handle a de-registration. This would require the basic service catalogue for all RIRs to be defined

**Saul Stein (eNetworks)**

---

Yes, their raison d'etre

**Mike Burns (IPTrading)**

---

Well yes...

**Kevin Meynell (Individual)**

---

further elaboration is possible is good as principle

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

## **19.2. Service - Somewhat Agree (4)**

outlines the core responsibilities of an RIR in providing essential services to the internet community. By ensuring the stability, reliability, security, accuracy, and accountability of its services, RIRs contribute to the overall health and functionality of the internet. The use of standard protocols and specifications for cross-RIR compatibility promotes interoperability and seamless operation of the global internet numbering system. This principle underscores the critical role of RIRs in maintaining a robust and resilient internet infrastructure.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

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

**Randy Bush (IIJ Research Lab & Arrcus Inc)**

---

## **19.3. Service - Neutral (3)**

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

**Peter Koch (Individual)**

---

Requiring an RIR to meet such strict standards for stability, reliability, and cross-RIR compatibility is unrealistic and overly restrictive. Different regions face varying challenges, and imposing these high

expectations could force RIRs to divert resources from addressing more pressing local needs. Rigid global standards ignore unique regional challenges.

**Noel OUPOH (DATACONNECT AFRICA)**

---

#### **19.4. Service - Somewhat Disagree (2)**

#### **19.5. Service - Strongly Disagree (1)**

What services are provided shouldn't be in the set of principles since they'll vary over time and the intent of principles is to provide general guidance, not explicit implementation details. In that context, the set of services provided by the RIR should be specified by the community and the performance of those services must conform to a set of service level expectations specified by its community. Generally speaking, the use of standard protocols and requirements for compatibility are an implementation detail, more related to continuity, than a principle.

**David Conrad (Layer 9 Technologies)**

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Question 40&41 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. 1- Strongly Disagree I believe that requiring an RIR to adhere to such stringent standards for stability, reliability, and cross-RIR compatibility is unrealistic and overly demanding. Different regions encounter unique challenges, and imposing these high expectations could lead RIRs to divert resources from more pressing local needs. The emphasis should be on regional relevance and flexibility rather than strict adherence to uniform global standards.

**Anjan Deka (HDFC)**

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## 20. Continuity

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An RIR must maintain continuity procedures and redundancies and participate in record sharing that would enable another RIR to perform its RIR services, if necessary.

### 20.1. Continuity - Strongly Agree (5)

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

**Eric Edora (TELUS Communications Inc.)**

---

Yes, this is the basis of complementarity.

**Thierry Nagau (Dauphin Telecom)**

---

fail-over and redundancy, this is a good and valid stance.

**Jaco Kroon (Interexcel World Connection)**

---

I strongly agree with the principle that an RIR must maintain continuity procedures and redundancies and participate in record sharing to ensure that another RIR can perform its services if necessary. These measures are essential for maintaining the stability, reliability, and security of the global internet infrastructure. They foster a collaborative and transparent environment that ensures uninterrupted service delivery, even in the event of unforeseen challenges, thereby enhancing the resilience of the global IP address allocation and registration system. This principle promotes global coordination, trust, and accountability, which are vital to the continued operation of the global internet ecosystem.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

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.

**Douglas Camin (Coordinated Care Services, Inc.)**

---

Agreed, as in terms of escrow or embassy for it.

**Russell Woruba (PNG Department of ICT)**

---

possibilité envisageable

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

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

**Andres Murcia (Xiaomi)**

---

Ensure interoperability

**Lia Solis (personal)**

---

Member data belongs to the member. RIRs should not assume ownership of records.

**Paul Hjul (Crystal Web)**

---

Not sure "an other" is right; it might be "other RIRs"

**Lee Howard (IPv4.Global by Hilco Streambank)**

---

Once again this cuts against the principal of RIR independence. But advisable to do this.

**Mike Burns (IPTrading)**

---

This is very important, as we've seen a RIR under heavy attack from one of its members.

**Carlos Friaças (FCT\FCCN)**

---

This is all well and good but this principle must be accompanied by a separate document or website describing how the RIRs would support the technical functionality and staff support requirements. Sharing records and documenting processes is fine but it's important to know that they are tested in tabletop and live exercises often enough that they could be activated with minimal delay, should they be needed

**Leo Vegoda (And Polus LLC)**

---

There is a strong argument for a centrally operated registry (with multiple redundancies) here.

**Kevin Meynell (Individual)**

---

not for the text: it would be a big project to implement this in all existing RIRs.

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

## **20.2. Continuity - Somewhat Agree (4)**

It seems there is an obvious problem with this principle, which is circularity: if an RIR refuses, what can you do? Kick them out of the ASO? In that case, they get what they wanted anyway.

**Andrew Sullivan (N/A)**

---

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

**Jordan Carter (auDA)**

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See extended comments on the NANOG thread starting at <https://mailman.nanog.org/pipermail/nanog/2024-November/226586.html>

**William Herrin (Self)**

---

the resilience and continuity of internet number resource services. By maintaining robust continuity procedures and redundancies, RIRs can mitigate the impact of potential disruptions or failures. Additionally, participation in record sharing enables other RIRs to take over essential services if necessary, safeguarding the stability and reliability of the global internet numbering system. This principle promotes a collaborative approach among RIRs and strengthens the overall resilience of the internet infrastructure.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

Very important for ensuring service continuity

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

---

Transparency is important

**John Haydon (Education)**

---

### **20.3. Continuity - Neutral (3)**

### **20.4. Continuity - Somewhat Disagree (2)**

the goal of supporting succession is laudable, again the level of detail is problematic; record sharing could be read as prescribing inter-RIR action, where a different form of escrow might be more appropriate

**Peter Koch (Individual)**

---

No, again, this just adds more burdens on RIRs, and breaches the confidentiality of each RIR. There must be no imposing on RIRs to share their records with other RIRs.

**Noel OUPOH (DATACONNECT AFRICA)**

---

### **20.5. Continuity - Strongly Disagree (1)**

As a principle, this is probably better entitled "Assumption of Service", rather than "Continuity." It is specifying one particular mechanism (among many) by which continuity of service/functionality can be provided, i.e., another RIR takes over the service. This can be problematic, e.g., what happens when

an RIR that has a “discontinuity event” offers a service not provided by the assuming RIR? Presumably, the intent here is that there is a base set of services (which would need to be defined) that could be assumed. As a principle, this could probably be stated as: “An RIR must ensure that [base services] can be assumed by another RIR without significant service interruption if necessary.” Separately, having a principle of “Continuity” would also be good, but it is different/more general than assumption of service, e.g.: “An RIR must ensure continuity of services and functionalities it provides to its community.” As an aside, experience in the ICANN context of assumption of service has shown that is far, far easier said than done and requires extensive and explicit specification and frequent, comprehensive testing.

**David Conrad (Layer 9 Technologies)**

---

Question 42&43 Continuity An RIR must maintain continuity procedures and redundancies and participate in record sharing that would enable another RIR to perform its RIR services, if necessary 1-Strongly Disagree I believe that requiring RIRs to maintain continuity procedures and participate in record sharing imposes unnecessary burdens and compromises their confidentiality. There should be no obligation for RIRs to share their records with one another.

**Anjan Deka (HDFC)**

---

## 21. Anti-Capture

---

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

### 21.1. Anti-Capture - Strongly Agree (5)

Lax governance is not an option in today's registry system to defend off a number of problems including capture.

**Eric Edora (TELUS Communications Inc.)**

---

In case, an RIR is deemed or determined to have been captured, then ICANN has to step in a way and manner that will restore the independence of the RIR.

**Babagana Digima (Nigerian Communications Commission)**

---

Australia is fully supportive of rules and controls being put in place to prevent the capture of an RIR. However, it is important that any rules and controls established at the global or regional level clearly define what capture entails. A vague anti-capture principle may be open to abuse by a bad-faith actor, who is interested in shutting down and/or replacing an RIR. The ASO AC may want to consider how other organisations implement anti-capture governance rules and draw inspiration from examples which have been proven to be effective.

**Ian Sheldon (Australian Government - Department of Infrastructure, Transport, Regional Development, Communications and the Arts)**

---

define "captured", what are we protecting against?

**Darrell Budic (OHG Networks, LLC)**

---

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

**Mirjam Kühne (RIPE)**

---

Perhaps some guidelines should be developed on this? Especially in light of recent attempts to influence and/or gain control of RIR by private entities

**Brian Longwe (Converged Technology Networks)**

---

An RIR alone cannot ensure anti- capture. ICANN needs to step in and provide help and assistance.

**Emma Perrier (AFRINIC Ltd)**

---

strong policies in place to avoid that

**Aftab Siddiqui (AFTABSIDDIQI-AU)**

---

"captured"? What does that mean?

**j heasley (SNI)**

---

What's the definition of captured here?

**Jaco Kroon (Interexcel World Connection)**

---

A clear definition of "captured" should be included in the policy.

**Cameron Smith (Bubble Cloud Mozambique S.A.)**

---

Enhance effective legal statement and workable statements

**Kuo Wu (TWIGF)**

---

I agree... BUT how to protect a non-profit against profiteers with deeper pockets than the rest of the RIRs & ICANN combined?

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

---

I strongly agree with the principle that an RIR must maintain governance rules and controls to prevent itself from becoming captured. These rules and controls are critical for preserving the integrity, independence, and credibility of the RIR, enabling it to serve the interests of the global community impartially. Ensuring that RIRs are not captured by any particular group or external pressure fosters trust, accountability, and sustainability in the management of critical internet resources. Such governance mechanisms ensure that the RIR remains focused on its mission to support the global public good, protect the interests of all stakeholders, and contribute to the long-term health of the internet infrastructure.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

---

This is perfect 🙌

**Raymond Mamattah (EGIGFA)**

---

Agreed. Consider the case of preventing AfriNIC's operation.

**Russell Woruba (PNG Department of ICT)**

---

This is vital

**Warren Kumari (Auth-Servers)**

---

All rules must be adhere to

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

a definition may be helpful

**Nancy Carter (no affiliation)**

---



I believe this is one of the core requirement.

**Jeff Neuman (JJN Solutions, LLC)**

---

Strong governance controls help safeguard against conflicts of interest and ensure that the RIR remains focused

**Andres Murcia (Xiaomi)**

---

Guarantee community participation without risking the interests of members in their different natures

**Lia Solis (personal)**

---

Identified mechanisms of capture including a "council of elders" and over entrustment in an employee as practiced in APNIC must be prohibited by the ICP-2 specifications.

**Paul Hjul (Crystal Web)**

---

I can't agree more, considering what AFRINIC is faced with.

**Musa Stephen HONLUE (AFRINIC)**

---

What is mean to be captured ?

**Adeola Alain P. AINA (Digital Intelligence Services, Sarl)**

---

This seems difficult to enforce, but a great principle to strive for.

**Xavier Clark (Harris Computer)**

---

With the IPv4 market, there is a new incentive for capture and the smallness of the voting populations make this a real risk

**Mike Burns (IPTrading)**

---

While i fully agree i also know that "becoming captured" also heavily depends on external threats.

**Carlos Friaças (FCT\| FCCN)**

---

Nearly impossible to implement in practice, although independent directors and a higher level regulator would limit the possibilities.

**Kevin Meynell (Individual)**

---

Good addition reflecting the effort until now

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

---

capture definition required here.

**Matthew Cowen (dgtlfutures)**

---

Maybe combine this with "member controlled". With that in place, the remaining thing is that a subgroup of members can't take over control. Preventing large-scale discrimination between groups of members is important

**Sander Steffann (SJM Steffann Consultancy)**

---

## **21.2. Anti-Capture - Somewhat Agree (4)**

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

**Jordan Carter (auDA)**

---

'Capture' needs more definition here. I can infer a meaning but more precision would be helpful.

**Narelle Clark (Internet Association of Australia)**

---

safeguards the independence and objectivity of RIRs. By implementing robust governance rules and controls, RIRs can protect themselves from undue influence or capture by external entities, ensuring that their decisions are driven by the best interests of the internet community. This principle promotes transparency, accountability, and the long-term sustainability of the RIR system.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

---

souhaïter

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

This can be culturally difficult.

**Randy Bush (IJJ Research Lab & Arrcus Inc)**

---

I agree, but I'm struggling with how this would be operationalized and judged.

**Andrew Gallo (The George Washington University)**

---

Need a clear definition of "capture"

**Sébastien Brossier (Neutral Network Lab)**

---

## **21.3. Anti-Capture - Neutral (3)**

I don't know what "captured" means; in one reading, being overwhelmingly dominated by members who are number resource holders would be a kind of "capture".

**Andrew Sullivan (N/A)**

---

Not really, there should be no higher power controlling RIRs as the system has to be decentralized.

**Noel OUPOH (DATACONNECT AFRICA)**

---

Needs better definition.

**William Herrin (Self)**

---

This should be related to neutrality only.

**Sergey Kozhedub (IPTP Networks)**

---

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.

**Lee Howard (IPv4.Global by Hilco Streambank)**

---

#### **21.4. Anti-Capture - Somewhat Disagree (2)**

again, this should already be covered by adhering to "good governance" principles

**Peter Koch (Individual)**

---

While conceptually, anti-capture is laudable as a proposed principle, the questions it begs are "captured by whom?" and "how can you objectively tell?". For example, one could argue that the existing RIRs have already been "captured" by their members. Perhaps restating this proposed principle to something like: "An RIR must maintain governance rules and controls to prevent a loss of community control of the RIR."

**David Conrad (Layer 9 Technologies)**

---

Here we are again, Definition of 'capture' as it regards an RIR? I have not seen any such definition of capture.

**James Laferriere (n/a)**

---

#### **21.5. Anti-Capture - Strongly Disagree (1)**

Question 44&45 Anti-Capture An RIR must maintain governance rules and controls to prevent itself from becoming captured. 1- Strongly Disagree I believe that imposing higher governance rules and

controls on RIRs is unnecessary since the system should remain decentralized. There should be no overarching authority that could lead to capture.

**Anjan Deka (HDFC)**

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## 22. Ecosystem Stability

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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.

### 22.1. Ecosystem Stability - Strongly Agree (5)

What happens if it fails to operate in the expected manner?

**Babagana Digima (Nigerian Communications Commission)**

---

Forcing attention to the global system is vital. Otherwise people (RIRs) risk retreating into their silos. This also provides the principled basis for assigning resources to effective coordination and collaboration, which I see as positive not only for the numbering community, but also having positive spill-over effects for the internet infrastructure technical community more broadly.

**Jordan Carter (auDA)**

---

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

**Narelle Clark (Internet Association of Australia)**

---

Of course. Or, we should withdraw its authority

**Kuo Wu (TWIGF)**

---

It sounds great, until you have human nature and greed ;(

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

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I strongly agree that 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. Cooperation between RIRs is not just a practical necessity but an ethical and strategic imperative for the long-term health and success of the global Internet ecosystem. By working together, RIRs can ensure consistency, avoid fragmentation, enhance security, and address the global challenges that affect the Internet as a whole. Collaboration ensures that the global Internet remains stable, secure, and equitable for all users.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

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This principle emphasizes the importance of collaboration among Regional Internet Registries (RIRs) to maintain the stability and functionality of the global Internet number registry system. **Cooperation and Coordination:** The principle underscores the necessity for RIRs to work together. This cooperation ensures that the allocation and management of IP addresses and Autonomous System Numbers (ASNs) are consistent and reliable across different regions. **Stability of the Internet:** By adhering to this principle, RIRs contribute to the overall stability of the Internet. Any action or inaction that could disrupt the registry system might have far-reaching consequences, affecting not just regional but global Internet operations. **Responsibility and Accountability:** The principle implies a shared

responsibility among RIRs. Each RIR must be accountable for its actions and ensure that its operations do not jeopardize the stability of the global system. Preventing Fragmentation: Cooperation helps prevent fragmentation of the Internet number registry system. A fragmented system could lead to inconsistencies and conflicts in IP address allocation, which could disrupt Internet connectivity and operations. Global Impact: The principle highlights that the actions of individual RIRs have global implications. Therefore, maintaining a collaborative approach is crucial for the health and stability of the entire Internet ecosystem. This principle is fundamental to ensuring that the Internet remains a stable and reliable resource for users worldwide. It promotes a unified approach to managing critical Internet resources, which is essential for the continued growth and functionality of the global Internet.

**Benny Pan (NA)**

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Single global internet is essential

**Russell Woruba (PNG Department of ICT)**

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RIR must ensure its Ecosystem is stably, reliable and efficient to members

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

bonne approche

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

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

**Andres Murcia (Xiaomi)**

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This is the core purpose of a RIR.

**David Lamparter (Westnetz w.V.)**

---

...and security of the global ...

**Andrei Robachevsky (independent)**

---

RIRs collectively must account to members of RIRs to maintain the global Internet systems. RIRs must not - as they have been - support corrupt activities by the purported leadership of an RIR at the expense of the resource members of the RIR.

**Paul Hjul (Crystal Web)**

---

I suggest to reword the text as following: All RIRs must cooperate to ensure the ongoing operation and stability of the global Internet number registry system and each RIR must not operate or fail to operate any manner that threatens such stability.

**Haitham El Nakhal (National Telecom Regulatory Authority)**

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Well yes, but difficult to evaluate in practice.

**Kevin Meynell (Individual)**

---

good addition

Akinori MAEMURA (JPNIC - Japan Network Information Center)

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## 22.2. Ecosystem Stability - Somewhat Agree (4)

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

Andrew Sullivan (N/A)

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collective responsibility of all RIRs to maintain the stability and security of the global internet numbering system. By cooperating and avoiding actions that could jeopardize this stability, RIRs contribute to the overall health and resilience of the internet. This principle promotes a collaborative approach among RIRs, fostering a sense of shared responsibility and ensuring the long-term sustainability of the internet infrastructure.

Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)

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I'm a bit concerned about the governance of this cooperation.

Mike Burns (IPTrading)

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It's a bit vague. What if a part of that registry system goes off the rails. To what extent does an RIR have to go against its own principles? I feel that this principle assumes that the system consists of "the good guys/girls/people"

Sander Steffann (SJM Steffann Consultancy)

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## 22.3. Ecosystem Stability - Neutral (3)

this is not necessarily a principle on its own but a corollary from both the Ecosystem and the Lifecycle principles

Peter Koch (Individual)

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yes

Funmilayo ADEWUNMI (First Bright Technologies)

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## 22.4. Ecosystem Stability - Somewhat Disagree (2)

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.

**David Conrad (Layer 9 Technologies)**

---

RIRs must be independent and not overlap or have negative impact on each other. Imposing a global standard for cooperation risks overburdening RIRs with obligations that may not be feasible or relevant to their specific regional contexts.

**Noel OUPOH (DATACONNECT AFRICA)**

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## **22.5. Ecosystem Stability - Strongly Disagree (1)**

Question 46&47 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. 1- Strongly Disagree I disagree with this requirement. RIRs should maintain their independence and avoid overlapping responsibilities that could negatively impact one another. Imposing a global standard for cooperation could burden RIRs with obligations that may not be relevant to their regional contexts.

**Anjan Deka (HDFC)**

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## 23. Remedial Bias

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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.

### 23.1. Remedial Bias - Strongly Agree (5)

This principle buttresses the principle of ecosystem stability.

**Eric Edora (TELUS Communications Inc.)**

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The broader community should assist if any RIR is at risk of failure.

**Narelle Clark (Internet Association of Australia)**

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I strongly support the principle that ICANN and all other RIRs should provide reasonable support to assist an RIR to cure any failure to comply with ICP-2 before considering derecognition. This approach allows for cooperation, ensures the stability and growth of the global system, promotes fairness and accountability, and reinforces the importance of long-term, sustainable compliance. By prioritizing support over punitive measures, the RIR ecosystem as a whole will remain stronger and more resilient, contributing to the ongoing stability of the global Internet infrastructure.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

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Excellent

**Raymond Mamattah (EGIGFA)**

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Discussion and remediation is essential

**Russell Woruba (PNG Department of ICT)**

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RIR must from time to time secure and require support from other members in ICANN and RIR before such derecognizing must occurred

**Rasheed Shittu (STL FIBERCO LIMITED)**

---

coordination

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

---

It allows an RIR to correct any failures and avoid potentially disruptive actions.

**Andres Murcia (Xiaomi)**

---

Unfortunately and to my humble opinion, it is not the case as of now.

**Musa Stephen HONLUE (AFRINIC)**

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I've never seen the phrase "remedial bias" before, and searching "what is 'remedial bias'" was not helpful.

**Lee Howard (IPv4.Global by Hilco Streambank)**

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Derecognition should be the last step

**Mike Burns (IPTrading)**

---

Clearly desirable and reasonable.

**Andrew Gallo (The George Washington University)**

---

Provision in the document needs to be made to force the failed RIR to allow such interventions with a failsafe mechanism to cut operations in the case of failure to comply after a vote by all RIRs (4 currently, so no overall majority, so a quorum member needs to be added - ICANN?)

**Matthew Cowen (dgtlfutures)**

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'+1: Fixing is more important than derecognition

**Sander Steffann (SJM Steffann Consultancy)**

---

There must be some concrete timing for failure corrections and derecognition. Also what happens if the a derecognized RIR ignores it?

**Jordi Palet Martinez (The IPv6 Company)**

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## **23.2. Remedial Bias - Somewhat Agree (4)**

Broadly agree. Situation where an RIR goes intentionally 'off the reservation' may need a different approach.

**Jordan Carter (auDA)**

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It really depends on the mode of failure, sometimes it's just better to burn it down and start over.

**Jaco Kroon (Interexcel World Connection)**

---

a commitment to collaboration and support within the RIR community. By providing reasonable assistance to RIRs facing compliance issues, ICANN and other RIRs can help to prevent unnecessary derecognitions. This collaborative approach fosters a supportive environment and strengthens the overall resilience of the RIR system. It also aligns with the principle of ensuring the stability and continuity of internet number resource services.

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

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If the failure is due to conditions beyond the RIR's control, yes other RIRs should provide support. If it is due to a deliberate attitude or negligence by the RIR's management team, the RIR's should not provide support.

**Cameron Smith (Bubble Cloud Mozambique S.A.)**

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A principle emphasizing collaborative remediation with clear timelines might strengthen this  
**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

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What about an RIR that doesn't ask, but hand been "captured"?  
**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

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The principle that ICANN and all other Regional Internet Registries (RIRs) must provide reasonable support to assist an RIR in curing any failure to comply with ICP-2 before derecognizing the RIR seems to emphasize collaboration and support within the internet governance community. This approach can be seen as beneficial for several reasons: Promotes Stability: Ensuring that RIRs receive support to address compliance issues can help maintain stability in the management of internet resources. This is crucial for the smooth functioning of the internet. Encourages Cooperation: This principle fosters a cooperative environment where RIRs can rely on each other for assistance, promoting a sense of community and shared responsibility. Prevents Disruption: By providing support before taking drastic measures like derecognition, the principle aims to prevent disruptions that could arise from the sudden loss of an RIR's recognition. Ensures Fairness: Offering support to cure compliance failures ensures that RIRs are given a fair chance to rectify issues, which can be seen as a just and equitable approach. However, the effectiveness of this principle would depend on the implementation and the willingness of all parties involved to provide and accept support in good faith. Also we need to consider each RIR is independent in the current system.

**Benny Pan (NA)**

---

Reasonable support will need to be very strongly defined. Potentially every request for support will be decided on by each RIR's community?

**Xavier Clark (Harris Computer)**

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I need to leave it to native English speaker after all, but I think there should be better wording than "Remedial Bias" than representing the principle as stipulated

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

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### **23.3. Remedial Bias - Neutral (3)**

solidarity and subsidiarity are important aspects, but this principle involves the judge as a supporter  
**Peter Koch (Individual)**

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Given the earlier veto, "all reasonable support" strikes me as a potential way to trip.

**Andrew Sullivan (N/A)**

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There is no need in other entities to intervene in RIRs' internal operations, that should remain within the RIR's responsibility. This approach risks enabling RIRs to rely on external assistance instead of addressing issues independently, and may lead to unnecessary interference

**Noel OUPOH (DATACONNECT AFRICA)**

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there should be fairness

**Funmilayo ADEWUNMI (First Bright Technologies)**

---

No other RIR or ICANN should be responsible for fixing or aiding another RIR. Let them fail; it is ok for them to fail.

**j heasley (SNI)**

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There is no time boundary here. Reasonable Support should also be time bound depending on the situation and that should be noted here.

**Terry Manderson (terrym.net pty ltd)**

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In practice, this has been a failure so not sure what is expected to change in future without significant changes to the existing governance structures.

**Kevin Meynell (Individual)**

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#### **23.4. Remedial Bias - Somewhat Disagree (2)**

Another laudable proposed principle that attempts to encourage cooperation and mutual support among the RIRs, but it raises the question of what would be considered "reasonable" and who would judge whether that definition of "reasonable" actually is. This matters given the risk of de-certification if the RIR from whom the support is being requested declines to provide that support. Pragmatically, it is unclear how this proposed principle would be applied in practice. For example, assume an RIR is about to go bankrupt due to malfeasance, thereby failing the "financial stability" principle and risking de-recognition. Would one or more other RIRs be required to fund the failing RIR or risk de-recognition themselves? Would the membership of the funding RIR(s) feel this is an appropriate use of the RIR's funding, particularly when the services of the failing RIR can be assumed by a more stable RIR? Wouldn't this support call into question whether the RIR being supported meets the "independent" principle? It is also interesting that ICANN is explicitly mentioned here, given the current (lack of) role of ICANN in relation to the RIRs and the rationale the RIRs provide for providing funding to ICANN. What would be the repercussions should the ICANN community choose not to provide support?

**David Conrad (Layer 9 Technologies)**

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Other RIRs may have no resource for this, to comply with such rule they will require "special" fund for this in their budget, which is the community's money. What if more than one RIRs fails to comply?

### **23.5. Remedial Bias - Strongly Disagree (1)**

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 its 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”.

**Alban Kwan (CSC)**

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Question 48&49 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. 1-Strongly Disagree I believe that external entities should not intervene in the internal operations of RIRs. Each RIR should take responsibility for its compliance with ICP-2. Relying on outside assistance could hinder independent problem-solving and lead to unnecessary interference.

**Anjan Deka (HDFC)**

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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 requires. A better principle is: Prior to derognition 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.

**Paul Hjul (Crystal Web)**

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Why is ICANN 1st listed here ? Also, the parties involved in the decision to derecognise should not be mandate to provide support or assistance...

**Adeola Alain P. AINA (Digital Intelligence Services, Sarl)**

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## 24. Handoff

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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.

### 24.1. Handoff - Strongly Agree (5)

It is imperative that RIRs - even in the event of some kind of failure - must be cooperative within the global system, to support the overall health of the global system.

**Eric Edora (TELUS Communications Inc.)**

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We need to define the items or resources that must be handed over.

**Babagana Digima (Nigerian Communications Commission)**

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Yes but I don't know how you can enforce this when they are going to quit anyway. If they don't cooperate, what can icann do? Derecognized them? A more practical terms would be to allow ICANN to takeover management in cooperation with other RIR if they are non-cooperative during transition. This would create the policy framework needed to ensure smooth transfer.

**Alban Kwan (CSC)**

---

Agree, but how can this be achieved in practice? Looking forward to seeing how that happens in the next part of the policy development.

**Jordan Carter (auDA)**

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this should be legally binding

**Aftab Siddiqui (AFTABSIDDIQUI-AU)**

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Derecognition is worst case, so ICANN role is ok

**Tahar Schaa (Neuland@Homeland)**

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This may need to be implemented in a forcible manner in case where the legal RIR entity does not want to comply and all remedial options have been exhausted.

**Jaco Kroon (Interexcel World Connection)**

---

I strongly support the principle that a derecognized RIR must cooperate with ICANN and other RIRs to ensure the smooth transfer of its operations. This principle ensures that there is continuity of services, regional stability, and global integrity in the Internet number registry system. By fostering cooperation and transparency, the process ensures that the transition to a successor entity is seamless, protects stakeholders, and upholds the reputation of the global RIR ecosystem.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

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This principle emphasizes the importance of collaboration and responsibility in the event of a Regional Internet Registry (RIR) being derecognized. Here are some key points to consider: Ensuring Continuity: The principle ensures that the operations of a derecognized RIR are smoothly transferred to a successor or interim entity. This is crucial to maintain the stability and reliability of internet resource management. Collaboration with ICANN and Other RIRs: Cooperation with ICANN (Internet Corporation for Assigned Names and Numbers) and other RIRs is essential. This collaboration helps in the seamless transition of responsibilities and minimizes any potential disruptions in the management of internet resources. Responsibility and Accountability: The principle holds the derecognized RIR accountable for cooperating in the transition process. This accountability ensures that the RIR fulfills its obligations even in the event of derecognition. Designated Successor or Interim Entity: The involvement of a designated successor or interim entity ensures that there is a clear plan and structure in place for the transition. This helps in avoiding any confusion or gaps in the management of internet resources. Overall, this principle is designed to safeguard the integrity and stability of internet resource management by ensuring a well-coordinated and responsible transition process.

**Benny Pan (NA)**

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Current case of AfriNIC not have any member on the SOA and NRO EC.

**Russell Woruba (PNG Department of ICT)**

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It's very unclear how this could be enforced, but sure.

**Warren Kumari (Auth-Servers)**

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I agree

**Umar Abdullahi (Friends Wireless Ltd)**

---

souhaite

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

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It helps ensure that any functions, services, and data are smoothly handed over to the successor

**Andres Murcia (Xiaomi)**

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Save that the decision to derecognize an RIR must be undertaken with due process and the to be derecognize RIR must have a right of judicial review in an appropriate jurisdiction the principle of handoff is imperative.

**Paul Hjul (Crystal Web)**

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Hopefully this would happen

**Mike Burns (IPTrading)**

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In my opinion, a provision to change jurisdiction of a derecognized RIR might also be helpful.

**Carlos Friaças (FCT| FCCN)**

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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.

**Leo Vegoda (And Polus LLC)**

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Again, difficult to elicit cooperation from a dysfunctional RIR in practice.

**Kevin Meynell (Individual)**

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see previous answer

**Matthew Cowen (dgtlfutures)**

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How we ensure this?

**Jordi Palet Martinez (The IPv6 Company)**

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## **24.2. Handoff - Somewhat Agree (4)**

smooth and orderly transition in the event of an RIR's derecognition. By requiring the derecognized RIR to cooperate with ICANN and other RIRs, it minimizes disruption to internet number resource services and safeguards the stability of the global internet numbering system. This principle promotes a collaborative approach and demonstrates a commitment to maintaining the integrity of the RIR ecosystem

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

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yeah... tell that to the guys who's income streams had been cut off by this derecognition decision... they'll fight you, even though we would agree they should assist

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

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I agree here, but given that this could be implemented or judged, especially if derecognition is adversarial or involved with a legal dispute, which may limit actions and information sharing. Clearly a tough position. As a principle, this absolutely make sense. How it will work in practice is hard to imagine.

**Andrew Gallo (The George Washington University)**

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I need to leave it to native English speaker after all, but I think there should be better wording than "Handoff" than representing the principle as stipulated

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

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### **24.3. Handoff - Neutral (3)**

this is probably more an expectation than a principle, at least to the extent that it assumes the derecognized entity remains capable of acting. Also, support for succession was already covered under Operation - and finally, there is no remedy if a derecognized entity would not comply

**Peter Koch (Individual)**

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crucial

**Funmilayo ADEWUNMI (First Bright Technologies)**

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Hope someone really plans for this well in advance .

**James Laferriere (n/a)**

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I don't support derecognition.

**Raymond Mamattah (EGIGFA)**

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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?

**Lee Howard (IPv4.Global by Hilco Streambank)**

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### **24.4. Handoff - Somewhat Disagree (2)**

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

**Andrew Sullivan (N/A)**

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Even non-profit, RIR is people. If they fail to comply the trust will be reduced. There must be an option to transfer resource to another RIR (in the same region). The possibility of members migration will regulate it naturally.

**Sergey Kozhedub (IPTP Networks)**

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### **24.5. Handoff - Strongly Disagree (1)**

It is difficult to imagine a model in which this proposed principle makes sense. De-recognition of an RIR means it is not conforming to one or more of the underlying requirements that caused it to be recognized in the first place. What is the incentive for a de-recognized RIR to cooperate in the transfer of operation? What happens if/when they don't? Threat of de-recognition will obviously have little impact. This principle is also unnecessary if the "Continuity" ("Assumption of Service") principle is maintained.

**David Conrad (Layer 9 Technologies)**

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Requiring a Derecognized RIR to transfer its operations to a successor undermines its rights and disregards the investments and efforts it has made in serving its community. Forced transfer of operations undermines RIR autonomy and community trust.

**Noel OUPOH (DATACONNECT AFRICA)**

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NO. A proper system should be put in place as and when audits are happening. In the event of a derecognized RIR, the transfer can and should happen WITHOUT the derecognized interfering.

**Emma Perrier (AFRINIC Ltd)**

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Question 50&51 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. 1- Strongly Disagree I believe that requiring a Derecognized RIR to hand over its operations to a successor undermines its rights and disregards the significant investments it has made for its community. This approach fails to respect the RIR's autonomy and could destabilize the region by imposing an external entity that lacks local trust and understanding.

**Anjan Deka (HDFC)**

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## 25. Other comments or feedback

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I would rather not see the ASO/NRO reopen ICP-2 completely at the principles level with an ad hoc process. Rather, the questions at hand should be addressed by carefully scoped amendments. The approach chosen by the ccNSO with the Framework of Interpretation (FoI) and subsequent PDPs could be helpful and informative.

Peter Koch (Individual)

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- The methodology chosen to collect this feedback makes it difficult if not impossible for certain parts of the multistakeholder community to respond in a reasonable timeframe. For example, many organizations require vetting by legal staff any time statements are made that can be viewed as official pronouncements of the organization. As a result, the feedback collected may have unanticipated biases.
- Many if not most of these proposed principles aren't really principles. Traditionally, principles should be:
  - + Universal: They are broadly applicable across different contexts and cultures, though specific principles may vary by domain (e.g., personal ethics vs. corporate governance).
  - + Foundational: They underpin rules, laws, and policies but are less specific than those rules.
  - + Timeless: Principles generally endure over time, even as practices or applications evolve.
  - + Guiding: They offer direction rather than rigid instructions, allowing for interpretation in context. It may make sense to revise the proposed principles to ensure they meet these characteristics.
- These principles do not appear to derive from a firm conceptual model of RIR architecture. It feels more like a committee got together, threw a bunch of idea up on a wall, and bunched the result up into separate buckets and call those buckets a set of "principles." Since the RIRs and ICP-2 already exists, a different approach would be to accept the architectural model of the existing system and focus on what needs revision to ensure Internet registry numbers system evolves to what it should be and do, then derive the principles that would facilitate an evolution to that system. For example, one model might be: within the context of the global management of Internet numbers, the RIRs would be competitive registrars of a (conceptual or actualized) global centralized, singular registry of Internet numbers.
- These principles should explicitly address what constitutes an RIR stakeholder community as differentiated from its membership and what governance model(s) the RIRs should have.
- These principles must not depend on cooperative collaboration, but rather must assume an environment in which non-cooperative and non-collaborative parties will attempt to take advantage of any possible loophole.
- There is no principle related to accountability.
- There is no principle related to acting ethically and ensuring staff behave appropriately.
- Implementation Considerations:
  - All requirements of ICP-2 should be objectively verifiable
  - De-recognition as a penalty is a nuclear option – there should be some other form of penalty/sanction for an RIR that is not conforming to ICP-2.
  - It is unclear who applies sanctions and how. As the principles are expanded, this should be made explicit.
  - It is unclear how different legal, regulatory, stakeholder, and membership models are to be normalized and how this might affect making and enforcing decisions on RIR responsibilities, recognition/de-recognition of RIRs, or how disputes between RIRs can be resolved.
  - Any involvement by ICANN with any of these principles will likely require approval of the ICANN community via its Empowered Community. Given the lack of interest the RIRs have shown in the past about participating in ICANN-related processes, it is possible that obtaining this approval could be challenging, particularly since as the RIRs have pointed out on multiple occasions and via agreements with ICANN that the RIRs are solely responsible for Internet numbers related matters.
  - Ideally, there should be a principle of periodic review of ICP-2, to ensure it can be adjusted to deal with changes in the Internet over time.

David Conrad (Layer 9 Technologies)

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While my own input has already made before, I would like to submit valuable feedback from Japanese community in occasions of my presentations in Japan IGF and Japan Open Policy Forum. It was compiled into a blog entry here: <https://blog.apnic.net/2024/12/04/encouraging-icp-2-discussions-in-japan/> - Is this issue also relevant for NIRs? - Should the deployment of RPKI be seen as enhancing the enforceability of RIRs, and does this underscore the importance of proper governance? - Appeal/Dispute Resolution: While RIRs have not faced severe market competition, making such mechanisms unnecessary, ICANN, with its management of gTLDs, has established and evolved appeal and dispute resolution processes. - The need for institutional evolution as the market develops. - Concerns about how global Internet coordination mechanisms can be influenced by jurisdictional issues - The potential need for data escrow if de-recognition is part of the life cycle. - What kind of organizations could take over after the de-recognition of an RIR? - Considering the evolution of the number management scheme — from InterNIC to three RIRs, and then five — what is the rationale for maintaining the current system of five RIRs? - What about the possibility of an Interplanetary RIR as a sixth?

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

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The RIR system is a key part of the stable functioning of the Internet infrastructure. RIRs have a good track-record of collaborating with and supporting each other. These principles and any new document regarding criteria and operations for RIRs need to preserve that.

**Mirjam Kühne (RIPE)**

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Is there any discussion around a review of RIR assignment for Caribbean countries in the South American Region.

**Colwayne Babb (Cable and Wireless)**

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The Caribbean is divided between ARIN and LACNIC which is not necessarily an easy choice. Wouldn't a new RIR be a good idea for the development of this area of the Americas?

**Thierry Nagau (Dauphin Telecom)**

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Thank you.

**Emma Perrier (AFRINIC Ltd)**

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There should be fairness

**Funmilayo ADEWUNMI (First Bright Technologies)**

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If you want community participation, you've gone about it the wrong way. Ideas need discussion and debate to germinate and questionnaires fail to capture answers to questions the author didn't think to ask.

**William Herrin (Self)**

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There should be a recognition that a "region" on Earth is now too limited as definition and that the specific needs for space be identified and put into ICP

**Marc Blanchet (Viagenie)**

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Recurring RIR services are too high. The cost for an ASN per year is ridiculous, for what amounts to an entry in a database.

**j heasley (SNI)**

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all about right

**Faisal Abdu Juma (National Communication Authority NCA, Republic of South Sudan)**

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Should be enough

**Kuo Wu (TWIGF)**

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I think the following should be considered. 1. Dispute Resolution: A principle outlining a transparent and neutral mechanism for resolving disputes among RIRs or between RIRs and ICANN. 2. Capacity Building: A principle encouraging established RIRs to support capacity building for Candidate RIRs, including technical, operational, and governance training. 3. Inclusivity and Equity: A principle that mandates equitable treatment and access to resources for all regions, particularly underserved or emerging economies. 4. Environmental Sustainability: A principle encouraging RIRs to adopt environmentally sustainable practices in their operations.

**Lucas Chigabatia (Ghanaian Academic and Research Network (GARNET))**

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I apologise for being negative, but I'm now in a position where I need (newly allocated) resources, and can't get any 'cause AfriNIC's curatorship/official receiver status. And it's 'cause of greed, even though most of it should've been non-profit, the greed of the profiteers "captured" AfriNIC ;(

**Hendrik Visage (HeViS.Co Systems Pty Ltd)**

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Please save AfriNIC - or kill it and resurrect it in a different country

**Mark Elkins (Posix Systems)**

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The multistakeholder model for Internet governance has proven to be an effective, inclusive, and adaptable framework for managing the global Internet infrastructure. The collaboration between ICANN, RIRs, and other stakeholders has created a system that is transparent, accountable, and designed to promote the stability and growth of the global Internet. It has ensured that the voices of diverse stakeholders are heard and respected, fostering a trust-based system that benefits users around the world. The principles and practices outlined in this model, including community-driven policies, neutrality, and ethical governance, will continue to serve as a foundation for the sustainable development of the global Internet ecosystem. Overall, the work done by ICANN and the RIRs within this multistakeholder framework represents an exemplary model for collaborative governance in the digital age.

**Dave Kissoondoyal (Internet Governance Forum Mauritius)**

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AFRINIC should be assisted to stand back on its fit. Also measures should be put in place to prevent the case of AFRINIC not to be repeated in other RIRs. AFRINIC IPs being used in other regions should be redelegated to Africa.

**Raymond Mamattah (EGIGFA)**

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The current RIR system has 5 RIRs. Each RIR is independent and has its own Whois database. It is better to have a single global Whois database contents all Internet number resources.

**Benny Pan (NA)**

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Thank you for the opportunity to contribute.

**Russell Woruba (PNG Department of ICT)**

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There is need for strong regional contribution to the decision making process of their region

**Emmanuel Egbe (Nigeria)**

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RIR should be standard on their own and should be allowed to make decision concern their members

**Rasheed Shittu (STL FIBERCO LIMITED)**

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transparence, inclusive

**FARADJ MAHAMAT DJADDA (ministry of ICT)**

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The work on a statement of principles has been exemplary and should be welcomed. A lot of devil will be in the detail on implementation and particular text of the amendment ICP-2

**Paul Hjul (Crystal Web)**

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This is a good initiative and I think it's more than high time to ensure the RIR system is solidified.

**Musa Stephen HONLUE (AFRINIC)**

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These principles really added nothing new expect "dereconignition". there is no principle on how to enforce things...

**Adeola Alain P. AINA (Digital Intelligence Services, Sarl)**

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Thank you again to the NRO NC for undertaking this important and detailed work.

**Lee Howard (IPv4.Global by Hilco Streambank)**

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Thank you for the work you do!

**Xavier Clark (Harris Computer)**

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What if the coverage region wasn't geographic. Like in outer space or in a virtual region like Meta? Can they have an RIR?

**Mike Burns (IPTrading)**

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It should be considered also that the community can request ICANN to derecognize an RIR, and that the RIR may behave hostile towards this process as victim of an undesired capture.

**Hernan Arcidiacono (IPLAN)**

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This review work (and consultation) is important. Thank You!

**Carlos Friaças (FCT\| FCCN)**

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Overall these are appropriate and important principles.

**Andrew Gallo (The George Washington University)**

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This set of principles was a strong draft. Thanks to the team that developed them. This process for capturing feedback seems likely to be more effective than using a mailing list. Good choice!

**Leo Vegoda (And Polus LLC)**

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The NRO, or some similar body, should not only be a much stronger coordination body, but should have specific powers to ensure that RIRs adhere to the agreed principles.

**Kevin Meynell (Individual)**

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Thank you very much for the opportunity to make comments to the draft principle. As I mentioned in Derecognition in RIR Lifecycle, it would be much better to include another lifecycle between Operation and Derecognition to stipulate the remedial period for the failing RIR and the others to try the improvement of the operation of the failing RIR, in the principle document rather than stipulated only in the ICP-2 document itself, because of its importance.

**Akinori MAEMURA (JPNIC - Japan Network Information Center)**

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Thank you for all the hard work you put into this my previously fellow ASO AC members!!!

**Sander Steffann (SJM Steffann Consultancy)**

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