ICANN | ISPCP
Internet Service Providers & Connectivity Providers

7 October 2025

Subject: ISPCP comments on the Second Draft of the RIR Governance Document

The ISPCP welcomes this new opportunity to comment on the revised RIR Governance Document and commends the ASO for the development of more robust governance principles of RIRs.

Our previous comments can be found on the ISPCP webpage:

-      https://ispcp.memberclicks.net/assets/docs/PolicyStatements/2025_PolicyStatements/ISPCP%20ICP2rev2%20comments%20v1.0%20Final-26-05-2025.pdf (May 2025)

-      https://ispcp.memberclicks.net/assets/docs/PolicyStatements/2024_PolicyStatements/ISPCP%20ICP2%20comments%20v1.0%20Final.pdf (December 2024)

In addition to the comments made on the text, we offer the following general comments for your consideration:

- in the recognition Review in clause 2.3 (v), in the event of misalignment between the RIRs, it would be valuable to define (or clarifying further) the "independent third party". The decision on rejection/approval (including review) should be limited in time and clearly defined.

- Governance

    – ICANN may advise RIRs about " Good Governance Procedures" to maintain uniformity and continuity.

- Criteria for recognizing new RIRs are solid. However, regional realignment could lead to instability without stronger safeguards.

- Although control safeguards are important, it seems that the monitoring of affiliated entities still needs to be clarified.

- in 2.4 Audit: for regular or adhoc audits, it would be interesting to define:

    – Scope of audit.

    – Authority who can conduct audit

- In 2.5, there also be value in having more formal cooperation/coordination between RIRs.

- In 2.6, whilst appreciating the need for flexibility at RIR's level, specific criteria that would be common to all RIRs to (de)recognise NIRs, LIRs or other sub registries may be interesting

- in 3.1 c) noting the need for flexibility at RIR's level, there may be value in clarifying the notion of "Community"

- in 4.2, 3 years between audits seems too long, at least in the early years of a newly recognised RIR.

- in 6.2 emergency continuity plans are necessary, but the fixed 90-day limit may be too rigid for complex crises.

- in 6.2, in the event of financial difficulties to which RIR is not able to provide intended services, is there value in defining the mechanisms with which ICANN/ other RIRs may assist on temporary basis?

- ICANN's limited authority is a balance of oversight, but contingency plans for deadlock scenarios should be considered.

- English as the official language is practical, but encouraging multilingual access would improve inclusivity.

- The five-year review cycle is reasonable, yet the amendment process would benefit from more structured and more frequent community input

- consider policy to monitor performance of RIRs on an on-going basis (rather than touch points at recognition/derecognition of a RIR)

We reiterate our support for this effort and for the direction the draft is taking.