

15 April 2026

Structural review of ICANN

To: Tripti Sinha
Chair, ICANN Board of Directors

Dear Tripti,

As one of ICANN's founding constituencies, the ISPCP has actively represented ISPs and Connectivity Providers as part of the ICANN community since 1999. Over the past 28 years ICANN has faced many challenges as part of its mission to ensure a stable, secure, and unified global Internet, and should be commended for its pioneering multistakeholder approach in tackling those issues.

It is the view of the ISPCP that the challenges that ICANN will have to face in the immediate/mid-term as a result of changes to the Internet's ecosystem, driven by emerging technologies and advanced technical capabilities, will quickly surpass those of yesterday.

As such it is essential that ICANN quickly adopts a 'forward-looking' approach and is structured to meet those future requirements, as opposed to reflecting how well the current version of ICANN has done in meeting past demands.

The ISPCP welcomed the community effort that focused on a possible holistic review of the organization. After all, what global organization exists today that has never had a root and branch review of the organization for almost 30 years?

Recognizing that initiative was halted to be replaced by Cross Community Working Group (CCWG), tasked with evaluating the existing system of reviews and whether they are fit for purpose, ISPCP representatives have actively engaged in that initiative.

The fact that the CCWG was chartered to consider the validity and process related to all existing reviews of the organization as well as the possible introduction of a structural review has a direct impact on the timescale required to deliver a report. Meanwhile the clock keeps ticking!

It is the view of the ISPCP that any delay in initiating a structural review of the organisation, again emphasising this has never been undertaken since its formation nearly 30 years ago and recognizing the Internet of today is far different from those early days, will subject ICANN to increasing levels of risk.

To help explain the rationale for that level of concern we put forward the following, non-exhaustive, points:

- The manner in which the DNS operates today will fundamentally change, ranging from the interactions of humans accessing the Internet, through to changes to the Internet's architecture and the emergence of new players in the ecosystem.
- The impact of AI, including agentic AI, on Internet architecture and ICANN's areas of responsibility is already beginning to reshape operational processes and trust frameworks, creating both significant opportunities and new risks.

It is already evident that the use of agentic AI is proceeding at such a pace neither standardization nor regulation is able to keep pace and provide appropriate guard rails to steer early implementations.

- The emergence of new identifiers at the user/business/AI agent level will have a profound effect on the Internet and could impact the role and responsibilities of ICANN
- Advances in quantum networking and quantum computing may materially affect existing security, trust, and operational models
- Changes to the Internet that will occur through the rapid expansion of Software Defined Networks (SDNs) are also likely to have an impact
- The effects of the rapid deployment of satellite networks, facilitating Internet connectivity to remote locations, advancing IoT capabilities, and the provisioning of large data hosting platforms in space with enhanced internet connectivity requirements, all place additional demands on Identification and naming schemes.
- Impact of Web 3.0 (including decentralization) raises additional considerations
- The use of ICANN controlled identifiers for augmented reality is already a distinct possibility.

None of the points above should be viewed as distant or theoretical concerns. Many are already emerging today, and their potential impact should not be underestimated. The ISPCP, with many of its members directly engaged in technical developments related to these issues, considers it imperative that these aspects be examined without delay.

Meaningful discussion within the ICANN community can only occur if all parties have a good understanding of the problem space. As a result, insightful discussions on the validity and urgent need for a structural review of ICANN can only take place if all are cognizant of the increasing breadth and speed of the challenges that are coming our way.

Unfortunately, with such a diverse multistakeholder organization it cannot be taken for granted that all involved parties have a full understanding of such a rapidly changing environment.

To support informed and timely decision-making, the ISPCP recommends that the Board commission an independent external study, charged with providing a neutral and detailed assessment of the emerging Internet environment, its implications for ICANN's role, and the identification of potential new stakeholder groups that may need to be more actively engaged in ICANN processes.

An independent external assessment would provide added value by bringing neutrality, objectivity, and expertise from beyond the existing ICANN community. Given the pace and complexity of technological and ecosystem changes, it is important to draw on perspectives

from actors who may not yet be fully engaged in ICANN processes, including emerging technology leaders, infrastructure providers, standards bodies, and new classes of Internet users. Such an assessment would help ensure that ICANN's future structure and stakeholder model are informed by a broader and more representative understanding of the evolving Internet landscape.

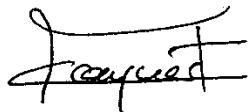
Only with such insight will ICANN be able to determine what changes may be required to remain fit for purpose and meet these emerging challenges.

It is the view of the ISPCP that proceeding with specific reviews before first considering ICANN's overall structural fitness risks limiting the effectiveness and relevance of those efforts. The need to ensure ICANN is agile, able and ready to face future challenges, rather than being dependent upon a structure set in place to address issues of yesteryear is paramount and must be the immediate priority.

ICANN's role as part of the Internet's ecosystem is fundamental in ensuring a stable, secure Internet that can meet both the challenges of today and tomorrow.

The ISPCP would welcome the opportunity for further discussion on this proposal and stands ready to contribute constructively to any next steps the Board may consider.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fouquart', with a stylized flourish above the name.

Philippe Fouquart

Chair, Internet Service Providers and Connectivity Providers Constituency (ISPCP)