

## ISPCP response to Review of Reviews outreach

### ISPCP Constituency Response to the Review of Reviews Cross-Community Working Group (ROR CCG) on Bucket C: Structural/Organizational Reviews

**Submitted by: ISPCP Constituency (Internet Service Providers and Connectivity Providers), GNSO**

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The ISPCP Constituency appreciates the opportunity to provide input to the Review of Reviews Cross-Community Working Group (CCWG) as it examines Bucket C, which encompasses structural or organizational reviews within ICANN. These reviews are essential for ensuring the ongoing effectiveness, accountability, and adaptability of ICANN's supporting organizations (SOs), advisory committees (ACs), and other key structures. As representatives of internet service providers and connectivity providers, we emphasize the need for reviews that support a stable, secure, and resilient internet ecosystem while minimizing disruptions to operational continuity.

Our response addresses the scope, factors, timelines, and integration of structural reviews, drawing on the principles of efficiency, inclusivity, and alignment with ICANN's mission. We propose the following considerations for Bucket C:

#### 1. Factors to Include and Exclude in Structural Reviews

Structural reviews should focus on core elements that directly impact the governance, decision-making, and operational effectiveness of ICANN's entities. **Included factors** could encompass:

- Top priorities
  - Governance structures, in particular:
    - Structural deficiencies and inter-subpart dynamics: Identification of shortcomings in the structure or in the interactions among its subparts that cannot be effectively addressed through a Supporting Organization (SO)-specific review.
    - Appropriateness and relevance of subpart placement: Assessment of subparts whose primary interests, responsibilities, or impacts extend beyond, or are misaligned with, the structure in which they are currently situated, and whether they are relevant for the present and the future.
    - Adequacy of ecosystem representation: Consideration of whether the current structure sufficiently represents relevant participants within the Internet ecosystem, including identification of under-represented or unrepresented stakeholders.
    - Overall structural coherence and effectiveness: Evaluation of whether the structure, as designed, supports effective coordination, accountability, and decision-making across its constituent parts.
  - Associated board composition, and decision-making processes.
- Secondary priorities
  - Resource allocation and financial sustainability.
  - Alignment with ICANN's bylaws, mission, and strategic objectives.
    - Stakeholder engagement mechanisms, including diversity, inclusivity, and participation metrics.
  - Performance against key performance indicators (KPIs) related to policy development, advisory functions, and community support.

**Excluded factors** should avoid overlap with other review mechanisms to prevent redundancy and review fatigue. These may include:

- Day-to-day operational details better suited for annual operational reports or audits.
- Specific policy outcomes, which fall under policy development processes (PDPs) or specific reviews (e.g., in Bucket A or B).
- Technical root server operations or IANA functions, unless they directly intersect with organizational structure.
- Broader internet governance issues not core to ICANN's remit, to maintain focus and efficiency.
- Review of ICANN Paid manpower

By clearly delineating scope, structural reviews can remain targeted and actionable.

## **2. Timelines for Structural Reviews**

We recommend establishing clear, predictable timelines to ensure regular assessment without overburdening the community. A standard cycle of **every 8-10 years** per reviewed entity could balance thoroughness with resource constraints, allowing time for implementation of prior recommendations, whilst the first review should happen as soon as possible.

Specific suggested timelines:

- Initiation: 2 months for scoping and team formation.
- Execution: 4-6 months for data collection, analysis, and drafting.
- Finalization and Implementation: 4-6 months for public comment, board approval, and initial action planning.
- First iteration starting asap

These phases should include milestones with community checkpoints to enhance transparency.

## **3. Mandatory vs. Flexible Timelines**

While a mandatory baseline schedule is necessary for accountability and predictability, flexibility should be incorporated to address emergent needs. Reviews could be advanced or delayed by up to 1-2 years based on triggering events, such as:

- Significant organizational changes (e.g., bylaws amendments or major restructurings).
- External pressures like regulatory shifts or global events impacting ICANN's operations.
- Community consensus via a formal petition process involving at least two SOs/ACs.

This hybrid approach—mandatory with justified flexibility—ensures responsiveness without undermining the review framework. Any deviation should require board approval and public justification to maintain trust.

## **4. Incorporation of Results/Impact from Prior Structural Reviews**

Structural reviews must build on previous ones to track progress and avoid repeating efforts. Each review should mandatorily include:

- An assessment of the implementation status and measurable impact of recommendations from the last review.
- Lessons learned, including successes, challenges, and unintended consequences.

- Metrics to evaluate long-term effectiveness, such as improved stakeholder satisfaction or enhanced decision-making efficiency.

This iterative approach promotes continuous improvement and accountability.

## **5. Integration of Outcomes from Strategic Plans, Ad Hoc Reviews, and Reports**

To provide a holistic view, structural reviews should incorporate relevant inputs from other ICANN processes:

- **Strategic Plans:** Alignment with ICANN's multi-year strategic objectives, including progress toward goals like diversity or digital inclusion.
- **Continuous Improvement Plans (CIPs)** or similar mechanisms: Outcomes from targeted investigations, ensuring structural reviews address any identified gaps.

These integrations should be selective, focusing on elements that inform structural enhancements.

## **6. Consideration of Relations with External Organizations**

Structural reviews should evaluate ICANN's inter-organizational relationships to strengthen global cooperation. This includes:

- Interactions with organizations such as the Internet Society (ISOC), Regional Internet Registries (RIRs), or standards bodies (e.g., IETF), assessing synergies or overlaps.
- Opportunities for knowledge sharing or joint initiatives that enhance ICANN's role in the broader internet ecosystem.

Such considerations ensure ICANN remains adaptive in an interconnected global environment.

In conclusion, the ISPCP supports a refined approach to Bucket C that emphasizes efficiency, integration, and flexibility. We urge the ROR CCG to prioritize community input in finalizing these elements and to pilot any changes in a low-impact manner. We are available for further discussion and look forward to collaborating on implementation.