



30 July 2026

ISPCP response to Public Comment - Review of Reviews Draft Report

Executive Summary

The ISPCP thanks the Review of Reviews Cross Community Group for its June 25, 2026 draft report and its proposal for a comprehensive reform of ICANN's review system to make it **more efficient, strategic, flexible, and sustainable**, while preserving ICANN's core mission.

The ISPCP supports the objective of strengthening **accountability and transparency**. However, the report does not appear to deliver a simpler, more predictable, or more flexible review system. Instead, it introduces significant process overhead that limits the required flexibility associated with a complex and unpredictable scoping procedure. Because substantial scoping authority would rest with the Reviews Scoping Committee, the framework risks reducing predictability and weakening the ability of these reviews to produce measurable improvements.

In particular, the report should more clearly explain the relationship, sequencing, and dependencies among the proposed reviews. In addition, to textual descriptions, the final report should include a general flowchart of the reviews, showing review timelines, dependencies, and which reviews should occur first. An updated version of the [chart shared during the July 14 webinars](#) reflecting Public Comment input, would be helpful.

The ISPCP considers Structural Reviews to be critical, our constituency recommends that the final framework:

- Clarify that first structural review begins as soon as possible. The exact date of its first instance should be clarified:
- Establish the cadence of the structural review of 8-10 years
- Limit the review timeline of the structural review to 18 months
- Permit deferrals only in exceptional circumstances, subject to a clear maximum delay

ISPCP's response to Public Comment

The ISPCP thanks the Review of Reviews Cross Community Group for its June 25, 2026 draft report and for its proposal for a comprehensive reform of ICANN's review system to make it **more efficient, strategic, flexible, and sustainable**, while preserving its core mission. This response provides ISPCP's inputs on the following aspects of the draft report:

- 1) Procedural concern regarding the draft report

- 2) Accountability and Transparency Reviews
- 3) Structural Reviews
- 4) On-Demand Review Framework
- 5) Reviews Scoping Committee
- 6) Strengthening Implementation
- 7) Consequential Effects Review

Procedural concerns

The ISPCP understands that the draft report was not presented to the CCG for a consensus call. Rather, the draft of the final report was presented to the CCG members, but not all their individual comments were accommodated, not so much because they were questioned but it was deemed preferable to wait until the public comments to do so.

In this respect, we understand that the absence of formal working procedures for a CCG (as opposed to the uniform framework for a CCWG) did not help consolidating all comments from its members before the public comment period. The ISPCP believes the final report should clearly explain the process followed, including how CCG members' input was considered and whether the draft reflects consensus or only the views of certain participants.

The ISPCP also notes that the report makes no mention of alternative approaches for all, or part of, the new Review Framework that were presented to the CCG. It would have been helpful to better document the options available for the Community members to position themselves rather than waiting for the Public Comment for them to do so.

Accountability and Transparency Review (ATR)

ATRTs are intended to assess whether ICANN is fulfilling its Mission and complying with its Bylaws, Articles, Commitments, Core Values, and Transparency Obligations. Under the proposed framework, each ATR would begin with a structured, community-driven scoping process to determine the topics to be reviewed, and ensures review focuses on the community's highest priorities.

ISPCP's comments:

ISPCP feel that ATR review suggested in the draft report requires clarification on the following aspects:

- 1) The scope of ATRTs proposed in the draft report is unclear: on one hand the report says it maintains the scope established for ATR in the Bylaws, on the other hand the scope is decided by a Standing Committee.*
- 2) The scope of the ATR must be consistent with the 5-year Strategic plans, Operational plan, Bylaws and missions of ICANN that are modified from time to time. In addition to these, scoping committee may include current important and pressing issues based on priority set by So/Acs.*

- 3) *Cadence may be 5 years as suggested but the review may be completed in not more than 12 months from date of approval of scope.*
- 4) *Deferral of ATR should be avoided and the threshold for deferral should be a high.*
- 5) *Manpower resources, if not available from specific SO/ACs, may be managed by volunteers from other SO/ACs, but a Review may not be deferred due to resource constraints. In this respect we do not consider “backfilling” to be an issue.*
- 6) *Implementation of review outcomes must be monitored by an independent committee, different from the scoping and review committee, with regular status updates provided to the SO/Acs and the Board.”*

Structural Review

Structural reviews would provide a dedicated mechanism for evaluating ICANN's institutional structure and governance. They should examine whether ICANN's organizational framework remains fit for purpose and recommend structural improvements where appropriate. The draft report proposes a cadence of **15 years** and invites community feedback on whether a 10-year cycle would be more appropriate.

ISPCP's comments:

- 1) *The ISPCP does not support a 15-year cadence. A review cycle of this length is not appropriate for the pace of change in the Internet ecosystems. The cadence should be reduced to 8-10 years.*
- 2) *The review timeline should be aligned with that cadence and limited to 18 months.*
- 3) *Deferral should be permitted only under exceptional circumstances and subject to a hard stop. A maximum of 2-3 years should be set for such deferrals to prevent Structural Reviews from becoming open-ended or indefinitely delayed.*
- 4) *Given the central role of the structural review and its direct impact on other reviews, it should be the first review to be launched and should appear as such in a flowchart.*
- 5) *Recognising that the previous review process was halted a considerable time ago, the Structural review should begin at the earliest possible opportunity in order for ICANN to remain accountable to the broader Internet community.*
- 6) *The draft report provides no rationale for having a 15-year cadence. In prior contributions (see <https://www.ispcp.info/policy-statements>), the ISPCP recommended an 8-to-10 year cycle. That recommendation should be reflected in the final report. A three-year review is not sustainable in the Internet ecosystem. It would require extensive community resources for an effort and could prove obsolete after 3 years. The same concern applies to the 15 year cadence, 15 years is too long to wait between reviews. Given the pace of technological, operational, and governance change, a 15-year interval is unjustifiable.*

Regarding phase 1 and phase 2 (internal and external landscape Assessments) the ISPCP would like to refer to the discussion in our [letter to the Board](#) on this topic on April 15th.

The ISPCP would expect these points to be clarified by the CCG.

On-Demand Review Framework

The report introduces the concept of an **On-Demand Review Framework** to launch focused reviews when justified by the community.

ISPCP's comments:

The ISPCP considers Stability and Security and the Registration Directory Service address issues too central to ICANN's mission and accountability obligations to be handled only through on-demand reviews. These areas should instead be subject to regular and systematic checkpoints.

These Stability, Security, and Resiliency Reviews are essential to ICANN's mission and should have a defined cadence aligned with ICANN's strategic plan. Likewise, Registration Directory Service Reviews (RDRS) and Registration Directory Service (RDS) Reviews should occur with sufficient regularity given their importance in ICANN's mission and accountability obligations.

Reviews Scoping Committee (RSC)

An important proposal of this draft report is the proposal of a permanent **Reviews Scoping Committee (RSC)**. The mandate of the RSC seems overly broad, and its responsibilities would include:

- identifying and prioritizing review topics;
- coordinating review timing;
- assessing resource availability;
- avoiding duplication across reviews;
- developing review charters;
- coordinating between the community, ICANN org, and the Board.

ISPCP's comments:

- *The ISPCP understands the draft report to give the Review Scoping Committee broad authority to define the scope of each review in its entirety, possibly regardless of what is established in the Bylaws. The final report should clarify the limits of the RSC's authority. In particular each periodic review should retain a mandatory baseline scope grounded in the Bylaws, with the RSC permitted to add topics only where appropriate and consistent with the baseline. Giving the RSC unrestricted discretion to redefine the review scope would not be consistent with the spirit of the Bylaws.*
- *The draft report also states that the RSC would include a member of the leadership of each SO/AC. This should be expanded to include nominated representative to ensure appropriate flexibility and participation. The task expected from RSC members is likely to be a demanding one, and it should not be assumed that it might be the SO/AC Chair by default.*
- *The report assumes that RSC is a 'standing committee' with a continuity of members. Although we see benefits in having a stable slate of participants, there are drawbacks*

in having the same individuals providing recommendations on next steps for all review initiatives of this nature over a long period of time.

- *Finally, the working procedures and membership of the RSC should consider the fact that for some SO/ACs there are issues for which there cannot be one single view to express, and it may be impossible for one SO/AC member to contribute efficiently and reflect that variety of views. In such a situation, working procedures intended for a review framework that would by default promote status quo would not constitute a proper accountability and review instrument.*

Strengthening Implementation

The report identifies implementation as one of the significant weaknesses of the current review system, and among other recommendations, it proposes keeping Review Teams (RT) active until the Board has acted on their recommendations.

ISPCP's comments:

The ISPCP does not see a clear benefit in keeping a review team active after it has submitted recommendations that have been agreed upon by the review team. The final report should clarify the purpose of an RT being active at that stage, what work it would be expected to perform, and how continued activity would improve implementation outcomes.

Consequential Effects Review

The report notes that SO/ACs may independently consider restructuring at any time, independent of the Structural Review.

ISPCP's comments:

- *The ISPCP recommends that the final report clarify the timelines and triggering criteria of the Consequential Effects Review.*
- *While available bandwidth and competing review work may be relevant considerations, they should not be used as the sole basis for delaying or preventing a necessary review. The framework should establish a clear maximum delay period to ensure that the Consequential Effects reviews can be initiated when warranted.*