

Submission: Functional Model for Root Server System Governance

19 September 2025

The Council of ICANN's Country Code Names Supporting Organisation (ccNSO) is pleased to offer this brief response to the call for public comments on the report setting out the proposed Root Server System Governance Structure. For avoidance of misunderstanding, this comment is a ccNSO Council comment only, and the views expressed in this comment should not be interpreted as views from the ccNSO members, nor from individual ccTLD managers.

The Council commends the extensive work that has gone into the preparation of the report, and thanks all of the community volunteers who have contributed to the work.

The Council offers the following comments:

- The proposal is supported in broad terms. It is important to provide a structured governance framework for the Root Server System given its importance to the stability and security of the domain name system and the Internet. The proposed Model does create such a framework.
- In a broad sense the powers and responsibilities proposed for the new Governance Structure are appropriate. The ccNSO Council does not offer any specific comments on or criticisms of what is proposed.
- The ccNSO Council observes that it will be important for the Governance Structure to be able to change as the nature of the Internet and the way the root zone is managed changes over time. This Governance Structure must not commit to, or prevent, changes to these arrangements being made over time.
- There is a degree of concern about the size of the proposed governing body. A group of twenty-four people plus liaisons is a large group for effective deliberation and decision-making. It is also another volunteer commitment for ccTLD Managers to contribute to, at a time when there is some pressure on volunteer resources already within the work of the ccNSO. We appreciate the need for balancing of interests, however the ccNSO Council believes that the proposed mechanism may become unsustainable due to lack of volunteer resources. We therefore suggest to the working party to consider (again) alternatives, with a perspective of sustainability of effective deliberation and decision-making, for example by reducing the size of the Root Server System Council or introducing weighted voting.
- There is also a degree of concern about how to finance the proposed Governance Structure - greater clarity and detail on this in the final report would be of benefit. The ccNSO Council does not hold the view that there is a necessary or inevitable connection

between any financial requirements, and the standing of particular stakeholder communities as participants in the proposed Governance Structure.

The concerns noted above are for the RSS GWG to consider, alongside other responses to the call for public comments. We hope that they can inspire some further refinement and development of the proposal.

The ccNSO Council is of the initial view that if the proposed Governance Structure is established, the ccNSO should participate. This conclusion may change depending on any changes to the proposal as the RSS GWG finalises its report.

Best regards,

Alejandra Reynoso
ccNSO Council Chair