

Introduction

In response to a request by the SO/AC Chairs at its August 2024 Roundtable meeting, ICANN org completed an analysis on previous Review recommendations, located in Appendix A. The data in this analysis may support discussions on Reviews on two levels: 1) Addressing challenges with activities in progress, and 2) Considering steps to anticipate and address future challenges.

1. Current challenges: Pilot Holistic Review and Continuous Improvement Pilot

Background: Community confusion over the purpose of the Third Accountability and Transparency Review (ATR3) Recommendation to create a Holistic Review and its relationship to another recommendation to evolve Organizational Reviews into a Continuous Improvement Program has persisted since the review team's Draft Report in December 2019. The community, Board, and ICANN org spent three years attempting to provide greater clarity, including 2 years developing the Pilot Holistic Review Team's Terms of Reference prior to the initiation of both projects.

Current Status: After 4 months of discussion, the Pilot Holistic Review Team has been unable to reach agreement on the intended purpose of the Holistic Review - is it supposed to be a Structural Review of ICANN or a community Review that replaces the Organizational Reviews in accordance with the Continuous Improvement Program? The team has also been unable to begin work on developing guidelines for the review of the Continuous Improvement Program as the operational design of the program continues and has not been operationalized across the community yet.

A [Public Comment period](#) on the Continuous Improvement Framework has additionally revealed confusion throughout the community on how the Continuous Improvement Program will be implemented community wide and how it will work with the Holistic Review. In light of confusion over the overlapping Reviews work, the Registrar Stakeholder Group (RrSG) specifically [urged](#) ICANN Org to "work with the Community to streamline and rationalize these efforts and to ensure that they are constructive and effective without placing an unsustainable burden on Community resources."

A potential pathway forward could be to create a small team, consisting of Pilot Holistic Review Team members and SO/AC leaders involved in the Continuous Improvement, to clarify the purposes of the Holistic Review and the Continuous Improvement Program, and their relationship. The team's proposal could be socialized with the greater community for further alignment so that both tracks can proceed effectively.

2. Future Challenges: Anticipated Reviews

Background: The ATR3 recommended that The Fourth Accountability and Transparency Review (ATR4) assess the utility of the Security, Stability, and Resiliency Review (SSR) and the Registration, Directory, and Service Review (RDS) given changes in the ICANN ecosystem.

Note: This would allow for the fundamental reevaluation of two of the four Specific Reviews. In April 2024 the ICANN Board [deferred](#) ATR4 by "a limited period of time not to exceed 12

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months”, with community support for a limited deferral, due to the significant amount of community work being undertaken to implement the Pilot Holistic Review and Continuous Improvement Program.

During this time, ICANN org was also working to consider and develop possible updates to the operations of Specific Reviews to provide for increased community alignment and efficiencies in the Review process.

Current Status: ICANN org opened a [Public Comment proceeding on proposed updates to the Operating Standards for Specific Reviews](#) on 23 December 2024. The proceeding will remain open through 21 March 2025. Proposed updates to the Operating Standards include mechanisms to facilitate community alignment on specific focus areas in advance of a review, project planning methodology, and other areas.

The Fourth Accountability and Transparency Review (ATRT4) is scheduled to be considered for initiation by the Board in April 2025, subject to an update on the status of the implementation of ATRT3 recommendations, including the Pilot Holistic Review and the Continuous Improvement Program, and community discussion.

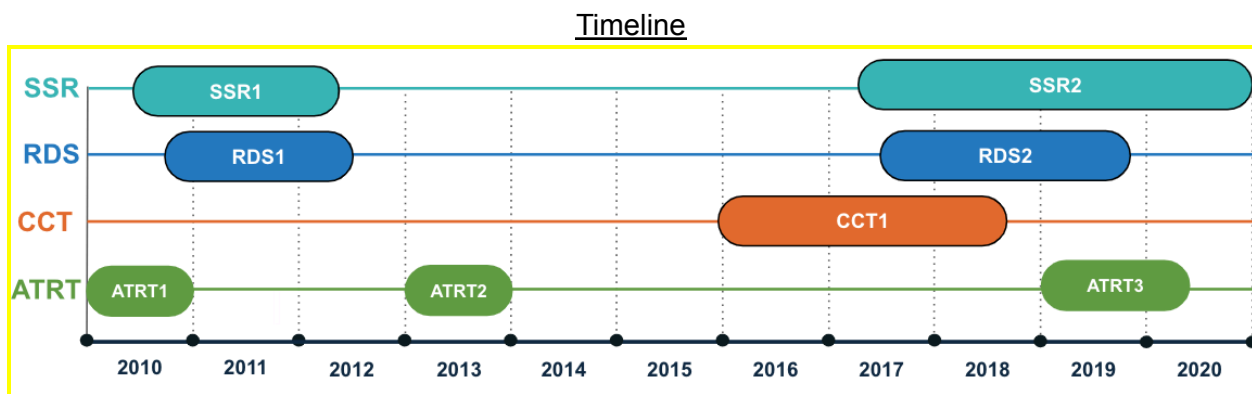
APPENDIX A

SPECIFIC REVIEW DATA

I. Specific Reviews 2009-2024¹

Since 2009, eight Specific Reviews have been completed, with 218 recommendations generated, out of which 154 have been approved. Each review lasted two years on average and involved an average of 15 community volunteers. See below for details on the status of recommendations and implementation by each type of review.

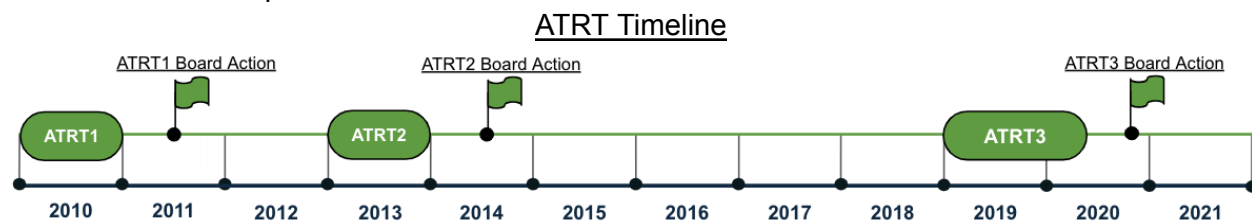
For the most recent review efforts, quarterly implementation status reports are available in the [Specific Reviews section](#) of ICANN.org.



Accountability and Transparency Reviews

Since 2009, there have been three cycles of the Accountability and Transparency Reviews.

- ATRT1 took place in 2010, with three Ex-Officio members and 12 members.
- ATRT2 took place in 2013, with three Ex-Officio members, 11 members and two independent experts.
- ATRT3 took place in 2019-2020, with 18 members.



	ATRT1	ATRT2	ATRT3
Final recommendations issued	27	12	15

¹ Cadence and composition of community-led review teams changed between Affirmation of Commitments and Specific Reviews.

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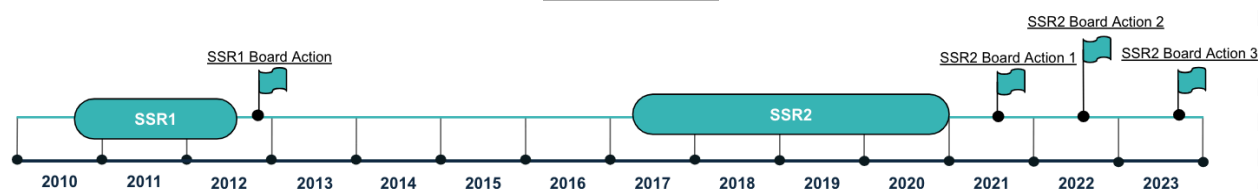
Approved recommendations	27	12	15
Implemented recommendations to date	Org concluded implementation work. The subsequent review team's mandate includes an assessment of prior implementation.		8
Rejected recommendations	N/A	N/A	N/A
Recommendations pending Board consideration	N/A	N/A	N/A
Fact Sheet	N/A	N/A	Link

Security, Stability and Resiliency of the Domain Name System Reviews

Since 2009, there have been two cycles of the SSR Reviews.

- SSR1 took place in 2010-2012, with one Ex-Officio member, 10 members, and two independent experts.
- SSR2 took place in 2017-2021, with 16 members.

SSR Timeline



Note: The Board [took action](#) to approve SSR2 Recommendation 17.1 as fully implemented in December 2024.

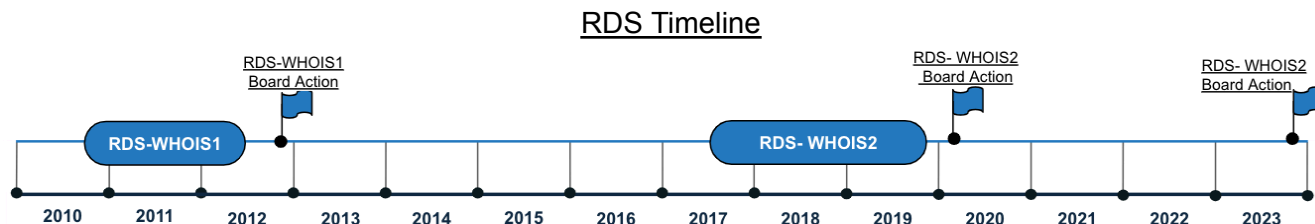
	SSR1	SSR2
Final recommendations issued	28	63
Approved recommendations	28	25
Implemented recommendations to date	Org concluded implementation work. The subsequent review team's mandate includes an assessment of prior implementation	
Rejected recommendations	N/A	38
Recommendations pending Board consideration	N/A	0
Fact Sheets	N/A	Link

Registration Directory Service Reviews (previously WHOIS)

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Since 2009, there have been two cycles of the RDS Reviews.

- WHOIS1 took place in 2010-2012, with two Ex-Officio members, 9 members, two independent experts, one law enforcement representative.
- RDS-WHOIS2 took place in 2017-2019, with 11 members



	WHOIS1	RDS-WHOIS2
Final recommendations issued	16 ²	22 ³
Approved recommendations (in whole or in part)	16	15
Implemented recommendations to date	Org concluded implementation work. The subsequent review team's mandate includes an assessment of prior implementation	14
Rejected recommendations	N/A	6
Recommendations pending Board consideration	N/A	0
Recommendations passed through to the ICANN community (in whole or in part)	N/A	2
Fact Sheets	N/A	Link

Consumer Choice and Consumer Trust Review

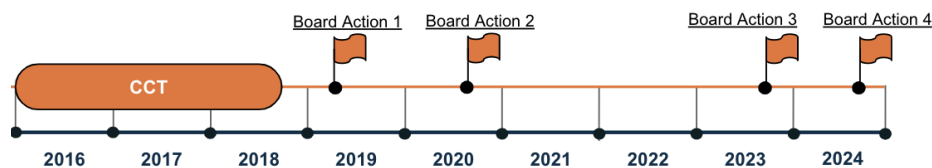
Since 2009, there has been one cycle of the CCT Review.

- CCT1 took place in 2016-2018, with two Ex-Officio members, 11 members and four independent experts.

² Board directed ICANN org to implement recommendations that differed from those issued by WHOIS1.

³ RDS-WHOIS2 Recommendation CC.1 was approved in part and passed through to a community group in part, and is included in the numbering of both categories.

CCT Timeline



	CCT1
Final recommendations issued	35 ⁴
Approved recommendations (in whole or in part)	17
Implemented recommendations to date	5
Rejected recommendations	6
Recommendations pending Board consideration (in whole or in part)	0
Recommendations passed through to the ICANN community (in whole or in part)	14
Fact Sheet	Link

II. Costs and challenges of current approach to Specific Reviews

Use of volunteer and staff time

The resources required to support the last four Specific Reviews combined included \$3.4 million and required an estimated 10,000⁵ hours of community member time and 20,000 hours of ICANN org support. This includes administrative support, subject matter support, meeting logistics support, and drafting support. This does not include the work and time needed to prepare for the review, or the assessment and implementation of the recommendations that are eventually approved. For additional information please refer to the Review Fact Sheets provided above.

Interdependency of recommendations and other constraints

Analysis of over 200 review team recommendations reveals that there are significant interdependencies between various recommendations and projects which, at times, results in duplication of work or lack of clarity. For example, one recommendation from ATRT3 depends on another ATRT3 recommendation to be implemented – Recommendation 3.5 to implement a Holistic Review and Recommendation 3.6 to Evolve Organizational Reviews into a Continuous Improvement Program (CIP). The new Holistic Review will evaluate the effectiveness of the Continuous Improvement Program implemented by community groups, but the work to put this Continuous Improvement Program in place needs to happen first. Community input received via

⁴ CCT Recommendations 16 and 20 were approved in part and passed through to community group(s) in part, and are included in the numbering of both categories.

⁵ Actual volunteer time is believed to be substantially more than ICANN can track through meeting attendance.

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Public Comment on the Continuous Improvement Program Framework additionally revealed confusion over how the program will be operationalized and work with the Holistic Review. Although the plan is for the Continuous Improvement Program to replace Organizational Reviews with a more flexible methodology to measure a structure's impact and effectiveness, how this would be achieved and work with the Holistic Review remains unclear.

There are some recommendations that are dependent on the community or other factors outside of Board's and org's control and remit. Examples of community-driven dependencies include:

- The Name Collision Analysis Project, which resulted in the Board placing the SSR2 Recommendation 17.1 in pending,
- Phase 1 implementation of the EPDP Temporary Specification for gTLD Registration Data, and the resulting Registration Data Policy, affected implementation of Board approved RDS-WHOIS2 Recommendation CC.2,
- The topic of Board approved CCT Recommendation 31 was examined by the New gTLD Subsequent Procedures PDP Working Group.

In other instances, the implementation work cannot be completed in time for the next review to start, creating timing constraints and the need to defer reviews. For example, [ATRT4 was deferred](#) to allow time for the implementation of two ATRT3 recommendations (Holistic Review and Evolution of Organizational Reviews into a Continuous Improvement Program).

Rejection or placement of recommendations into a pending category

The last review cycle (ATRT3, SSR2, RDS2, and CCT1) produced 125 recommendations.

- of which 31% were approved on the first pass within the required 6 months,
- 43% were placed into pending category requiring additional clarity or resolution of dependencies,
- 14% were rejected as not feasible, and
- 12% were directed to community groups for consideration.

Extensive effort on the 43% placed into pending the category resulted in a substantial number of those recommendations being ultimately rejected after several years of work.

For example, of the 63 recommendations produced by the SSR2:

- the Board was able to take action on 29 recommendations within the required 6 months,
- 3 recommendations took 16 months,
- 21 recommendations took 22 months,
- 9 recommendations took 32 months,
- 1 almost 4 years since SSR2 issued their final report.
- This means that on average, it has taken the Board and org 16 months to come to a resolution on SSR2 recommendations, nearly 3 times longer than mandated.

Resource cost

In addition to professional services and travel expenditures, the resources allocated to the reviews include the time spent by:

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- Community members to participate in the reviews, monitor progress, provide input to review documents
- The Board to monitor the reviews, consider recommendations, and monitor the implementation work, and
- ICANN org to prepare for the review, support the review effort and Board's consideration of review outputs, and to implement Board approved output.

Resources spent should be considered in relation to the benefit resulting from the reviews.