

# ICANN | ISPCP

Internet Service Providers & Connectivity Providers

2 June 2026

The Internet Service Providers and Connectivity Providers (ISPCP) thanks the Review of Reviews Cross Community Group (CCG) for their work in the development of “a refreshed system of reviews that meets current and future needs” through the Refined Proposal Outline. The ISPCP offers the following comments to the proposal.

## **Accountability and Transparency Review**

ISPCP’s recommendation:

- Without questioning the merits of the proposal, given the differences with the ATRTs as defined in the bylaws, more clarity on how those differences should be accommodated appears necessary (eg Bylaws change)

## **Structural Review**

1) Duration (focus and timeline of structural reviews): from beginning to end, the review process is defined to take 33 months (almost 3 years) to produce its recommendations. With the necessary public comment period and the time for the Board’s consideration, the process is therefore designed to take at least 4 years for these recommendations to be implementable. The ISPCP considers this timeline to be unnecessarily lengthy, when ATRTs took only 1 year.

ISPCP’s recommendation:

- The duration of the review effort should be reduced to 18 months to maintain continuous community engagement in the process and consistency throughout (3+8+7 months for the 3 phases). To that end, the review may rely on the external landscape assessment to identify the shortcomings of the Community’s internal landscape, so that the first 2 phases can be shortened.

2) Cadence: the review process suggests a cadence of 15 years between a board’s approval and the beginning of the next structural review. With a holistic structural review intended to make sure that the Community’s structure is an accurate reflection of the stakeholders’ ecosystem, we consider this cadence to be too long.

ISPCP’s recommendation:

- The cadence should be aligned with ATRT3’s recommendation on the matter, ie 7 years or at a maximum of 8-10 years. The overall timeline taking into account

the structural review effort, the public comment and time for board consideration should be included in the timeline.

- There should also be clarity on when the first structural review effort is conducted. Given that the current structure has been in place for 25 years, it is within the spirit of this proposed framework for the initial structural review effort to start asap after this review of reviews framework is approved.

2) Remit: the structural review questions to what extent the Board and staff (ICANN organization) should be part of the structural review

ISPCP's recommendation:

- The Board and its functioning as being partly appointed by the structure should be part of the review, if only for these appointments to reflect the new structure. There would also be benefit including "staff" (ICANN organization) in this scope, at least for what relates to its interactions in the Community and the stakeholders. We may rely on the review team to make sure that such recommendations are proportionate and do not deal with what arguably be considered as micro-management of the org's structure.

3) Deferral: the paper considers various means of deferring a structural reviews, noting that given the cadence and the deferral, the initial assessment may even have to be reconducted from scratch, and the process restarted all over again.

ISPCP's recommendation:

- there should be a hard stop to deferrals to make sure that the structural review becomes an open-ended effort. A maximum of 2-3 years should be set for such deferrals.

4) scoping committee: the framework considers an equal representation from all SO/ACs in the scoping committee.

ISPCP's recommendation:

- whilst having some representation of all SO/ACs is necessary, consideration should be given to having a smaller granularity for some SOs, e.g. an additional SG/C direct representation in this group.

### **On demand Review**

ISPCP's recommendation:

- Stability and Security is critical for ICANN mission and having a cadence for SSRs rather than leaving them only on-demand is important. These SSRs should be aligned with the timeline and objectives of the strategic plan.
- Likewise, there would be benefit in having some regularity associated with the Registration Directory Service Reviews (RDS) given their importance in ICANN's mission.