

# Tucows input: Review of Reviews

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Tucows appreciates the Cross Community Group (CCG)'s work through the ongoing Review of Reviews process—noting especially the ICANN Wiki space—and welcomes the opportunity to provide input on the work thus far.

Tucows Domains is the largest wholesale domain registration services provider in the world; the Tucows Family of Registrars includes Enom, LLC (IANA 48), Tucows Domains, Inc. (IANA 69), EPAG Domainservices GmbH (IANA 85), and Ascio Technologies, Inc. (IANA 106). Tucows Domains also includes a registry services platform built for resilience, scalability, and global distribution. Based in Canada and with offices globally, Tucows is a staunch supporter of the free and open Internet. We participate in policy development at ICANN and in other venues, advocating for a data protection by design and by default approach to Internet policy and working to ensure that our customers' and Internet users' concerns are considered.

## The importance of Reviews

ICANN's bylaws rightly require reviews because, as noted in the [Purpose of Reviews Document](#), they are how the Community can rest assured that ICANN is “fulfilling its Mission, Commitments and Core Values as set out in the ICANN Bylaws in a transparent and accountable manner”. Reviews provide the necessary time and structure to consider whether the ongoing operations and outcomes of the ICANN multistakeholder process are functioning as expected and to the benefit of relevant stakeholders. **As such, it is crucial that the review process itself is effective and efficient in order to ensure that any departure from the Mission, Commitments, and Core Values is identified and corrected in a timely manner.**

## Required Reviews are in need of streamlining

The Charter for this CCG documents five sets of Reviews required under ICANN's Bylaws which are part of this review. Tucows understands that these Reviews may overlap in subject, take longer to complete than is allotted to the Review period, and require significant resourcing from the Community and ICANN Org. **It is appropriate and necessary to review and streamline the Review process, ensuring that Reviews are effective and efficient.**

Tucows understands that the CCG is considering five “buckets” of Reviews: Accountability and Transparency; Continuous Improvement Program; Structural Review; Review of Reviews; and *Ad hoc* for reviews not included in the other buckets. Tucows agrees with the CCG that

these are the appropriate categories of Reviews in order to cover the necessary aspects of ongoing ICANN operations and to ensure that the Mission, Commitments, and Core Values are fulfilled.

We look forward to better understanding the relationship between the existing five sets of Reviews required under ICANN's Bylaws and the proposed new five groupings of Reviews to ensure that the Bylaws requirements are appropriately fulfilled in the new Reviews system.

## **Reviews have a unique purview**

Tucows notes that Reviews must never stray into policy development nor duplicate the function of the Supporting Organizations and Advisory Committees. We trust that the CCG is taking this into consideration as part of the Review of Reviews.

## **Conclusion**

Reviews are an essential element of the multistakeholder process, allowing the Community to ensure that ICANN is "fulfilling its Mission, Commitments and Core Values as set out in the ICANN Bylaws in a transparent and accountable manner". The CCG working on this topic is moving in the right direction, bringing us toward a more efficient and effective process that will maintain the sustainability and stability of the multistakeholder process for decades to come.

Tucows again thanks the Cross Community Group for their important work on this Review of Reviews and looks forward to their session at ICANN85 and the forthcoming Public Comment period.

Thank you,

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