

## **ICANN Board Input to Reviews CCG May 2026**

The ICANN Board thanks the Review of Reviews Cross Community Group (CCG) for the opportunity to provide comments and offers the following for the group's consideration.

### **General Principles**

The Board originated this community dialogue after careful and thorough consideration on the need for a refreshed Reviews system, as detailed in the rationale for its 19 May 2025 resolution. As the Board has followed the work with keen interest and received frequent updates from its CCG members, the discussions have yielded the following principles as indicators of success for this effort. We share these for visibility noting that when the recommendations come to the full Board for consideration, these provide an indication of areas the Board will be looking at.

1. As the Structural Review is a new and potentially complex mechanism, the Board believes it is critical for this review to be clearly defined. The Board will only be able to consider recommendations where the costs, resources, and impact on all parts of the community can be estimated in advance. For a new and significant mechanism in the ICANN model, the Board will look carefully at the proposed objectives and scope.
2. The Board believes it is essential that groups retain the ability to consider their own structure; necessary intra-group changes should not have to wait for a Structural Review.
3. The Board will consider the rationale provided for the Reviews CCG recommendations, in particular for how the recommendations reinforce and serve the purpose of ICANN's accountability overall. The Board envisions a fit-for-purpose Reviews system as a collective analysis of ICANN's accountability, rather than a series of activities for one part of the community to act on another. The Board also notes that this lens does not assume that processes for looking at collective accountability in future Reviews must take similar forms as in past Reviews.
4. In seeking to confirm that each recommended activity has a stated purpose in support of ICANN's accountability, the Board is also mindful that recommended Reviews not be duplicative of existing mechanisms,

such as the processes for development and approval of ICANN's Strategic and Operating Plans. The Board here recalls the community feedback on avoiding "reviews for reviews' sake" and the interest in establishing a system from first principles.

5. The Board underscores that the purpose of Reviews is not to replace or change the current corporate governance structure of ICANN, the oversight role of the Board, or the organizational structure pertaining to staffing or other operational areas.
6. The Board will be seeking to confirm that each of the recommended review activities has an appropriate and inclusive form of scoping, including the Board and org in their respective roles and any external perspective or expertise where appropriate. The Board would expect to carefully consider the scoping process from its fiduciary standpoint as well.
7. The Board will be looking at the CCG recommendations as a whole to understand the proposed cadence of Review activities, and whether the recommendations establish predictability with sufficient flexibility to adapt to changed circumstances. The Board will be interested in understanding the cross-community resource demand for the overall system, and whether that is compatible with continuing to deliver ICANN's mission.

With these principles in mind, the Board offers the following observations on the Refined Outline:

### **General Input (Principle 7)**

- The Board understands that the individual elements of the Reviews system are still being developed and expects there will be a point at which it will be possible for the community and Board to examine the recommended system as a whole.
- The Board is appreciative that resourcing and bandwidth across ICANN is being considered in the CCG's proposals. The Board views resourcing not only as a matter of budget required to staff and support a Review, but also a matter of what volunteer resources across the community can support in a given period, including those community resources involved in implementation. The Board expects the recommended Reviews system to enable collaborative planning for review activities (scoping, execution, and implementation) in a transparent and responsible manner.

- The Board is encouraged that the CCG is spending significant time discussing the respective roles of SOs, ACs, and the ICANN Board and Organization in the new Reviews system, including in activities such as chartering, scoping, conducting, and implementing a Review, noting that some of these aspects are still being worked out.
- Based on the Refined Outline, the Board understands it may play multiple roles in the recommended Reviews system, including participating on the scoping group and the actual group (CCG) doing the review, as well as having the responsibility to consider the Review recommendations. The Board views itself as a stakeholder and agrees it should participate in the process as currently envisioned.

#### **Purpose of Reviews (Principles 3, 4, 5):**

- The Board supports a straightforward statement of purpose and believes the purpose stated in the outline provides this.

#### **Accountability & Transparency Review (Principles 3,4,6)**

- For the new proposed Accountability and Transparency Review, the Board suggests that the Reviews CCG include a description for the community of how this review is similar to and how this review differs from today's Accountability and Transparency Review.
- On the notion of accountability and transparency, the Board would reiterate that it should not be seen as isolated to that particular review. Rather, the Board would like to see clear articulation of how accountability and transparency is being reinforced in each recommended review activity.

#### **Structural Review (Principles 1,2,3,4,5)**

- The Board is grateful for the significant discussions the CCG members have had to consider the issues raised relating to the Structural Review topic and how those might translate into objectives for a new kind of review in this area.
- The Refined Outline does not define the term “structural review.” While the outline generally describes the recommended structural review as a review of the components of ICANN and how they fit together, it will be important to understand the full scope of the proposed review, and to make explicit what it is and is not, i.e., that the Structural Review is not a review of the fitness of ICANN’s corporate structure.
- The Board believes some clarification is needed as to the intended interaction of the structural review with existing mechanisms for groups to make internal changes to their structure or operations. In line with the general intent to establish clear lines from the purpose of each recommended review to

supporting ICANN's accountability, the Board encourages further definition of how the Review activities being proposed work with what already exists (ICANN Bylaws Sections 12.1 and 11.5 on creation of Advisory Committee and Stakeholder Groups) or a clear statement as to changes that are needed with an appropriate supporting rationale. To the extent a Structural Review is envisioned to supplement or address gaps in existing procedures, the Board suggests that the CCG proposal further focus on what is missing from existing mechanisms and how a proposed Structural Review targets those gaps.

- The Board does not expect the Reviews CCG to solve all structural questions via recommendations for a Structural Review; however, the Board considers it important for clear definition of both the proposed review mechanism and its scope and objectives to identify gaps and areas where more discussion is needed. Among the challenges to the efficacy of previous efforts in the Pilot Holistic Review was a lack of alignment among stakeholders on the purpose, scope, and objectives of the Holistic Review as recommended by the Third Accountability and Transparency Review (ATRT3).
- Regarding the structural review's current proposed formulation, the Board is concerned about the risk of capture if this is conducted with a working group open to anyone. To avoid creating this susceptibility, the Board suggests tightening the Review methodology based on clear representation and accountability to stakeholders.

### **Scoping (Principle 6)**

- The Board appreciates the CCG's efforts on scoping of future reviews and notes that it sets out high-level guidance on inclusiveness, accountability, and transparency in the scoping process.
- The Board also notes that it does not expect the CCG to establish a fully detailed scoping process steps and templates as part of its recommendations. The Board appreciates where such elements are delineated as implementation guidance, allowing for flexibility in considering implementation options.
- The Board sees the flexibility of cadence and process for deferral options as a benefit, with the proposed scoping process also an improvement in allowing for collaboration and input to scope a review before it starts. The Board views this as a collaborative process among all stakeholders, including the Board and Organization.

### **On-Demand Review (Principles 3,4,6)**

- The Board appreciates the work on the On-Demand Review element. This helps create flexibility in the cadence and allows the community to come together on

the most important aspects that merit a review with consideration of the resources required.

- The resourcing and feasibility considerations will be particularly important to define for On-Demand Reviews, given that the cadence and subject area needs will be less predictable.
- The Board would find it important to articulate that SO/AC proposals and support to initiate a given review also translates to an agreement to fully commit and participate in the review.