

Review of Reviews CCG

I would like to reiterate my position regarding the cadence of the reviews and the other in which they should be started.

Cadence

When the first draft report was presented by the Chairs to the CCG, the Structural Review (SR) was expected to take almost three years to complete. This was presented as the rationale for establishing a 15-year cadence for the review.

In the new draft, however, the estimated duration of the Structural Review has been reduced to 18 months, while the 15-year cadence remains unchanged. I believe this change warrants reconsideration. If the duration of the review has been substantially reduced, the rationale for maintaining such a long interval between reviews should also be reassessed.

Both the Accountability and Transparency Review (ATR) and the Structural Review are now expected to take approximately 18 months. Given that they have the same estimated duration, I believe there is a strong case for establishing the same cadence for both reviews.

The draft also proposes a three-year interval between the two reviews. I do not believe this separation is necessary. The two reviews address fundamentally different areas, and there is no apparent reason why the recommendations arising from one review would need to be fully implemented before the other review can begin. In fact, delaying the initiation of one review until three years after the completion of the other could unnecessarily extend the overall review cycle and delay consideration of issues that may require attention.

Nevertheless, if the proposed three-year separation between the reviews is retained, I would suggest applying a consistent six-year cadence to both reviews. Under this approach, each review would be initiated three years after the start of the preceding review, alternating between the ATR and the SR.

This approach would provide a predictable and balanced review cycle while avoiding unnecessary gaps between reviews. It would also ensure that both types of review receive comparable treatment and that the overall review framework remains responsive to ICANN's evolving needs.

First Review

I strongly support the ISPCP position, expressed in several previous comments, that the Structural Review should be the first review to be initiated. The SR has implications for the effectiveness and relevance of other reviews and, for that reason, should precede them.

As the ISPCP has previously stated:

It is the view of the ISPCP that any delay in initiating a structural review of the organization, particularly given that such a review has never been undertaken since ICANN's formation nearly 30 years ago, and recognizing that the Internet of today is fundamentally different from the Internet of those early days, will subject ICANN to increasing levels of risk.

It is the view of the ISPCP that proceeding with specific reviews before first considering ICANN's overall structural fitness risks limiting the effectiveness and relevance of those efforts. Ensuring that ICANN is agile, capable, and prepared to address future challenges, rather than remaining

dependent on a structure designed to address the challenges of the past, should be treated as an immediate priority.

For these reasons, I believe the Structural Review should be launched first. Establishing whether ICANN's current structure remains fit for purpose should provide an essential foundation for subsequent reviews and help ensure that their recommendations are relevant to the organization ICANN needs to be in the future, rather than primarily addressing structures and assumptions inherited from the past.

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