

● **3 August 2026**

ICANN Public Comments
Submitted electronically

Subject: auDA comment on the Review of Reviews Cross-Community Group draft report

● The .au Domain Administration Limited (auDA) acknowledges members of the Review of Reviews Cross Community Group's (CCG's) for their work in assessing ICANN's current system of reviews against their intended purpose of supporting ICANN's accountability, transparency and effectiveness.

Mechanisms for efficient, effective and timely self-review are critical to the ongoing legitimacy of the multi-stakeholder Internet governance model, and auDA welcomes the CCG's draft report setting out a refreshed framework for reviews that will help to strengthen this. Overall, we are supportive of the CCG's proposals. However, we have some suggestions for further improvement, which are summarised at the end of this document. We also offer the following comments for consideration:

Reviews Scoping Committee

We support the proposal to establish a standing Reviews Scoping Committee to scope and plan each review prior to each review. We believe a committee comprised of SO/AC leadership, who are elected by their communities, as well as representatives from ICANN staff and Board will enhance accountability and transparency. It will also increase efficiency of reviews and allow review teams to be assembled according to the requirements of each review.

Refreshed reviews system

We support the proposed three-pillar framework comprising of periodic Accountability and Transparency Reviews and Structural Reviews as well as On Demand reviews for issues that are either urgent or do not fit into the other categories.

We consider the proposed cadence of every 5 years for Accountability and Transparency Reviews and every 15 years for Structural Reviews to be appropriate. We also support the proposed processes for scoping and deferring reviews (including thresholds for and limitations on deferral), and the 12-month period for final reporting on reviews.



The draft report proposes that each Community Review Team would be comprised of 3 representatives from each SO/AC, ICANN Org, and ICANN Board, with any unfilled seats left vacant. This will lead to a very large review team. We **suggest** a maximum of two participants per SO/AC (or one participant and one alternate) for each Community Review Team be considered instead.

While we recognise the importance of each SO/AC being adequately represented, we also note that beyond a certain size, group decision-making can become cumbersome and time consuming. We believe it is important to strike the right balance between representation and ensuring the efficiency and effectiveness of each review, and that a more streamlined review team could best meet this objective within the proposed 12-month review period. Irrespective of a review team's size or composition, each SO/AC should have only one vote.

Implementation

auDA welcomes the CCG's emphasis on improving implementation and we support the proposals to streamline and strengthen this. Chronic delays in implementing recommendations of reviews are not just inefficient, they erode the accountability that ICANN's legitimacy depends on.

We support Review Teams remaining active until the Board acts on their final report, and introducing a mechanism to input expert advice during implementation via Implementation Review Teams such as those used in the policy development context. We also support retaining the Bylaws requirement to take action on a review's final report within 6 months.

auDA considers prioritisation of recommendations to be a key element in strengthening the implementation process and we **suggest** that the CCG consider introducing a mechanism to facilitate this. For example, the Reviews Team could make recommendations in their final report, or priorities could be agreed in conjunction with the Implementation Review Team.

While recognising that authority for final decisions rests with the Board, auDA considers the Board should be required to engage with a Review Team before rejecting any recommendations in its final report.

Since the draft report foreshadows that Bylaws amendments will be necessary to reflect the refreshed framework, we **suggest** the CCG could consider how to establish a Bylaws requirement similar to the requirement to try to reach a mutually acceptable solution before rejecting GAC advice.



Summary of auDA suggestions

- Reduce the number of participants from each SO/AC, ICANN Org and ICANN Board from 3 to 2 (or 1 participant and 1 alternate). This allows for adequate representation while maximising the working efficiency of a Review Team. For any situations requiring a vote, each SO/AC should have a single vote regardless of the number of representatives.
- The CCG could consider a prioritisation mechanism through which a Review Team could prioritise recommendations, either as part of its final report or in conjunction with the Implementation Review Team and/or Review Scoping Committee).
- The CCG could consider a requirement for the Board to consult and try to reach agreement before rejecting a recommendation of a Review Team.

We thank you for considering this input. If you have questions or would like to discuss any part of this submission, please contact auDA's Internet Governance team at internet.governance@auda.org.au

Yours sincerely

Dr Bruce Tonkin
Chief Executive Officer