

22 September 2025

ICANN Public Comments
Submitted via email

Subject: auDA comment on the Governance Structure proposal – Root Server System Governance Working Group

The .au Domain Administration Limited ([auDA](#)) is pleased to offer this response to the *["Functional Model for Root Server System Governance" \(Public Comment proceeding\)](#)*.

auDA is the country code top level domain (ccTLD) manager for the .au ccTLD, operating under [Terms of Endorsement](#) from the Australian Government.

Under the governance structure (GS) [described in the Functional Model](#), auDA would be part of the ccTLD Participating Stakeholder Community, and as such values the opportunity to share some thinking to shape the GS as it is brought towards implementation.

More information about auDA is included in **Appendix 1: About auDA**.

General comments

auDA thanks the volunteers who have developed the Functional Model (FM). It is evident that considerable effort over time has been devoted to developing the thinking the Root Server System Advisory Committee (RSSAC) shared in earlier papers including [RSSAC37: A Proposed Governance Model for the DNS Root Server System](#).

The elaboration of the [Governance Principles](#) to ground the GS, and then development of the phased approach to implementing the GS, is a significant body of work.

After reviewing the FM, auDA offers these overarching comments:

- The FM offers an improvement over the status quo, where there is no governance framework in place for the root server system, a critical service for the free, open, secure and global Internet.
- The key objectives of the FM must be to support the evolution of the root server system, and to protect it from risks of disruption by malign actors – who could be members of any stakeholder group, or emerge from any jurisdiction.



- The set of Participating Stakeholder Communities the FM proposes appear to be appropriate, as the key direct users vitally dependent on the reliable operation of the root server system.
- The functional responsibilities set out in the FM appear to us to all be necessary, and together to form a complete system for the ongoing governance of the root server system.
- Our general view is that the FM appears to adequately meet the framework set out by RSSAC in [*RSSAC058: Success Criteria for the RSS Governance Structure*](#) to test its suitability.
- It is not possible to know how the needs for and of the system will evolve over time. As the FM is finalised, it will be important to ensure that:
 - Existing operators and stakeholders cannot block the implementation of new technologies or operational approaches that could, for instance, require more or fewer RSS operators.
 - The governance structure itself can evolve over time.
 - RSS operators cannot require financial contributions from other parties, including Participating Stakeholder Communities (or subsets thereof) that are active in the GS, without their ongoing consent.
 - The ongoing need to ensure that diversity in the governance and operation of the RSS is not rendered impossible by inappropriately constitutionalising the current set of operators or discounting a range of standard diversity factors in determining which organisations should be operators.

Areas where greater clarity is sought

auDA suggests the following matters could benefit from greater clarity in the finalisation of the FM and planning for its implementation:

- **Risk management responsibilities** – auDA regards the risk management elements of the proposed FM as critical to its success. One key risk that must be managed is succession planning within RSOs, but there is also a broader issue of systemic understanding of the risk picture facing the root server system and how risks are managed.
- **The role of finance for the operators** – are all their costs expected to be able to be met by finance from the GS? If not, where are the limits to the cost contributions expected?
- **The empowerment of the governance structure** – on what authority will the FM's proposed empowerment of the GS to determine organisations' ability to become or to stop being operators?



- **The relationship with the RSSAC** – the question of whether both the proposed GS and the RSSAC are required is left open. auDA suggests a clearer intended direction for this discussion is included in the next iteration of the plan.

auDA has not developed a detailed assessment of the FM nor developed alternative approaches. As such, this Public Comment contribution does not include an auDA opinion about the overall strength of the model or whether other alternatives would be preferable.

We thank you for considering this input. If you would like further information or to discuss any aspect, please contact auDA's Internet Governance team by email: internet.governance@auda.org.au.

Yours sincerely

Dr. Bruce Tonkin
Chief Executive Officer



Appendix 1: About auDA

The .au Domain Administration Limited ([auDA](#)) is the trusted administrator of the .au country code Top Level Domain (ccTLD). The .au ccTLD is part of Australia's critical infrastructure, supporting more than 4.2 million .au domain names. auDA is endorsed by the Australian Government to administer the .au for the benefit of all Australians under its [Terms of Endorsement](#).

As a critical part of the digital economy, auDA's role is to ensure the .au ccTLD remains stable, reliable and secure. This means auDA is a key stakeholder in the stable, reliable and secure operation of the internet's root zone system.

Additionally, auDA performs the following functions:

- Administering a licensing regime for .au domain names based in multi-stakeholder processes, including:
 - Developing policies for the .au domain with a multi-stakeholder approach to provide the greatest benefit for the Australian community
 - Managing enquiries from the public about the .au Licensing Rules
 - Maintaining an appropriate compliance and dispute resolution process associated with the .au Licensing Rules
 - Making limited information available on the holder of a domain name licence through a publicly accessible tool at <https://whois.auda.org.au/> (a standard feature of domain name systems around the world and an essential element of online accountability)
- Accrediting registrars to provide domain name registration services to the Australian internet community
- Advocating for, and actively participating in, multi-stakeholder internet governance processes both domestically and internationally.

In performing its functions, auDA operates under a multi-stakeholder model, working closely with the technical community, suppliers, business users, industry, civil society, consumers and the Australian Government.