

RIR Governance Document Version 3: Summary of Differences and Rationale for Changes

The Number Resource Organization Number Council (NRO NC) handed over the third version of the draft RIR Governance Document to the NRO Executive Council in July 2026. This summary provides an overview of the major differences between versions 2 and 3 of the document and explains the rationale for those changes.

Version 3 reflects the feedback received through the RIR consultation and ICANN Public Comment process held from 28 August to 7 November 2025, as well as subsequent drafting workshops and discussions. Following an in-person workshop in Montevideo, Uruguay, the NRO NC continued developing the draft, met during ICANN 85 in Mumbai in March 2026, and held a final workshop in Seville during ICANN 86 in June 2026 to review and finalize the document. Throughout this process, the inventory of issues identified by the community was presented and progress on their resolution was reported through meeting and webinar presentations, as well as two published status reports.

The key changes in version 3 include:

- Clearer definitions and decision-making provisions, including new or amended definitions for Audit, Compliance Review, Rehabilitation Plan, Temporary Emergency Continuity Arrangement, Temporary Emergency Operator, and Transition Plan.
- A restructured Recognition process, with more detailed proposal and review requirements, a two-thirds RIR support threshold, conflict-of-interest disclosure, clearer ICANN responsibilities, and greater transparency through the publication of assessments and rationales.
- Clarifications to Service Region, Coordination Limitation, and Community Consultation provisions to improve readability and explain how consultation may occur during Recognition or Derecognition processes.
- A revised audit and compliance framework, including a five-year regular audit cycle, a distinct Compliance Review process with safeguards against misuse, and clearer outcomes and follow-up through Rehabilitation Plans where needed.
- Updated emergency continuity provisions, including terminology changes, the ability for an affected RIR to initiate a Temporary Emergency Continuity Arrangement for its own services, a lowered initiation threshold involving ICANN and two-thirds of the RIRs, a retained 90-day limit, and additional transparency safeguards.
- A more detailed Derecognition process that emphasizes rehabilitation as the preferred path, aligns key steps with the Recognition process, clarifies ICANN's review and decision-making role, requires publication of decisions and supporting documents, and applies a two-thirds RIR support threshold excluding the subject RIR.
- New amendment safeguards that prevent the document from being amended during a Temporary Emergency Continuity Arrangement or while a proposal for Derecognition is pending.

By setting out these changes and the accompanying reasons, the NRO NC hopes to help readers understand the major considerations weighed in developing version 3 and how the draft seeks to address the main community concerns during the feedback process. This Summary also explains why certain suggestions, while thoughtful and valuable, were not incorporated into this draft.

Sincerely,
The NRO NC

Preamble:

Minor editorial changes.

Article 1.1: Definitions

The following definitions have been added or amended to provide clarity:

- ASO
- Audit
- Compliance Review
- Notice of Pending Derecognition
- Notice of Pending Recognition
- Rehabilitation Plan
- Temporary Emergency Continuity Arrangement
- Temporary Emergency Operator
- Transition Plan

The following definitions have been deleted:

- Dissenting RIR
- Objection

Article 1.4

This article has been added to clarify that entities under this Document should make decisions as per their relevant procedures including the ability to appeal or challenge decisions via such procedures.

Article 2.2 Service Region

Changes: The text has been amended with the addition of the text “geographically continuous area of substantial scale, comprising many distinct jurisdictions,” to provide clarity.

Rationale: The text is in line with the Article 2.3 Coordination Limitation, which tries to balance meeting future needs with limiting the coordination burden of the Internet numbers registry system to ensure efficiency.

Parts of Article 2.3 Change to RIR Status (Version 2)

Changes: This section has been removed and reorganized. Parts of Article 2.3 (a) and (b) can be found under Article 3. Recognition and Article 6. Derecognition. The Recognition and Derecognition processes as a whole have been amended, with each being described in more detail in the respective sections. Article 2.3 now refers to Coordination Limitation.

Rationale: We received feedback that the document was difficult to read as similar issues were covered in multiple articles. Recognition and Derecognition are each covered in separate Articles. We have aimed to improve the flow of the document by removing references to the Recognition and Derecognition processes in Article 2.

Article 2.7 Community Consultations

Changes: This article has been added in v3.

Rationale: There were comments that it was unclear when stakeholders would be consulted in the Recognition and Derecognition processes. We clarified that this document in no way prevents or obliges any organization, whether an RIR or ICANN, from carrying out a community consultation when assessing a proposal for Recognition or Derecognition.

Article 3 Recognition

This article has been redrafted to include text that was part of Article 2.3 Change to RIR Status (a) Recognition in version 2 of this document. Further, the Recognition process itself has been changed:

- The threshold for recognition requires support by at least two-thirds of the RIRs
- There are provisions to account for conflicts of interest, as well as input from potentially affected RIRs
- Since the threshold has been lowered from unanimity minus one in version 2, there is no longer a need to have a third-party review mechanism (Recognition Review in version 2 of this document)
- The process allows for RIRs to provide more substantial input to Candidate RIRs and for the Candidate RIR to modify or improve its proposal
- All major steps require the publication of assessments with an accompanying rationale to ensure transparency for the communities involved

3.2 Proposal

Changes: New text outlining the requirements for Candidate RIRs when submitting a proposal.

Rationale: The text provides clarity on the requirements for a proposal by an entity that would like to be recognized as an RIR. It also creates transparency as ICANN and the RIRs are obliged to publish a notice when a proposal for recognition is received.

3.3. RIR Review

Changes: The criteria listed under Article 3.3 (a) (i) (ii) and (iii) were previously under Article 2.3 (a) (ii) A, B and C in version 2 of the document. Article 2.3 (a) (ii) D in version 2 has been listed as 3.1 (f) Improvement in this version.

Article 3.3 (b) Submission is a new section. It clarifies that RIRs need to assess the proposal against specific criteria and provide a justification for their assessment.

Further, Article 3.3 (b)(iii) also requires RIRs to identify possible conflicts of interest in relation to the proposal.

Rationale: The process now provides room for information to be gathered by the RIRs and to carry out due diligence on the governing body of the Candidate RIRs. There is greater transparency in the assessment process as the RIRs are each required to provide to ICANN their assessment of the proposal, their questions to the Candidate RIR, and responses received. The identification of actual or possible conflicts of interest also provides greater accountability in the process.

3.4 ICANN Review

Changes: This section has been added to the document to outline ICANN's role and actions in the Recognition process

Rationale: There was a need to better outline the role played by ICANN in the Recognition process. In this process, ICANN reviews the assessments submitted by the RIRs, publishes the proposal for recognition for transparency, and may request RIRs to reconsider their assessments. ICANN may also make its own enquiries of the Candidate RIR.

3.5 Modification

Changes: This section has been added to the document. It provides the possibility for a Candidate RIR to modify its proposal.

Rationale: There is a need to balance the Recognition process with the ability to make improvements based on the input shared by the existing RIRs. This section gives the Candidate RIR the opportunity to make improvements to their proposal based on the assessments received. The RIRs might have raised valid concerns in their assessments, which the Candidate RIR should be allowed to address within reason. However, if there are material changes to the proposal, it will need to be assessed afresh.

3.6 ICANN Decision

Changes: This section has been renumbered. It was previously Article 2.3 (c) in version 2 of this document.

Rationale: Restructured for improved flow.

3.7 ICANN Limitations

Changes: Renumbered from Article 2.3 (c) (iii) in version 2 of this document.

The recognition threshold has been changed to support from two-thirds of the RIRs, excluding those RIRs whose Service Region or revenue would be materially impacted.

Rationale: There were several discussions on whether the thresholds and processes in version 2 of the document were adequate to accommodate a range of scenarios including those in which more than one RIR could have a conflict of interest or if an RIR was unable to provide an assessment. There was agreement that the process should require a two-thirds majority rather than unanimity or unanimity minus one.

The other part of the discussions was centred around defining conflicts of interest. While all RIRs are required to declare any actual or perceived interests in the process as part of their assessment, for the purposes of determining the thresholds for Recognition, conflict of interest is defined as a material impact on the Service Region or revenue of an RIR. This is important to balance the openness of the Recognition process with the stability of the overall RIR system. Further, the input of the RIRs that might be materially impacted should still be considered by ICANN on an informational basis. Additionally, ICANN is required to notify any RIR that it might exclude on the grounds of materiality and provide a justification for the exclusion from the decision threshold.

3.8 Effect of Recognition

Changes: Renumbered from Article 3.2 in version 2 of this document and minor editorial changes.

Rationale: Improved flow and readability of the document.

4.1 Operational Requirements

Changes: We made the following edits:

- 4.1(k) Transparency: Now explicitly mentions the “Numbering Community”
- 4.1(m) Continuity: Change in terminology from “Emergency Operator” to “Temporary Emergency Continuity Operator”
- 4.1(p) Confidentiality: Clarifies that non-public information may be shared among RIRs and ICANN if required by this document and in line with applicable laws
- 4.1(q) Dispute Resolution: Includes resource holders and potential resource holders among those who can participate in dispute resolution

Rationale: These edits were made to provide clarity to the requirements.

4.2 Audits and Compliance Reviews

The NRO NC carried out a holistic review of the entire audit process, including regular audits, the process to request an ad hoc audit and the criteria to request an ad hoc audit. The following changes have been made:

- The frequency of regular audits is set to once every five years.
- ‘Ad hoc’ audits have been changed to ‘Compliance Reviews’ to better suit the intention of the review and mechanisms have been added to prevent misuse.
- Three new sections have been added to Article 4.2 - (c) Outcomes, (d) Frequency and (e) Performance to close the loop following an Audit or a Compliance Review.

4.2 (a) Audits

Changes: The frequency of the audits is set to once in five years; it was once in three years in version 2 of this document.

Rationale: Version 2 of the document had set the frequency at once every three years, which was deemed to be too frequent. This could lead to RIRs being continuously under audit, redirecting focus from their core mission. Specific issues identified in the intervening period are still capable of being reviewed under a Compliance Review.

4.2 (b) Compliance Reviews

Changes: Replaces Article 2.4 Ad Hoc Audit in version 2 of this document, with added text. We decided to have a clear distinction between the regular Audit and a Compliance Review. The Compliance Review is a more lightweight process than an audit and aims at the early identification of possible issues an RIR might have in complying with its ongoing commitments under Article 4.1.

- An RIR may request to a review of itself for compliance
- A majority of the other RIRs may initiate a review
- The threshold of members required to initiate a review has been lowered to 1,000 members or 15% of the membership, whichever is lower from the threshold of 2,000 members or 25% of the membership in version 2 of the document.
- ICANN needs to determine whether the issues a review is requested for are material enough to warrant a review
- Members need to demonstrate efforts to have resolved the issues using the RIR's existing mechanisms prior to requesting a Compliance Review

Rationale: A Compliance Review is not a full audit; it has been designed to allow for the quick identification of possible issues with ongoing commitments in between Audit cycles. Therefore, there is a lower threshold to request a Compliance Review. Consequently, there is a need to balance the ability to request a Compliance Review against the possibility of misuse. Hence the following safeguards have been introduced:

- Members of an RIR must have made efforts in good faith to resolve their concern through the existing mechanisms of the RIR in question prior to initiating a Compliance Review
- The requesting party should specify for which provisions of the RIR Governance Document they are requesting a Compliance Review
- Any party requesting a Compliance Review must demonstrate that the issue giving rise to their request represents a material issue of sufficient urgency that cannot await the next regular scheduled Audit of the RIR in question

4.2 (c) Outcomes

Changes: This section is a new addition. It requires ICANN to produce a report on the findings of an Audit and if needed, work with the RIR to develop a Rehabilitation Plan. ICANN is further obliged to follow up with the RIR in question to verify that the Rehabilitation Plan has been completed.

Rationale: This text logically closes the loop after an Audit or Compliance Review. No action will be needed if an RIR is compliant. However, if there are compliance issues, it ensures transparency and provides a path for follow-up actions. The Derecognition process in Article 6 reinforces this by requiring that a Rehabilitation Plan and opportunity to cure is provided to the subject RIR prior to ICANN making any decision to Derecognize an RIR.

4.2 (d) Frequency

Changes: This text is a new addition. It prevents repeated action against the issues that are already identified and in the process of being addressed and limits the number of reviews that can be initiated between two audits.

Rationale: This text aims at preventing paralysis of an RIR by tying it up in endless reviews and staying true to the aim of Compliance Reviews, which is to improve compliance.

4.3 (e) Performance

Changes: This section has been added to the document. It states that ICANN or a party authorized by ICANN may carry out Audits and Compliance Reviews.

Rationale: By adding this text, we clarify that ICANN is responsible for ensuring the Audits and Compliance Reviews are carried out.

5.1 Emergency Continuity

Changes: This Article has been revised with the following changes:

- The terminology has been changed from “Emergency Continuity Operator” to “Temporary Emergency Continuity Operator”
- 5.1 (a): This text has been added to state that an affected RIR can initiate a Temporary Emergency Continuity Arrangement for its own services
- 5.1 (b): The threshold to initiate a Temporary Emergency Continuity Arrangement has been lowered from unanimity to ICANN and two-thirds of the RIRs
- 5.1 (c): The time limit has been retained at 90 days. This was previously under Article 5.1 (d) in version 2
- 5.1 (d): Previously numbered 5.1 (b) in version 2 of this document. Text has been added to clarify that the RIRs and ICANN may choose to make additional efforts to engage with the affected community
- 5.1 (e): Editorial changes
- 5.1 (f): Clarifies that the scope may be increased or decreased

Rationale: We reviewed the purpose and processes for emergency operations. Some considerations that led to the changes were the need to ensure that the process was agile enough to respond to emergencies, for example, an RIR can trigger a continuity arrangement for itself, something that might be needed in case of a natural disaster. Lowering the threshold to initiate an Emergency Temporary Continuity Arrangement also allows for a quicker response time. However, we also retained the 90-day limit to ensure that a temporary arrangement does not become the default mode of operation. Further, community engagement where possible and the publication of a report aim to provide transparency.

6. Derecognition

6.1 Possibility of Derecognition

Changes: Adds text "and despite having been afforded a reasonable opportunity to remedy such failure through the applicable compliance and rehabilitation processes, remains materially non-compliant."

Rationale: Derecognition should be the last resort. Therefore, text has been added to ensure that all reasonable efforts have been made to rehabilitate a non-compliant RIR.

6.2 Rehabilitation

Changes: The text now explicitly mentions a Rehabilitation Plan and requires ICANN and the RIRs to work with a non-compliant RIR to aim to bring it back on track prior to taking any further action.

Rationale: The text was added to provide consistency by mentioning the Rehabilitation Plan as a distinct step and further ensures follow up actions after an Audit or Compliance Review.

6.3 Proposal for Derecognition

Changes: No changes to the text. This Article has been renumbered; it was under Article 2.3(b)(i) and (ii) in version 2 of this document.

6.4 Publication and Response

Changes: No changes to the text. This Article has been renumbered; it was under Article 2.3(b)(iii) in version 2 of this document and references to other parts of the document have been updated.

6.5 RIR Review

Changes: This Article has been renumbered; it was under Article 2.3(b)(iv) Consideration in version 2 of this document. This version of the document goes into greater detail on the steps to be taken after a proposal for Derecognition has been received:

- In addition to their assessments, RIRs are expected to provide any questions they may have asked the subject RIR regarding the proposal for Derecognition and responses received.
- Identify and declare any existing or possible conflicts of interest

Rationale: These changes align the steps of the Derecognition process with that of the Recognition process. Further, they aim to provide transparency regarding the assessments made and possible conflicts of interest.

6.6 ICANN Review

Changes: This Article has been added to this version of the document:

- It outlines the steps that ICANN should take in the Derecognition process.
- It allows ICANN to request RIRs to review their assessments and make its own enquiries.
- The text again emphasizes the need to work towards rehabilitating and curing non-compliance over proceeding to derecognition and for further review following a Rehabilitation Plan.

Rationale: Article 6.6 clarifies ICANN's role and responsibilities in the Derecognition process. The focus remains on providing support to cure non-compliance over moving forward with Derecognition.

6.7 ICANN Decision

Changes: This Article has been added to this version of the document:

- The Derecognition process is more aligned with the Recognition process.
- ICANN is obliged to publish its decision with the accompanying documents, including a Transition Plan if a proposal for Derecognition has been approved.
- The proposal for Derecognition can only be approved by ICANN if it is supported by two-thirds of the RIRs, excluding the RIR that is the subject of the Derecognition proposal.

Rationale: The Recognition and Derecognition processes have been more closely aligned, including the use of a two-thirds approval threshold. This change reflects the need for consistency between the two processes while recognizing the practical challenges RIRs may face when making a derecognition recommendation. Conflict of interest disclosure remains important for transparency, but in the Derecognition process, greater decision-making control remains with the RIRs given the seriousness of the outcome.

6.8 Effect of Derecognition

Changes: No changes to the text. This Article has been renumbered; it was Article 6.3 in version 2 of this document.

6.9 Readiness

Changes: Text edits to ensure consistent terminology across the document; the Article has been renumbered from 6.4 in version 2 of this document.

7.2 Conditions

Changes: New text. This Article prevents the amendment of this document under certain circumstances — it may not be amended during a Temporary Emergency Continuity Arrangement or when a proposal for Derecognition is pending.

Rationale: The aim of this provision is to prevent hasty changes to respond to particular circumstances or to water down requirements at difficult moments.

7.3 Rectification and 7.4 Periodic Review

Changes: These Articles have been renumbered from 7.2 and 7.3 in version 2 of this document respectively.