

Preliminary Assessment: Readiness to Implement the Draft “RIR Governance Document”

<https://www.nro.net/policy/internet-coordination-policy-2/rir-governance-document/>

Introduction

This preliminary assessment of the draft RIR Governance Document has been carried out by the five Regional Internet Registries (RIRs) to give the RIR communities an idea of the accompanying implementation documents that will be developed once the final version of the document has been adopted, which will contain most of the necessary operational details.

This is a preliminary assessment. Each RIR will be expected to carry out its own detailed assessment once the document has been adopted. Please also note that while the RIRs offer a range of services to their members and communities. For the purposes of this assessment, only the ‘RIR Services’ as defined in the document¹ are considered to be in scope.

Article 3: Recognition / Article 6: Derecognition

The draft document formalises the processes for the potential **recognition** of new RIRs and the potential **derecognition** of existing ones. It requires the RIRs to make recommendations for or against such proposals, which each RIR will publish together with its reasons for doing so.

Each RIR will therefore need to define the basis on which it will evaluate such proposals, such as listing the criteria upon which the evaluation can be performed and identifying an appropriate decision-making process. Each RIR will need to develop internal procedures to manage how it evaluates a proposal and publishes its decision.

3.2. Effect of Recognition / 6.3. Effect of Derecognition

In the case of a new RIR being recognised or an existing one being derecognised, one of the existing RIRs would need to hand part (or all) of its services to another organisation. This would be a highly complex process from a technical, operational and legal point of view, and would require extensive preparations, including a coordinated live hand-over to avoid operational impact. More on this can be found below under **Article 5: Emergency Continuity**.

¹ As defined in Section 1.1 of the Document, ““RIR Services” means the delegation of Number Resources and the set of services necessary to ensure that Resource Holders are able to use Number Resources and the Numbering Community is able to obtain accurate information about which Number Resources are held by which entities, including allocation, registration, and directory services as well as related technical services.”

Article 4: Ongoing Commitments

The RIRs have confirmed their ability to meet the ongoing commitments defined in the document. For the most part, these constitute regular RIR operations. However, as per the draft document, each RIR will need to **visibly demonstrate its compliance**. This will require the development of additional documentation (for example, to demonstrate in an auditable fashion that an RIR applies its own policies in a consistent and impartial manner). This may be part of the Implementation Procedures referenced in Section 1.3 in the Document.

4.2. Audit

The scope of the periodic audit will need to be further defined. RIRs will need to define a procedure to comply with periodic and ad hoc audits. Additionally, the nature and scope of the audit activity will require further detailing in the Implementation Procedures, in accordance with Section 1.3 in the Document.

Because the RIRs may (by unanimous agreement) request ICANN to conduct an ad hoc audit of another RIR, each RIR will also need to define the appropriate decision making process for such a request.

Article 5: Emergency Continuity

Version 2 of the document requires that an ‘Emergency Operator’ be able to assume the provision of RIR services in the event that an existing RIR is unable to do so. As mentioned above, this will be a highly complex process from a technical, operational and legal point of view and will require significant effort from the RIRs and incur a financial cost.

While each RIR may have its own individual business continuity procedures to maintain the availability of its services, they will also need to identify and onboard a suitable entity to fill this ‘Emergency Operator’ role. Such an operator would need to have access to, or else be able to receive a large quantity of registration data and related information in a legally compliant way. While the specifics vary between RIRs, this data may be spread across multiple operational systems, parts of which may be subcontracted to external parties. Finally, in areas where the RIR acts as a unique and authoritative source, such as RPKI or reverse DNS, this would require a carefully coordinated live hand-off to avoid operational impact.

With the above in mind, each RIR will need to identify and onboard a suitable third party that is capable of undertaking this function. They will need to set up and test the relevant systems, share records, data, and other information, and ensure the appropriate processes and agreements are in place.

6.2. Rehabilitation

The Document aims at rehabilitating a non-compliant RIR as far as possible. Therefore, with respect to this section, the NRO will need to develop processes an RIR can use to request support from other RIRs in case of non-compliance. Similarly, the NRO and/or RIRs will need to evaluate the extent to which they can accommodate such a request and provide support.

7.2 Periodic Review

The NRO will need to ensure that it will consider whether the document needs to be reviewed at least once in five years. A process will need to be developed to make this assessment.

Implementation Procedures

In light of the above, we expect that the Implementation Procedures described in Section 1.3 will need to address the following aspects:

- The details of the procedure for recognition/derecognition of RIRs
- Requirements for RIRs to visibly demonstrate compliance with their operational requirements as described in the document
- Scope and procedures for periodic and ad hoc audits
- The procedure for the Periodic Review requirement described in Section 7.3
- A process for the assessment of the need of a review of the RIR Governance Document every five years

Procedures developed by the RIRs, individually or collectively as the NRO, will include the following aspects:

- Decision-making process for initiating or providing recommendations to proposals for the recognition/derecognition of RIRs
- The creation of a technical, administrative and legal framework for the engagement of an Emergency Operator, and for the stable handover of services to such an operator or successor RIR
- The creation of a process that would facilitate the rehabilitation of another RIR

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