Internet Corporation for Assigned Names and Numbers
Root Server System Governance Working Group

Our ref: 25-046

Netnod welcomes the opportunity to provide feedback on the Root Server System Governance Structure document produced by the Root Server System Governance Working Group (RSS GWG).

Netnod offers the following commentary:

- Accountability and transparency of that accountability vis a vis the global community, be it individuals, states or corporations, is not discussed in depth.
  Netnod is of the opinion that the longevity of the governance structure for the root server system is closely linked to its acceptance in the wider global context.
- Actual implementation of control mechanisms related to adherence to governance principles are left until a later stage.
  Netnod believes that implementational issues might be cause of concern down the line, and as such constant iteration between principles, models and implementation is needed going forward.

Netnod welcomes and supports the work done by the RSS GWG and its adherence to the multi-stakeholder model as a foundational approach for Internet coordination and governance.

Please see the attached for further motivations and elaborations.

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Attachment 1 - Detailed comments

1. Netnod's role and the broader context

Netnod is a for-profit corporation wholly owned and controlled by the non-profit foundation *Stiftelsen för Telematikens utveckling (the TU-foundation)*. The TU-foundation works to improve the Internet in Sweden and the Nordic countries through corporate ownership and/or research funding. Netnod is one of the twelve designated root server operators, managing *i-root*. Additionally, Netnod operates internet exchanges in the Nordics, provides global secondary DNS services, and is commissioned by the Swedish state to distribute Swedish time in a GNSS-independent manner.

The RSS GWG has developed a governance structure document (hereinafter referred to as the GS-document), building upon an earlier governance principles document (hereinafter referred to as the GP-document).

Netnod believes that the increasing demands of nation-states and large corporations pose a threat to the Internet's current form. Therefore, governance structures for the Internet and its functions must be meticulously designed, strictly adhering to a multi-stakeholder model.

A guiding principle for this process must be the preservation of a globally unique public name space, which is essential for the Internet to function as a global network. Consequently, special interests must be carefully managed and restrained when designing the multi-stakeholder model responsible for governing the Internet's globally unique public name space, starting with the root server system[1].

2. Accountability and transparency

Netnod asserts that global political and corporate actors with significant influence require reassurance through the accountability and transparency provided by the GS, even if they are not direct constituents. It must be unequivocally clear to external observers that the root server system functions effectively and possesses robust accountability mechanisms.

Netnod's concern about accountability directly relates to the *'Sufficiently well self-identified and organized'* criterion as one of two criteria for inclusion in the GS:
- [have a] direct operational dependency on the RSS
- [is] sufficiently well self-identified and organized

Netnod is of the opinion that some global political and corporate actors wield such influence that they too must be satisfied by the accountability and transparency offered by the GS, even if they are not a constituent. Netnod agrees with the approach of a very limited set of organizations constituting the GS and concurs with the assumption that TLDs and resolvers are the two primary constituent groups.

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[1] See, for example, RFC 2826 for further motivation on the importance of a globally unique public name space.

The function and operation of the root server system is a global interest, the operation of which must be kept out of special interest groups.

Or in other words, it needs to be abundantly clear for an external observer (also for non-consituents) that the root server system **works _and_ there is accountability in place**.

3. Implementation of structure and organization

As stated in the GS-document, not all Governance Principles (GPs) from the GP-document are enshrined in the GS, as these GPs are to be addressed in later stages of the process. However, Netnod would welcome a more in-depth exploration of how the currently unhandled GPs can be incorporated at a later stage.

Given that this process is iterative, carefully evolving the subject in the best engineering manner, it is anticipated that certain issues or GPs will be advanced until they can be readily managed. Some issues are indeed best handled in this way. Other issues, however, require immediate attention as they can influence future decisions.

One such critical issue is the organizational form of the GS.

Further work must address and rationalize the actual implementations of the GS, including but not limited to its organizational form, jurisdictional considerations, and the constitution and capture of these elements.

4. Concluding remarks

Netnod appreciates the opportunity to provide feedback on the Root Server System Governance Structure document. The longevity of the governance structure is intrinsically linked to its acceptance within a broader global context, thus necessitating an in-depth discussion on accountability and transparency. The actual implementation of control mechanisms related to governance principles should not be deferred; instead, we stress the need for constant iteration between principles, models, and implementation to proactively address potential future concerns.

As the operator of the _i-root_, we perceive the growing demands of nation-states and corporations as a threat to the Internet, thereby underscoring the need for careful design of governance structures. The accountability and transparency of the Root Server System's governance must be evident to external global political and corporate actors, even if they are not direct constituents. Finally, a deeper exploration of how currently unhandled governance principles can be enshrined in later stages of the process, particularly concerning the organizational form, jurisdictional considerations, and constitution of the governance structure, is welcomed as a potential next step.