

EMPOWERED COMMUNITY RECONSIDERATION PETITION

Submitted by the At-Large Advisory Committee
17 June 2025

1. Petitioning and Supporting Decisional Participants:

Petitioning Decisional Participant: At-Large Advisory Committee (ALAC)

Supporting Decisional Participant(s): To be determined

2. Liaison Information¹

The following representative has been designated by the ALAC, as the Petitioning Decisional Participant, and will act as liaison with respect to the Petition:

Name: Jonathan Zuck, Chair, ALAC

Address: 1401 K Street, NW Suite 502, Washington, DC 20005

Email: JZuck@InnovatorsNetwork.org

Phone Number (optional): +1.202.256.1457

3. Request for Reconsideration of:

☒ Board action/inaction

☐ Staff action/inaction

4. Conference Call; Time/Place for Community Forum

[To be completed after a Supporting DP is identified]

- Are the Petitioning and/or Supporting DPs requesting a publicly accessible conference call prior to the Community Forum for the community to discuss the Supported Petition?

☐ YES

☐ NO

¹ We expect that ICANN will handle liaison information similar to how it handles Requestor information, as stated on the Reconsideration Request template: "ICANN will publish the Requestor's name on the Reconsideration Website at <https://www.icann.org/resources/pages/accountability/reconsideration-en> in accordance with the ICANN [Privacy Policy](#). Requestor's address, email and phone number will be removed from the publication."

- Have the Petitioning and/or Supporting DPs decided to hold the Community Forum during the next scheduled ICANN public meeting.

___ YES

___ NO

5. Description of specific action you are seeking to have reconsidered.

The EC seeks reconsideration of the ICANN Board Resolutions of 19 May 2025 published at <https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-special-meeting-of-the-icann-board-19-05-2025-en#section1.a>, specifically:

1. The continued deferral of the ICANN Fourth Accountability and Transparency Review (otherwise known as ATRT4) pending community dialogue (the third bullet of Resolved 2025.05.19.02) (“**Challenged Decision #1**”);
2. The direction to the ICANN President and CEO or his designee(s) to initiate work to design a review program intended at enhancing ICANN's accountability, transparency, and effectiveness (Resolved 2025.05.19.01) (“**Challenged Decision #2**”); and
3. The direction to ICANN's President and CEO or his designee(s) to develop the plan for community dialogue for ICANN Reviews (Resolved 2025.05.19.04) insofar as it impacts ATRT4 and/or the review of ICANN's accountability and transparency (“**Challenged Decision #3**”).

6. Date of action/inaction:

The date of the Board action in question is 21 May 2025 which is the publication date of the relevant Board Resolutions and rationale of the 19 May 2025 Special Meeting of the ICANN Board.

7. On what date did you become aware of the action or that action would not be taken?

The EC, through the Chairs of its constituent members, became aware of the relevant Board action on 27 May 2025 via the [correspondence from ICANN Board Chair, Tripti Sinha to SO/AC Chairs dated 27 May 2025](https://www.icann.org/resources/pages/correspondence), published at <https://www.icann.org/resources/pages/correspondence>

8. Describe how you believe you are materially and adversely affected by the action or inaction:

The ICANN community, as represented by the Empowered Community, is materially and adversely affected by each of the Board's Challenged Decisions, which defer the next Accountability and Transparency Review for what now appears to be an indefinite period of time and moves to the CEO tasks that are meant to be carried out by the ATRT, on behalf of the community from which it comes.

In adopting Challenged Decision #1, the ICANN Board, whether on the advice of ICANN

Staff or otherwise, is not only denying the EC, its Decisional Participants, their members, and the ICANN community their right, as well as a critical opportunity, to review, assess and improve ICANN's mechanisms for public input, accountability, and transparency, but is also placing ICANN in serious and unwarranted jeopardy by allowing the perpetuation of ICANN's blatant contravention of its Bylaw Section 4.6 (b)(vi). By delaying ATRT4 beyond the mandated period, the Board is also undermining ICANN's Core Values and reducing trust in ICANN's multistakeholder processes.

In adopting Challenged Decisions #2 and #3, the ICANN Board, whether on the advice of ICANN Staff or otherwise, is in effect disempowering the Accountability and Transparency Reviews, making the Accountability and Transparency Review Team's oversight role at ICANN null and void and therefore, disenfranchising the EC and the ICANN community's right to review, assess and improve ICANN's mechanisms for public input, accountability, and transparency. This result not only disenfranchises the Stakeholder Organizations and Advisory Committees ("**SO/ACs**") and the ICANN community's right to review, assess and improve ICANN's mechanisms for public input, accountability, and transparency, it also has ICANN org usurping the role of the ICANN community with respect to review design. By calling for an ICANN org-designed review program, instead of convening ATRT4, the Board is also undermining ICANN's Core Values and reducing trust in ICANN's multistakeholder processes. The Board's commitment to community-led accountability processes within ICANN should be demonstrated through directing the ICANN President and CEO (or his designee(s)) to convene ATRT4 and not to "initiate work to design a review program that is fit for purpose."

The EC and by extension, the ICANN community, believes that this continuing contravention of the Bylaws and disregard for ICANN's Core Values poses a serious threat to ICANN's mandate in coordinating the global Internet's systems of unique identifiers, ensuring the stable and secure operation of the DNS (Domain Name System), IP addresses, and protocol port and parameter numbers. It also significantly undermines trust in and protection of ICANN's multistakeholder model of governance. This brings about a real risk of negative actions against ICANN, which could result in the loss of its mandate or could substantially risk ICANN's multistakeholder model's credibility and effectiveness, which in turn constitutes severe harm to the Empowered Community, the Decisional Participants and their members' Bylaw-accorded roles and participation to act in the interests of the ICANN community and the global public interest.

9. Describe how others may be adversely affected by the action or inaction, if you believe that this is a concern.

The EC is empowered to represent the ICANN community, which is adversely affected by the Challenged Decisions #1, #2 and #3. The ICANN Board and ICANN Staff owe a duty to other ICANN community members to ensure that ICANN operates in the public interest and is transparent and accountable to the Internet community.

10. Detail of Board or Staff Action/Inaction

The Affirmation of Commitments (AoC) between ICANN and the United States

Department of Commerce, signed on 30 September 2009, requires ICANN to commit to undertaking several reviews, including the Accountability and Transparency Reviews. The Accountability and Transparency review process is a fundamental accountability mechanism designed to ensure that ICANN remains responsive to its community and operates in the public interest.

This commitment is enshrined in the ICANN Bylaws, Article 4, Section 4.6(b), which reads, "The Board shall cause a periodic review of ICANN's execution of its commitment to maintain and improve robust mechanisms for public input, accountability, and transparency so as to ensure that the outcomes of its decision-making reflect the public interest and are accountable to the Internet community ("Accountability and Transparency Review")," which the ICANN Board itself pointed out in the preamble of its Resolutions of 19 May 2025.

Challenged Decision #1

ICANN Bylaws Section 4.6 (b)(vi) states that, "The Accountability and Transparency Review shall be conducted no less frequently than every five years measured from the date the previous Accountability and Transparency Review Team was convened."

Since the last Accountability and Transparency Review Team (ATRT3) was appointed on 20 December 2018 (<https://www.icann.org/en/announcements/details/members-announced-for-the-third-review-of-icanns-accountability-and-transparency-atrt3-20-12-2018-en>), the next Accountability and Transparency Review Team (ATRT4) should therefore have been appointed by 20 December 2023.

The Board has postponed ATRT4 once already. On 29 April 2024, the Board decided to defer ATRT4 "for a limited time not to exceed twelve months." This delay was already in contravention of the Bylaws. This new 19 May 2025 decision of the ICANN Board further delays the start of the next Accountability and Transparency Review (ATRT4), which is already 18 months overdue.

These "periodic reviews" are intended to be cyclical (i.e., periodic). In setting periodic reviews, the Board and the ICANN community recognized the specific value in having reviews repeat on a set timeline. By the time ATRT4 is finally convened, it could be at or around (or even after) the time when ATRT5 should have been convened; so, we will have lost an entire review cycle.

The Board failed to consider whether the Challenged Decisions, in particular the postponement of ATRT4, violated the Bylaws and what the ramifications of such a violation could be. More specifically, the Board failed to take into account the contrast between how the review timing was set out in Section 4.6 (ATRT4) and that in Section 4.4 ("Periodic Review of ICANN Structure and Operations"). Section 4.4 states that "These periodic reviews shall be conducted no less frequently than every five years, **based on feasibility as determined by the Board.**" By contrast, Section 4.6(b) does not contain this "feasibility exception"; it merely lays out the timing of five year cycle, with no room for revisions. While this is also true of the "Specific Reviews" set out in Section 4.6, the Accountability and Transparency Review carries premier significance given its fundamental role as the accountability mechanism for ensuring that ICANN

remains responsive to its community and operates in the public interest.

The inescapable conclusion is that ICANN has an ability to postpone the Structural Reviews pursuant to Section 4.4, but has no such ability when it comes to Accountability and Transparency Reviews under Section 4.6(b). In other words, the ICANN Board granted to itself a power it did not have. The Board then soft-pedalled this Bylaws violation as a “continued variance from the Bylaws’ mandated timing of ATRT4.” (Rationale for Resolutions, section on ATRT4) The rationale goes on to state that the Board does not take this “variance” lightly. That is nice to know; however, the Board should never have taken the variance at all.

Challenged Decisions #2 and 3

Challenged Decision #2 directs the ICANN President and CEO or his designee(s) to initiate work to design a review program intended at enhancing ICANN's accountability, transparency, and effectiveness. Meanwhile, Challenged Decision #3 directs the ICANN President and CEO or his designee(s) to develop the plan for community dialogue for ICANN Reviews insofar as it impacts ATRT4 and/or the review of ICANN's accountability and transparency.

By directing this work to the CEO, the Board sidestepped Section 4.6(a)(v), which grants to each Accountability and Transparency review team the power to “recommend that the applicable type of review should no longer be conducted or should be amended.” In addition, the ATRT is the only one of the periodic review processes given the power to “recommend to the Board the termination or amendment of other periodic reviews required by this Section 4.6, and [to] recommend to the Board the creation of additional periodic reviews.”

Clearly, ATRT is meant to be the designer of reviews, both its own and the other periodic reviews, which would also include recommending a plan for community dialogue. If the Board had allowed ATRT4 to convene, it could have begun this work over a year ago. This would have been practical, elegant and most importantly, consistent with the Bylaws. However, the Board apparently never took this core role of ATRT4 into account. Instead of empowering the community, it empowered the CEO. The CEO is, by definition, neither multistakeholder nor bottom-up. By directing this work to the CEO, the Board weakened the multistakeholder process and contravened the Bylaws.

The fact that ICANN is still in the process of implementing recommendations from the Third Accountability and Transparency Review (ATRT3), including some related to the assessment of Specific and Organizational Reviews, is no justification for further delaying the next Accountability and Transparency Review (ATRT4). We again reiterate and quote the ICANN Bylaws Article 4, Section 4.6 (b)(vi), “The Accountability and Transparency Review shall be conducted no less frequently than every five years measured from the date the previous Accountability and Transparency Review Team was convened.” It does not say that ICANN can indefinitely delay ATRT4 due to ongoing implementation of ATRT3 recommendations. There is also no requirement for ATRT3 recommendations to have been fully implemented before ATRT4 can proceed. If that were the case, ICANN would be perpetually in violation of its own Bylaws by not expeditiously implementing all approved ATRT recommendations in order to make way

for the next one. Indeed, Section 4.6(b)(iii) states that the ATRT “shall also assess the extent to which prior Accountability and Transparency Review recommendations have been implemented and the extent to which implementation of such recommendations has resulted in the intended effect,” which explicitly recognizes that the implementation of the prior ATRT (or even ATRTs) may still be a work in progress during the work of the current ATRT. By contrast, nothing in the Bylaws appears to support the idea that the reviews are intended to be non-overlapping.

ICANN’s Mission and Core Values emphasize accountability, transparency, and the need for periodic, community-driven reviews. Since the IANA transition, ICANN holds a special status as a free standing multistakeholder organization, albeit cloaked in legal form as a non-profit California public benefit corporation. The Accountability and Transparency Review is the multistakeholder oversight mechanism that most directly supports and protects ICANN’s ability to remain free of national, treaty, or United Nations control.

The EC, through its Decisional Participants and their constituent and individual members, and the larger ICANN community have, over the years, participated extensively in ICANN meetings, working groups and other processes in support of ICANN’s multistakeholder model, wherein key decisions and directions of ICANN are determined by a bottom-up process rather than a top-down one. Evidencing this, ICANN has conducted three community-driven Accountability and Transparency Reviews thus far. By delaying ATRT4 beyond the mandated period, the Board is undermining ICANN’s Core Values and reducing trust in ICANN’s multistakeholder processes.

This continuing contravention of the Bylaws and disregard for ICANN’s Core Values constitute a serious threat to ICANN’s mandate in coordinating the global Internet’s systems of unique identifiers, ensuring the stable and secure operation of the DNS (Domain Name System), IP addresses, and protocol port and parameter numbers. It also significantly undermines trust in and protection of ICANN’s multistakeholder model of governance. There is a real risk of sanctions against ICANN, which could result in the loss of its mandate and/or multistakeholder model of governance. This in turn constitutes severe harm to the EC and the SO/ACs’ Bylaw-accorded role and participation to act in the interests of Internet individual end users in ICANN.

Further, speedily moving to convene ATRT4 by no means suggests that the ICANN Board will be required to adopt all ATRT4 recommendations. The Board will be expected to apply its normal due diligence process when considering ATRT4 recommendations.

11. What are you asking ICANN to do now?

The EC requests that the ICANN Board take the following actions:

- With respect to **Challenged Decision #1**: Modify its Resolution 2025.05.19.02 by rescinding the third bullet with respect to ATRT4 and take action to immediately initiate ICANN’s Fourth Accountability and Transparency Review in accordance with ICANN Bylaws Article 4, Section 4.6 (b).
- With respect to **Challenged Decision #2**: Rescind Resolution 2025.05.19.01

altogether.

- With respect to **Challenged Decision #3**: Either rescind Resolution 2025.05.19.04, or in the alternative, modify Resolution 2025.05.19.04 such that the direction of ICANN's President and CEO, or his designee(s), to develop the plan for community dialogue for ICANN Reviews in no way impedes or impacts the convening and/or conduct of ATRT4.

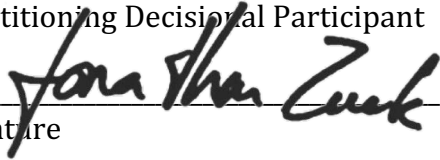
12. Please state specifically the grounds under which you have the standing and the right to assert this Reconsideration Request, and the grounds or justifications that support your request.

This Empowered Community Reconsideration Petition is filed pursuant to ICANN Bylaws Article 4, Section 4.2(b), which states that “The EC may file a Reconsideration Request (as defined in Section 4.2(c)) if approved pursuant to Section 4.3 of Annex D (“**Community Reconsideration Request**”) and if the matter relates to the exercise of the powers and rights of the EC of these Bylaws,” and Section 4.3 (Community Reconsideration Request) of Annex D to the ICANN Bylaws.

See Sections 8 and 10 of this Petition regarding the material harm and adverse impact of the Challenged Decisions.

On behalf of the At-Large Advisory Committee,
as Petitioning Decisional Participant

Signature



18 Jun 2025
Date

Jonathan Zuck
Print Name

Chair, At-Large Advisory Committee
Title

Appendix 1

Terms and Conditions for Submission of Reconsideration Requests

Reconsideration Requests from different Requestors may be considered in the same proceeding so long as: (i) the requests involve the same general action or inaction; and (ii) the Requestors are similarly affected by such action or inaction. In addition, consolidated filings may be appropriate if the alleged causal connection and the resulting harm is substantially the same for all of the Requestors. Every Requestor must be able to demonstrate that it has been materially harmed and adversely impacted by the action or inaction giving rise to the request.

The BAMC shall review each Reconsideration Request upon its receipt to determine if it is sufficiently stated. The BAMC may summarily dismiss a Reconsideration Request if: (i) the Requestor fails to meet the requirements for bringing a Reconsideration Request; or (ii) it is frivolous. The BAMC's summary dismissal of a Reconsideration Request shall be documented and promptly posted on the Reconsideration Website a.

Hearings are not required in the Reconsideration Process; however, Requestors may ask for the opportunity to be heard. The BAMC retains the absolute discretion to determine whether a hearing is appropriate, and to call people before it for a hearing. The BAMC's decision on any such request is final.

For all Reconsideration Requests that are not summarily dismissed, except where the Ombudsman is required to recuse himself or herself and Community Reconsideration Requests, the Reconsideration Request shall be sent to the Ombudsman, who shall promptly proceed to review and consider the Reconsideration Request. The BAMC shall make a final recommendation to the Board with respect to a Reconsideration Request following its receipt of the Ombudsman's evaluation (or following receipt of the Reconsideration Request involving those matters for which the Ombudsman recuses himself or herself or the receipt of the Community Reconsideration Request, if applicable).

The final recommendation of the BAMC shall be documented and promptly (i.e., as soon as practicable) posted on the Reconsideration Website at <https://www.icann.org/resources/pages/accountability/reconsideration-en> and shall address each of the arguments raised in the Reconsideration Request. The Requestor may file a 10-page (double-spaced, 12-point font) document, not including exhibits, in rebuttal to the BAMC's recommendation within 15 days of receipt of the recommendation, which shall also be promptly (i.e., as soon as practicable) posted to the ICANN Reconsideration Website and provided to the Board for its evaluation; provided, that such rebuttal shall: (i) be limited to rebutting or contradicting the issues raised in the BAMC's final recommendation; and (ii) not offer new evidence to support an argument made in the Requestor's original Reconsideration Request that the Requestor could have provided when the Requestor initially submitted the Reconsideration Request.

Appendix 2

Summary of Empowered Community Reconsideration Petition Process

Introduction

Since this is the first Empowered Community Reconsideration Petition, the ALAC felt that it would be helpful to summarize the Empowered Community reconsideration request process.

ICANN has a Reconsideration Process through which individuals or entities can ask the Board to reconsider certain acts of the ICANN Board and organization. The Reconsideration Process is set out in Section 4.2 of the ICANN Bylaws.

ICANN Bylaws Section 4.2(b) states that the Empowered Community (“**EC**”) may file a Reconsideration Request (as defined in Section 4.2(c)) (the “**Community Reconsideration Request**”) if approved pursuant to Section 4.3 of Annex D to the ICANN Bylaws.

In ICANN Bylaws Annex D, Section 4.3 sets out a process (the “**Community Reconsideration Initiation Process**”) by which any Decisional Participant (“**DP**”)² may seek support for a Community Reconsideration Request from the other EC DPs, and if supported and approved, for the EC to file a Community Reconsideration Request.

Phase 1: Community Reconsideration Request Initiation Period

Any DP may request that the EC initiate a Community Reconsideration Request by delivering a notice requesting a review or reconsideration of an action or inaction of the ICANN Board or staff (a “**Community Reconsideration Petition**”) to the EC Administration (“**ECA**”) and the other DPs, copying the ICANN Secretary (currently John Jeffrey) for ICANN to promptly post on its website.

A Community Reconsideration Petition must be delivered within 30 days after certain stated events, depending on the nature of the action or inaction:

(A) for requests challenging Board actions, within 30 days after the date on which information about the challenged Board action is first published in a resolution, unless the posting of the resolution is not accompanied by a rationale, in which case the request must be submitted within 30 days from the initial posting of the rationale;

(B) for requests challenging Staff actions, within 30 days after the date on which the Requestor became aware of, or reasonably should have become aware of, the challenged Staff action; or

(C) for requests challenging either Board or Staff inaction, within 30 days after the date on which the Requestor reasonably concluded, or reasonably should have concluded, that action would not be taken in a timely manner.³

The delivery date of the Petition is the “**Community Reconsideration Notification Date.**” The “**Community Reconsideration Petition Support Period**” starts on the day after the Notification and expires on the 21st day after the Notification Date at 11:59 pm, local time at ICANN’s principal office.

² The EC Decisional Participants are the GAC, ALAC, GNSO, ccNSO and ASO.

³ See Section 4.2(g)(i)(A), (B) and (C) of the Bylaws.

Phase 2: Community Reconsideration Request Petition Support Period

During the Petition Support Period, the Petitioning DP communicates with the other DPs, either directly or through the ECA, to determine if there is support from at least one other DP. The following written communication is required by Annex D:

- After delivering the Petition, the Petitioning DP must contact the ECA and the other DPs to determine if any other DPs support the Petition, again copying the Secretary for posting to the ICANN website.

DPs should review Petitions according to their own internal processes. With a decision to support a petition, the now “Supporting Decisional Participant” notifies the Empowered Community, the ICANN Secretary, and all other Decisional Participants.

If the Petitioning DP obtains support from at least one other DP during the Petition Support Period, the Petition becomes a “**Community Reconsideration Supported Petition**” ([see](#) pages 3-4 regarding Supported Petition requirements) and the following notices are required:

- The Petitioning DP must provide written notice of such support to the ECA, the other DPs and the Secretary within 24 hours after receiving such support.
- Each Supporting DP must also provide written notice of such support to the ECA, the other DPs and the Secretary within 24 hours after providing such support.

After the Petition Support Period expires:

- If the Petition failed to receive support, the ECA will send a “**Community Reconsideration Termination Notice**” to the ICANN Secretary for posting on the ICANN website, ending the process. Presumably, the notice will be copied to all of the DPs.
- If there is a Supported Petition, the “**Community Reconsideration Forum Period**” will start.

Phase 3: Community Reconsideration Forum Period

(i) If the Supported Petition requests a [conference call](#) prior to the Community Forum, ICANN will, at the direction of the ECA, schedule the call, notify the DPs of the date, time and participation methods for the conference call, and promptly post the notice on the ICANN website.

(ii) The Community Forum will take place either:

- During the 30-day period beginning with the expiration of the Petition Support Period and ending on the 30th day after the expiration of the Support Period at 11:59 p.m. (local time at ICANN's principal office), or
- If the Supported Petition requested that the Forum be held during the next scheduled ICANN public meeting, the Community Forum will take place during the next scheduled ICANN public meeting on a date and time determined by ICANN, taking into account any requests from the Petitioning DP and the Supporting DP(s).

The Community Forum Period is the longer of the two periods above.⁴

(iii) The Community Forum will be conducted via remote participation (e.g., teleconference, web-based meeting room and/or such other form of remote participation as the ECA selects) and, if the Community Forum is held during an ICANN public meeting, via face-to-face meetings.

- The ECA must promptly inform ICANN of the date, time and participation methods of the Community Forum, which ICANN shall promptly post on the Website. Presumably, the ECA will also inform the DPs directly, but that may fall to ICANN, as the rules are unclear.

(iv) The ECA is expected to manage and moderate the Community Forum in a fair and neutral manner.

Phase 4: Community Reconsideration Decision Period

The Decision Period starts immediately after the Community Forum Period ends, and lasts for 21 days, expiring at 11:59 pm (local time at ICANN's principal office).

During the Decision Period, each DP will provide notice to the ECA in writing (copying the ICANN Secretary for posting on the ICANN website), whether that DP:

- (i) supports such Supported Petition,
- (ii) objects to such Supported Petition, or
- (iii) has determined to abstain from the matter (which shall not count as supporting or objecting to the Supported Petition)

If a DP does not inform the ECA prior to the expiration of the Decision Period, the DP shall be deemed to have abstained from the matter (even if such DP informs the ECA of its support or objection following the expiration of the Decision Period).

If three or more DPs support the Supported Petition and no more than one DP objects to the Supported Petition, then the ECA will, within 24 hours of the expiration of the Decision Period, deliver a notice to the ICANN Secretary certifying that the EC has resolved to accept the Supported Petition ("**EC Reconsideration Initiation Notice**"). The Reconsideration Request shall then proceed in accordance with Section 4.2 of the Bylaws.

The Community Reconsideration Supported Petition

The Community Reconsideration Supported Petition must include:

- (A) a supporting rationale in reasonable detail;
- (B) contact information for at least one representative designated by the Petitioning DP, who shall act as a liaison with respect to the Supported Petition;
- (C) a statement whether the Petitioning DP and/or the Supporting DP are requesting that ICANN organize a publicly accessible conference call prior to the "**Community**

⁴ If the Forum is held during the next scheduled ICANN public meeting and that public meeting is held after 11:59 p.m. (local time at ICANN's principal office) on the 30th day after the expiration of the Support Period, the Forum Period will expire at 11:59 p.m., local time of the city hosting the ICANN public meeting on the official last day of such ICANN public meeting.

Reconsideration Community Forum⁵ for the community to discuss the Community Reconsideration Supported Petition; and

(D) a statement whether or not the Petitioning DP and the Supporting DP have decided to hold the Community Reconsideration Community Forum during the next scheduled ICANN public meeting.

The ECA will act as the Requestor (i.e., the person or entity filing the Request) for such a Community Reconsideration Request and will act on behalf of the EC for the Community Reconsideration Request as directed by the DPs, as further described in Section 4.3 of Annex D.

Requestors may submit all facts necessary to demonstrate why the action/inaction should be reconsidered. However, argument must be limited to 25 pages, double-spaced and in 12-point font. Requestors may submit all documentary evidence necessary to demonstrate why the action or inaction should be reconsidered, without limitation.

⁵ Defined in Section 4.3(c) of Annex D to the ICANN Bylaws.