

ICANN Organization’s Report of Public Comment Proceeding

ICANN Organization’s Draft FY21–25 Operating and Financial Plan and Draft FY21 Operating Plan and Budget

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Public Comment Proceeding		<p style="text-align: center;">Important Information Links</p> <p style="text-align: center;">Announcement</p> <p style="text-align: center;">Public Comment Proceeding</p> <p style="text-align: center;">View Comments Submitted</p>	
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Section I: General Overview and Next Steps

ICANN’s Strategic Plan for Fiscal Years 2021–2025 was developed through a community-based process and adopted by ICANN’s Board on 23 June 2019. The Strategic Plan underpins ICANN’s Five-Year Operating Plan, which also includes community input, strategic goals, and corresponding accountability performance indicators, dependencies, five-year phasing, a list of objectives, and a five-year financial model. Accompanying each update to the Five-Year Operating Plan is an Operating Plan and Budget for the coming fiscal year.

On 20 December 2019, the ICANN organization published for public comment the Draft FY21–25 Operating and Financial Plan and the Draft FY21 Operating Plan and Budget documents. Community webinars took place on 8 February, 9 February and 14 February 2020 during the 67-day public comment period.

ICANN org received submissions from nine community groups and three individuals. From those submissions, ICANN org identified 171 specific comments covering 11 different themes. All comments are listed in the Appendix of this report along with a reference to a corresponding ICANN response in this document. Two submissions were received after the submission deadline for public comments had expired.

Following the public comment period, ICANN org held a remote public session during ICANN67 to discuss the community comments with several community groups and individuals. These interactions enabled ICANN org to develop better responses and identify appropriate revisions to the draft plans that were posted.

Since concluding the public comment process, the COVID-19 pandemic is affecting significantly the entire world. ICANN expects that its activities and financial position will be significantly impacted as well. The ICANN org is working with the Board to assess and monitor the potential impact to ICANN’s funding, and planned work such as face-to-face meetings, travel, etc. The org remains committed to transparency, and any changes to the

current Draft FY21-25 Operating and Financial Plan, and FY21 Operating Plan and Budget plans will be shared with the community in the coming weeks, prior to Board approval.

The updated FY21–25 Operating and Financial Plan and FY21 Operating Plan and Budget will be presented to the ICANN Board for adoption at a Board meeting in May 2020.

Each year, ICANN org uses the comments and other feedback about the draft planning documents to identify areas of strength, areas that need improvement, and specific changes to the planning process for the following planning year. This is a part of ICANN org’s process of continuous improvement.

Monetary references are in U.S. dollars unless otherwise stated. All references to suggested changes in the FY21–25 Operating and Financial Plan and the FY21 Operating Plan and Budget are subject to Board approval.

Section II: Contributors

At the time this report was prepared, nine communities and three individuals posted comments to the forum. The following table lists these contributors in alphabetical order. Any quotations taken from contributor comments will reference the contributor’s initials.

Organizations and Groups:

Name	Submitted by	Initials
At-Large Advisory Committee	At-Large Advisory Committee	ALAC
Business Constituency	Steve DelBianco	BC
Country Code Names Supporting Organization — Strategic and Operational Planning Committee	Giovanni Seppia	ccNSO-SOPC
Generic Names Supporting Organization Council	Berry Cobb	GNSO
Governmental Advisory Committee	Robert Hoggarth	GAC
gTLD Registries Stakeholder Group	Samantha Demetriou	RySG
I2Coalition	Christian Dawson	I2Coalition
Non-Commercial Stakeholders Group	Rafik Dammak	NCSG
Registrar Stakeholder Group	Zoe Bonython	RrSG

Individuals:

Name	Affiliation (if provided)	Initials
Betty at ipeos.com		
Cheryl Langdon-Orr		
Martin Atayo		

Section III: Summary of Comments

General Disclaimer: This section summarizes comments in an overview grouped into 11 themes. To read the full text of any comment, please refer to the Important Information Links box at the top of page one of this document and click on “View Comments Submitted.”

Each comment received was read, analyzed, and sorted into 11 common themes, listed below in alphabetical order. The analysis section (Section IV, Analysis of Comments) provides a high-level description of the comments addressed within each theme.

- Budget Development Process and Document Contents/Structure
- Community Engagement and Services
- Evolve ICANN’s Multistakeholder Model Work Plan
- Financial Management
- Funding
- ICANN Org Governance
- ICANN Org Headcount
- ICANN Org Shared Services
- Operating Initiatives
- Policy Development and Implementation Support
- Technical & DNS Security

Section IV: Analysis of Comments

General Disclaimer: This section provides a brief description of the comments submitted within each theme.

Budget Development Process and Document Contents / Structure

A total of 16 comments were submitted on this theme. Several comments pertained to recommendations that would improve ease of readability and clarity for the community.

Community Engagement and Services

A total of 14 comments were submitted on this theme. These comments varied in scope; some indicated a need for more explanation of resources allocated to outreach.

Evolve ICANN’s Multistakeholder Model Work Plan

This document, included as part of the appendix to the draft FY21–25 Operating and Financial Plan, received 33 comments submitted by five groups. The input received will help ICANN org to develop a final work plan. ICANN org will develop a document in response to the public comments received and lay out next steps for getting to a work plan.

Financial Management

A total of 20 comments were submitted by ten groups on various aspects of ICANN’s expenses and financial assumptions.

Funding

Eight comments were submitted on various aspects of ICANN’s funding assumptions.

ICANN Org Governance

Four comments were submitted, generally seeking clarification of expenses included in the draft documents.

ICANN Org Headcount

A total of seven comments were submitted regarding headcount and/or staffing. These comments primarily suggested a need for further explanation of and rationale for headcount and personnel expenses.

ICANN Org Shared Services

Five comments were submitted regarding cost management for various departments.

Operating Initiatives

Forty-three comments were submitted regarding resources and assumptions underlying the initiatives.

Policy Development and Implementation Support

Sixteen comments were submitted with a general theme of funding for policy programs.

Technical and DNS Security

Five comments were submitted regarding IANA functions, DNS Ecosystems, and Root Zone management.

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1 Introduction

ICANN published the Draft FY21–25 Operating and Financial Plan, along with the Draft FY21 Operating Plan and Budget documents on 20 December 2019 for public comment. A total of 171 specific comments were received from nine community groups and three individuals.

Since concluding the public comment process, the COVID-19 pandemic is affecting significantly the entire world. ICANN expects that its activities and financial position will be significantly impacted as well. The ICANN org is working with the Board to assess and monitor the potential impact to ICANN’s funding, and planned work such as face-to-face meetings, travel, etc. The org remains committed to transparency, and any changes to the current Draft FY21-25 Operating and Financial Plan, and FY21 Operating Plan and Budget plans will be shared with the community in the coming weeks, prior to Board approval.

Following the public comment period, ICANN org held a public session at the virtual ICANN67 meeting to gain a better understanding of the comments. This session helped ICANN org develop better responses and changes to the draft plans. In addition, conference calls were held with the ALAC, the GNSO Strategic Committee on Budget and Operations and the ccNSO Strategic and Operational Planning Committee, during which the comments submitted by these organizations were reviewed and discussed bringing more clarity and better understanding of the context and intent of such comments. We thank the leaders and members of these groups for the additional time they have offered to help ICANN address better the comments.

This document provides ICANN org’s responses to the 171 comments submitted through the public comment process. These responses were organized into 11 relevant themes, which constitute the 11 sections that follow this introduction and precede the Appendix. Instead of displaying each comment and each response in side-by-side columns, this document presents all of the comments in the Appendix. Responses, however, are featured in the 11 sections that immediately precede the Appendix and follow this introduction. Follow these steps to find responses to submitted comments:

- Locate the names of community group or individuals in the left-hand column (the Contributor column) of the Appendix.
- View the comments submitted by community groups or individuals in the middle column marked with the heading “Question / Comment.” If a group or individual submitted more than one comment, these are located sequentially in the middle column adjacent to the name of the group or individual.
- View the reference column which displays the section of this document containing the response to the submitted comment.

ICANN welcomes and recognizes the diverse participation from stakeholders as ICANN’s planning process, including the Strategic Plan, Operating Plan, Budget, and ongoing operational and financial updates, continues to evolve.

2 The FY21–25 Operating and Financial Plan and the FY21 Operating Plan and Budget

2.1 Budget Development Process, Document Contents and Structure

2.1.1 Transparency and Accountability

ICANN org continually strives to provide more information in published documents to enhance transparency and accountability. It will continue to implement further controls and align formatting and style for future Operating and Budget Plans.

ICANN org recognizes that the Draft FY21–25 Operating and Financial Plan document is extensive and lengthy. Considering that the community would likely focus on the areas of their interest, ICANN org intentionally repeated information in various sections to help ensure it would be viewed by all community groups.

Tracking and reporting on progress toward achievement of the Strategic Plan is important and ICANN is working on developing mechanisms that can effectively monitor progress and achievement. Community input, such as the work of the third Accountability and Transparency Review Team (ATRT3), and lessons learned over the last few years, will inform this effort.

ICANN org realizes that some sections in the Draft FY21–25 Operating and Financial Plan can appear duplicative. For example, the “Activities” and the “How Progress is Tracked” sections can present similar information. The “How Progress is Tracked” sections of the plan will continue to be refined and more metrics-driven in future documents.

2.1.2 Prioritization and Objective to Goal Alignment

ICANN org recognizes the challenge of referencing the connections between the Strategic Plan and Operating and Financial Plan. The ICANN FY21–25 Strategic Plan was adopted by the Board on 23 June 2019 and is not subject to revisions as part of this public consultation. ICANN invites the community to provide inputs on proposed revisions of the Strategic Plan in future community engagements organized during the annual planning process

Internally, ICANN org has mapped the operating initiatives and functional activities to the targeted outcomes of the goals and objectives in the Strategic Plan and validated that the Strategic Plan is supported by the Draft FY21–25 Operating and Financial Plan. The Targeted Outcomes of the Strategic Goals are supported both by the 15 operating initiatives and the 35

functional activities. The mapping of the links is also important to the tracking and reporting of ICANN org's progress toward the achievement of the Strategic Plan. Since the mapping is large and complex, ICANN org is evaluating ways to present the linkage mapping via infographics and other interactive means and will share with the community once complete.

The operating initiatives are the priorities of the organization and represent the major areas of work that support the achievement of the Strategic Plan. The duration of time as well as the requirements and resources for each Operating Initiative can be varied. For each operating initiative, ICANN org has estimated a low, medium, and high range of possible expenses over the five-year period. At this point, ICANN org has sufficient funds to cover all the operating initiatives included in the draft five-year plan. In the FY21 Operating Plan and Budget, expenses and resources are projected in more detail than they are in FY21–25 for both the 15 operating initiatives and the 35 functional activities.

As time progresses, priorities may shift based on the environment and current priorities. The five-year plan will be rolled forward each year, and ICANN org will assess the priorities each year during the plan update process.

2.2 Financial Management

Estimating costs five years in advance inherently requires many assumptions that are based on the best information at the time and the formulation of scenarios of possible activities and effects. The Draft FY21–25 Operating and Financial Plan displays ICANN org's best estimate for future activities and needs through information gathered from a variety of sources. The cost category expenses remain relatively flat year-over-year due to cost reduction through leveraging economies of scale and continued process improvement. In addition, ICANN org periodically evaluates the adequacy of resources allocated to carry out its activities to ensure resources support optimal efficiency at the lowest cost.

2.2.1 Additional Budget Requests

A team of executives and other personnel manage the Annual Budget Request (ABR) process in accordance with published guidelines aiming to ensure transparency and equity across all Supporting Organizations (SOs) and Advisory Committees (ACs) that submit requests. The process includes a periodic evaluation of successful requests in the pilot phase, to consider funding such activities on a more permanent basis through the core budget. In addition, ICANN org conducts a number of capacity development and outreach programs through its Government Engagement (GE) and regional stakeholder engagement teams. These programs can supplement or target regional or other identified needs of government participants at ICANN. In response to comments received on the ABR process by the Governmental Advisory Committee, ICANN org encourages the GAC to work with the GE team to identify specific opportunities and topics for which training can be developed or provided.

2.2.2 Contingency

Based on its fundamental principle of financial responsibility, ICANN org continues to ensure its expenditures remain within its available funding. Due to the insecurity by nature of forward

planning, in any fiscal year, expenses will occur that were not planned or that were planned for different amounts. To ensure funding is available to cover for such uncertainty, ICANN org budgets for contingency at the company level. The contingency corresponds to a budgeted amount of expenses, but unallocated to any specific activity function or cost nature in order to enable appropriate flexibility throughout the fiscal year. As stated in Draft FY21 Budget, ICANN org budgets for contingency as part of its planning process. The contingency in the Draft FY21 Budget is \$5.2M, or approximately four percent of total expenses. This contingency amount remains unchanged compared to the previous year and will cover unforeseen and unpredictable FY21 expenses.

2.2.3 Expense Details

ICANN org agrees with comments that underlying assumptions and inputs into financial expenditures should be continually assessed. ICANN org evaluates expenses to ensure they are essential and to determine if efficiencies can be found in expenditures across departments. There are many projects across ICANN org that span multiple years, and therefore have consistent costs year over year. In addition, ICANN org is dedicated to keeping the overall expenses balanced with the trend it sees for funding stabilization.

The expenses in the Draft FY21 Operating Plan and Budget are presented at a high level in order to communicate the overall financial outlook. Within the Draft FY21–25 Operating and Financial plan, the expenses are broken down in more detail with regards to the 15 Operating Initiatives and 35 Functional Activities. ICANN org will take under advisement to present more detail in the current year's Operating Plan and Budget as well as presenting comparisons of costs to those in prior years.

In regard to the GNSO inquiry regarding its yearly strategic plan meeting, part of the FY21 cost is currently budgeted under the Policy Development and Implementation Support function. In addition, a portion of the meeting costs have traditionally been covered by the Additional Budget Requests (ABR) process.

ICANN org is working to develop reporting that will better present the levels of financial support it provides directly to the various Supporting Organizations (SOs), Advisory Committees (ACs), and associated Stakeholder Groups and Constituencies. ICANN org will take under advisement how to better capture the efforts of the volunteer efforts surrounding the policy development processes (PDPs) and implementation and review teams (IRTs).

ICANN org welcomes the GNSO Council's suggestions for improving our resource reporting and enhancing the collaboration between ICANN Org's functions (including Finance) and the GNSO community, in order to facilitate improvements in planning, prioritization and resource allocation across multiple projects and activities. We will continue to work with the GNSO and the community to ensure that any additional or new data points and measurements are reflective of the community's needs and priorities.

2.2.4 General Data Protection Regulation

ICANN org expects to continue working on matters related to the European Union's General Data Protection Regulation (GDPR) through FY21. That said, GDPR-related expenses, especially legal matters, are difficult to predict. Instead of inaccurately budgeting for

unpredictable expenses, ICANN org will use contingency funds for GDPR-related expenses in FY21. The only exception is GDPR-related travel and temporary resources, which have been budgeted at the department level.

2.2.5 Operating Initiative Forecasting

The resources indicated for the operating initiatives display low, mid-point, and high estimates. The estimates provide information on possible scenarios rather than definitive expectations. As planning work advances on each initiative, the nature of activities and resources required to support them will become clearer.

The difference between the high and low estimates compared to the midpoint is not the same for all initiatives. The difference in estimates is due to the varying assumptions and the underlying support that constitute each initiative. ICANN org will continue to refine these estimates as relevant costs and efforts are determined.

2.2.6 Professional Services

Generally, about 50 to 60 percent of ICANN org's professional services expenses are related to consulting and temporary staffing services. The largest vendors in this category are engineering and information technology resources that are outsourced due to the changing technical needs of the organization and the lower cost of off-shore resources. About 15 percent is legal services for such items as contracted party agreements, accreditation matters, and litigation and dispute resolution. About 10 percent covers ICANN's language service needs, such as translation and transcription services related to ICANN Public meetings. The remaining 5 to 15 percent of professional services is fragmented across various categories.

2.2.7 Reserve Fund

ICANN org's investment policy states that ICANN should maintain a Reserve Fund of a minimum of one year of operating expenses. While the Reserve Fund is currently below its target level, the five-year financial plan sets out a replenishment strategy to ensure the Reserve Fund will be replenished in alignment with the Board-Approved timeline.

Additionally, each year the ICANN org will assess the net excess amount available for the Reserve Fund and whether the replenishment can be moved forward. Please view the [replenishment strategy document](#) for more information.

The Reserve Fund helps ensure ICANN's long-term financial health and ability to fulfill its mission and is intended to only be used as a method of last resort. Before tapping into reserves, ICANN org would use alternative measures, such as using its contingency fund or reduce costs to meet demands of unforeseen expenses or lower-than-planned funding. ICANN org notes the suggestion to increase its contingency provision and is expected to have adequate funds for all activities and initiatives mentioned in the Five-Year Operating Plan.

2.3 Functional Activities

2.3.1 Community Engagement and Services

The Community Engagement and Services area functions work collaboratively across a variety of activities and operating initiatives. These teams are in regular communication and share resources to minimize duplication and make the best use of the knowledge and talent within ICANN org.

Ecosystem interaction is part of the Global Stakeholder Engagement function and is incorporated into the planned activities and budget of the Community Engagement and Services Functional Activity.

2.3.1.1 Carbon Footprint

ICANN org has begun to evaluate its existing carbon footprint by working with its travel provider to assess the air, hotel and car rental impacts from ICANN org, the ICANN Board, and funded travelers from the community. As more information is gathered about greenhouse gas emissions from ICANN-related travel, ICANN org will look for ways to identify savings and efficiency in a fiscally, socially, and environmentally conscious way. Read more about this effort in this blog titled [ICANN's Carbon Footprint](#) by ICANN CEO Göran Marby.

2.3.1.2 Consumer Safeguards

The Consumer Safeguards team will collaborate with the Office of the Chief Technology Officer (OCTO) in engaging with the Country Code Names Supporting Organization (ccNSO) and broader country code top-level domain (ccTLD) community regarding DNS security threats and combating DNS abuse. ICANN org encourages ccTLD participation in the Domain Abuse Activity Reporting project in order to better understand security threats within the ccTLD space.

2.3.1.3 Fellowship Program

ICANN org notes the support of the ccNSO's Strategic and Operational Planning Committee (ccNSO SOPC) for the Fellowship Program and looks forward to continuing to work closely with the community on ways to increase Fellows' engagement and participation in ICANN.

2.3.1.4 Global Communications and Language Services

For more details on ICANN org's internal communications function, please visit the "Global Communications and Language Services" section of the Five-Year Operating Plan under Community Engagement and Services. ICANN org notes the suggestion of coordinating with regional organizations to improve the use of translated materials.

2.3.1.5 Global Stakeholder Engagement

Over the five-year period, the Global Stakeholder Engagement (GSE) function intends to add one full-time employee to each of the Brussels, Montevideo, Singapore, and Istanbul offices in support of the operating initiatives, as well as cross-organizational and stakeholder activities. The roles will vary depending on the needs of the regional office, such as administrative support

and project coordination in Montevideo, and technical engagement for Europe, served from the Brussels office.

ccTLDs are a key stakeholder supported by Global Stakeholder Engagement in the regions. GSE is responsible for relationship management with ccTLDs and Internationalized Domain Name ccTLDs at a regional level. The team already works collaboratively with registries, registrars, and regional TLD organizations through activities such as regional DNS forums, capacity development events, and ICANN readouts. These endeavors will continue and grow in FY21–25. Close collaboration with registry operators can increase local presence while adding to the number of capacity development and training events available to regional stakeholders. Close collaboration with registry operators can maximize Domain Name System Security Extensions (DNSSEC) regional training and local adoption by top-level domain registries, Internet service providers, and others.

The GSE team has partnered with the Regional At-Large Organizations (RALOs) on engagement activities and regional efforts to raise awareness of ICANN and its technical and policy work. GSE regularly briefs the At-Large meetings on engagement activities; likewise, GSE works with At-Large Structures in the regions on DNS events, capacity development opportunities, and skill building.

2.3.1.6 Government and Intergovernmental Organization Engagement

Noting the suggestion from the Business Constituency to connect ICANN’s work to the United Nations Sustainable Development Goals (SDGs), ICANN org will examine the alignment and add links to the relevant SDGs as appropriate.

2.3.1.7 Supporting Organizations and Advisory Committees

ICANN org strives to continuously improve how it presents financial support given to Supporting Organizations (SOs), Advisory Committees (ACs), Stakeholder Groups and Constituencies. ICANN org will consider ways to better capture the volunteer efforts surrounding the Policy Development Processes (PDPs) and Implementation Review Teams (IRTs).

ICANN org consolidates some meeting costs for SOs and ACs in the FY21 Operating Plan and Budget. Other specific meetings are reported individually based on cost significance and community requests for information.

2.3.1.8 Regional Offices

Regional offices enable ICANN org to be closer to its diverse stakeholders, as discussed in the Five-Year Operating Plan and Budget. Offices in Brussels, Belgium; Istanbul, Turkey; Montevideo, Uruguay; Nairobi, Kenya; Singapore, Washington D.C. and Los Angeles have regularly hosted community meetings, stakeholder discussions, review teams and other sessions to facilitate community work. Learn more about ICANN org’s international office

strategy by reading these blogs by ICANN CEO Göran Marby: [Our International Office Strategy](#) and [Why I Love the International Office Strategy](#).

The regional offices provide more than global stakeholder engagement. The offices facilitate ICANN org functions housed in the region, which can include Policy Support, Contractual Compliance, gTLD Registry and Registrar Account Services, Meetings, Public Responsibility Support, and in some regions, Finance and Legal services. In all regions, ICANN org works closely with registry operators, regional TLD organizations and Regional Internet Registries. A good example of how this works is at the Casa de Internet in Montevideo, which is home to ICANN and other regional Internet entities.

2.3.2 ICANN Org Governance

2.3.2.1 Accountability Reviews

The ICANN community, Board of Directors, and ICANN org are unified in recognizing that recommendations from its Accountability Reviews must be prioritized and evaluated for effectiveness. Currently, there are about 200 Board-approved recommendations from past reviews that have not yet been implemented. The ICANN Board has expressed its desire to categorize and resource these recommendations that have been developed by the community and adopted by the Board.

At the same time, ICANN org is considering how to effectively streamline the future reviews process. The discussion on reimagining reviews is an opportunity to recalibrate and improve the process through thoughtful interactions between the community, the third Accountability and Transparency Review Team (ATRT3), the ICANN Board and ICANN org. ATRT3, as part of its ongoing review, is also looking into issuing recommendations to streamline reviews and prioritize the implementation of existing recommendations. Given the shared sense of urgency to address the community-issued recommendations, the Board welcomes a dialogue with the ATRT3 in the very near future to explore its ideas on potential immediate remedies to accomplish the task of prioritizing these recommendations.

In connection with the Cross-Community Working Group on Enhancing ICANN Accountability Work Stream 2 (CCWG-Accountability WS2), specific reviews and organizational reviews (referred to as “Accountability Reviews” in the Draft FY21–25 Operating and Financial Plan and Draft FY21 Operating Plan), there are over 300 final recommendations that have come to the Board within the last several years. That number excludes recommendations from ATRT3 and the second Security, Stability and Resiliency Review (SSR2). Implementation of these recommendations will pose challenges to the community and ICANN resources and will require prioritization within the broader context of ICANN work.

Status of work underway:

- In June 2019, the Board began a conversation with the leadership of all specific review teams to share its thoughts on the need to enhance the effectiveness of review recommendations and their implementation. This conversation led to a draft proposal, which the Board has shared with the leadership and the broader community.

- The Board held a public session on streamlining during ICANN66 and has maintained close communication with the ATRT3, which is preparing a proposal to streamline reviews, and prioritize and resource recommendations.
- Neither the Bylaws nor the Operating Standards provide a clear and consistent methodology for formulating effective review team or cross-community recommendations, nor do they provide a basis for evaluating associated resource requirements, prioritizing recommendations across the universe of review teams and cross-community working groups, or budgeting for prioritized recommendations.
- The ATRT3 published its Draft Report for public comment in December 2019 and received 16 comments. The review team is working on finalizing its report and recommendations, and intends to propose ways to prioritize recommendations. This effort is also expected to address the evaluation of effectiveness of recommendations and their implementation.
- Prioritization of recommendations also needs to align with the timeline for the ICANN annual operating plan and budget. The Board and ICANN org are working toward supporting the eventual prioritization process.

2.3.2.2 Board Activities

The Draft FY21–25 Operating and Financial Plan defines the role of the Board in corporate governance, accountability and integrity mechanisms, and code of conduct under the section "Activities" as it relates to Board committees. The Board Committee charters highlight their respective duties and activities. Additional information can also be found under other functional areas such as "Governance Support," "Complaints Office," or "Accountability Reviews;" depending on their respective role in these aspects.

2.3.2.3 Complaints Office

The Complaints Office is working as ICANN org expected. To date, there have been over 50 complaints of which 60 percent have resulted in improvements being made within ICANN org. Additionally, 31 percent of complaints have resulted in an opportunity to educate complainants about ICANN's remit. The Complaints Office is fully staffed with a Complaints Officer who is supported by various functions within the ICANN org such as Communications and Legal services.

2.3.2.4 Strategic Planning and Strategic Initiatives

The annual Strategic Outlook Program trends process helps ICANN org identify new or shifting trends that may impact its Five-Year or One-Year Operating Plan and Budget, or its Strategic Plan. ICANN org seeks to streamline and improve its operations through continuous improvement. It is a standard practice to perform an assessment at the end of a project, and as such ICANN org does not see the need to call out this particular activity for Strategic Initiatives.

2.3.3 ICANN Org Headcount

2.3.3.1 Diversity

ICANN org highly values diversity as the best way to represent the global community it serves, and members of the ICANN org collectively speak more than 50 languages. ICANN is an equal opportunity employer. Employment selection and related decisions are made without regard to sex, race, age, disability, religion, national origin, color or any other protected class.

2.3.3.2 Headcount Numbers

ICANN org's headcount remains stable and consistent with previous years, anticipating approximately 405 personnel by 30 June 2020. Personnel expenses are \$1.6M, up 2.1 percent when compared to last year. The merit/fringe expenses refer to standard of living increases as well as overall corporation health and benefits costs. The incremental 2.1 percent is allocated across all existing and new hires.

Careful management of resources has kept headcount at ICANN org stable and consistently below budget. Requests to create new positions or fill existing vacant positions must be approved by the ICANN President and CEO, CFO, and the Senior Vice President of Human Resources. This rigorous process allows the organization to strategically evaluate each new hire, controlling headcount growth and ensuring proper allocation of resources. This measure and other strategies will ensure that ICANN org has adequate headcount to accomplish its strategic and operational goals. While this process could lead to a headcount increase if work demands require it, the intention is to keep headcount relatively flat to its current resources level.

When new hires are brought on board, ICANN org devotes significant time and resources to their development.

In regard to attrition, ICANN org budgets as a whole organization for an average yearly amount of turnover. The attrition figure is represented as a whole and not allocated out to the functional activities since it cannot be predicted at a department level.

2.3.4 ICANN Org Shared Services

2.3.4.1 Engineering and Information Technology

To date, the Engineering and Information Technology personnel retention rate is higher than industry norm. ICANN org concurs with the comments made by the CCNSO Strategic and Operating Plan Committee that staff members should be supported with career training and development. ICANN org focuses its attention on career ladders, career progression, and matching training.

2.3.4.2 Finance and Procurement

Currently the Finance and Procurement department has two open positions that are being actively recruited. The goal is to fill these needed resources no later than by the end of FY21 and ideally earlier. Once these positions are filled, the Finance and Procurement department will be fully and adequately staffed for optimal operations.

2.3.4.3 Global Human Resources and Administrative Services

ICANN org has five regional offices: Los Angeles (headquarters), Brussels, Istanbul, Montevideo, and Singapore. Additionally, it has engagement centers in Washington, D.C., Geneva, Beijing, and Nairobi. This distribution best enables ICANN org to serve the global community. ICANN org does, however, have staff in over 30 countries. Those not working out of ICANN regional offices are based in home offices.

2.3.4.4 Operations Planning

ICANN org agrees that the good practice is to have the Internal Audit and Control Function report to the Board Audit & Governance committees. More details of this new function will be developed as ICANN org rolls forward the five-year plan.

2.3.4.5 Security Operations

The scope of the Security Operations function is the health and safety of the organization, Board and community when conducting ICANN work. System and information security is not part of the scope of this function. Please refer to the Engineering and Information Technology sections of the plan.

2.3.5 Policy Development and Implementation Support

The Policy Development and Implementation Support functional activity budget mainly reflects direct support for personnel and related activity expenses for the three Supporting Organizations (SOs), four Advisory Committees (ACs), and the Empowered Community. Other indirect support is reflected in other parts of the budget related to services provided to the community for policy work (and advice) from functions such as Legal, Communications, Contractual Compliance, Global Domains Division (GDD), Information Technology, Global Stakeholder Engagement (GSE), regional offices, Language Services, Finance and Constituency Travel. Because ICANN org anticipates minimal funding growth, it is engaging in long-term financial planning in consultation with the Board and community to ensure that the community receives the support it needs to perform its policy work while remaining fiscally responsible. This includes planning for appropriate personnel levels across ICANN org and prioritizing projects as detailed in the draft budget documents. The proposed budget is based on significant consultation across ICANN org and is overseen by the Executive Team, taking into account the changing and expanding needs of and requests from the whole community.

Capacity development remains important and is a key pillar of the regional engagement strategies developed by the GSE team. Capacity development enables participants from

underserved regions and participants with fewer resources to gain knowledge that will enable them to become active participants in ICANN's technical and policy work. ICANN org will consider having an award dedicated to this endeavor.

While policy development is a community-based process predicated on consensus building from the bottom-up, non-policy decisions about ICANN activities or support are handled differently. These types of decisions are made as needs are identified and community input is received. Needs can be identified in different ways and by different people, from community members to members of the public to ICANN org staff. ICANN org typically organizes a process to define the need and creates opportunities for community input at ICANN meetings, during webinars, through public comment processes, and other means.

ICANN posts its draft Operating Plan and Budget for public comment to provide an opportunity for the community and other interested parties to weigh in on these non-policy activities and plans while still in draft form. After careful consideration of all input received, ICANN may amend its plan.

It should be noted that the Operating Plan and Budget is not a policy statement. It is an intended plan of action, with its financial impact (the budget) established at a fixed point in time, based on partial information and assumptions. This plan of action changes as actions are carried out and circumstances change.

2.3.5.1 Constituent and Stakeholder Travel

ICANN org acknowledges that the different figures for Constituent and Stakeholder Travel could be presented in a more clear and supported manner. The total \$2.7M figure in the Draft FY21 Operating Plan and Budget represents all travel dollars allocated to SO and AC activities. In the Draft FY21–25 Operating and Financial Plan, the figure of \$2.4M represents the portion of the \$2.7M total constituent travel that resides in the constituent travel department. \$0.3M of the dollars for constituent travel fall into other functional areas, such as Policy Development and Implementation Support, depending on the nature of the travel.

ICANN org understands and agrees that metrics are needed to measure the success or outcomes of funding for specific activities or programs, and welcomes the community's suggestions as to what these may be.

In response to comments from the GNSO Council, ICANN org wishes to clarify that the number of travel slots has not increased. ICANN org has changed how these costs are shown. Previously, travel costs for those holding SO or AC chair positions were noted separately. For FY21, each group's total travel allocation is shown as a single number.

Transparency is key in documenting how travel funding is allocated to specific events. The figures published in this section are for ICANN events and programs allocated specific funding on a yearly basis, such as ICANN Public Meetings and Regional At-Large Organization assemblies. Other travel funding may be at a community group's discretion subject to general guidelines, such as those of the Community Regional Outreach Program (CROP).

ICANN org is in agreement that attendance alone is not a good measurement for engagement. ICANN is continually looking for ways to improve the community engagement and is open to suggestions.

2.3.5.2 Global Domain Division Strategic Programs

A commenter asked for clarification about language used in this section. To clarify, the phrase "Interest and participation in the New gTLD Program measurably increase, as indicated by inquiries and new entrants in the round" is a Targeted Outcome of the Strategic Goal "Support the continued evolution of the Internet's unique identifier systems with a new round of gTLDs that is responsibly funded, managed, risk-evaluated, and consistent with ICANN processes. Readers can find more information about this on page 22 of the FY21–25 Strategic Plan. This Strategic Goal lies within the Strategic Objective to "evolve the unique identifier systems in coordination and collaboration with relevant parties to continue to serve the needs of the global Internet user base." More information about that Strategic Objective is found on page 18 of the FY21–25 Strategic Plan.

2.3.5.3 Policy Development and Advice

As ICANN org moves toward a more data-driven model of policy development, it is open to reviewing and evaluating all appropriate tools. ICANN org's Policy Research and Data Services team (situated in the Global Domains Division) and the GNSO's increasing reliance on data and metrics in policy making are expected to be key elements of further work in this area. ICANN org invites the ICANN community to continue to provide suggestions for how ICANN org can continue to facilitate more data-driven policy making.

On the question raised by the ccNSO SOPC about neutral advice, ICANN org wishes to clarify that the statement in question was not meant to alter its or the community's role with respect to policy work that is developed via the community's bottom-up consensus process. Rather, ICANN org provides staff support as subject matter experts, managers and facilitators. They are tasked to remain neutral while providing process guidance and strategic planning advice based on experience of a wide range of community work. ICANN org assists the community in its policy development work.

As to the ccNSO SOPC comment about the different views of individual departments on the use of contractual services, the use of professional services is based on factors such as the nature of the department's work, the availability of qualified in-house personnel and the specific needs of a department, project or activity. ICANN org assesses the cost of needed deliverables as well as the benefit of either using a contractor or a full-time personnel. ICANN org is cautious about adding personnel for projects with definitive ends.

Regarding the GNSO Council feedback on the placement of the Names Collision Analysis Project, ICANN org will look at where and how projects like this can be more appropriately categorized in future budgets.

ICANN org's listing of expenses by Functional Activity currently does not allow for the individualization or itemization of specific tools and resources for single activities. ICANN org is working diligently to achieve a balanced budget that stays within its projection of flat funding. ICANN will continually assess areas where cost efficiencies can be gained. Even with the incremental cost of personnel, ICANN org is committed to supporting all the activities within the portion of the budget set for Policy Development and Implementation Support.

2.3.5.4 Policy Research

ICANN org notes several of the targeted outcomes of the Policy Research function pertain to new gTLDs and the New gTLD Program. This is because the New gTLD Program is a specific initiative of ICANN org's Operating Plan and relates to one of ICANN's Strategic Goals: "Plan a properly funded, managed, and risk-evaluated new round of gTLDs." However, the Policy Research function supports more generally the "implementation of consensus policy recommendations as well as relevant review team recommendations and advice developed in the stakeholder community." The New gTLD Subsequent Procedures Policy Development Process is one of the activities supported by the Policy Research function.

Other supported activities include work related to Competition, Consumer Trust, and Consumer Choice (CCT) Review Team Recommendations and Phases 1 and 2 of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process Team (EPDP). The ICANN Board also recently approved the implementation plan for Recommendation 1 of the CCT Review Team Final Report, which urges formalizing and promoting ongoing data collection. Accordingly, ICANN org is currently developing a model for handling data, research, and study project requests from internal and external stakeholders.

ICANN org takes note of the GNSO's recommendation to include milestones and contingencies if milestones are not met and will consider this for future budget and operating and financial plans.

With regard to the resources to conduct the expected work for the Policy Research function, as noted in the Draft FY21–25 Operating and Financial Plan, resources for this function are expected to increase over FY21–25, including potentially procuring specialized expertise and/or professional services. Additionally, as noted in section 3.5.2 of the Draft FY21 Budget ("Potential Implementation Projects and Activities"), the FY21 budget only includes resources for planned or approved activities. The resources supporting the implementation of these recommendations consist mainly of ICANN org personnel contributing as required based on the nature of implementation work. Some additional specific resources may be required on a case-by-case basis. During the annual planning cycle, the implementation activities expected to occur are incorporated into the annual operating plan.

In addition, review team recommendations that were not or have not yet been approved by the Board, are not included in the Draft FY21 Budget. When the Board reviews recommendations, it considers resource requirements as part of its overall review.

As more implementation work is approved, such as implementation of New gTLD Program Subsequent Procedures recommendations, that work, and the resources required will be accounted for in the appropriate budget planning cycle.

2.3.6 Technical and DNS Security

ICANN org, through the Office of the Chief Technology Office and other internal teams, creates reports and whitepapers on technologies and security that fall within the ICANN remit. ICANN org recognizes more can be done and are working on ramping up regular publications. As for safety guidelines, it is important to point out that ICANN's mission is to ensure the Security, Stability, and Resiliency of the Internet unique identifiers for which ICANN has a mandate. In

other areas of Internet security, it is important to note that ICANN org is one of many partners in that forum. ICANN org is committed to doing its part to promote good Internet hygiene and security practices, but there are other very reputable organizations out there with additional skills and experiences that would be complementary to ICANN's work, such as the Anti-Phishing Working Group (APWG), the Messaging Malware Mobile Anti-abuse Working Group (M3AAWG), the Forum of Incident Response and Security Teams (FIRST) and many others that help inform and move the dialogue.

2.3.6.1 IANA Functions

The team supporting the IANA functions is extremely important. While some turnover may be disruptive in the short-term, many proactive measures are in place to mitigate risk in this regard. These include providing professional and career development opportunities into and out of IANA from ICANN, ensuring competitive rewards and benefits, and an organization design that ensures the transferability and development of key skills.

2.3.6.2 Internationalized Domain Names and Universal Acceptance

Work is already underway to set up Universal Acceptance (UA) local initiatives in different regions globally for training and tools aimed at boosting readiness. Multiple ccTLDs support these initiatives, some of which take place within the Commonwealth of Independent States, Eastern Europe and Egypt. ICANN org will aim to reach out to the larger ccTLD community and look forward to their support and involvement.

2.3.6.3 Office of the Chief Technology Officer (CTO)

Much of the work that the Office of the CTO does is focused on either external activities, or supporting other departments on external activities. ICANN will revisit how activities are categorized for more clarity.

The Office of the CTO actively engages with regional bodies in partnership with the Global Stakeholders Engagement team. It has performed training and other capacity development initiatives in collaboration with strategic partners around the globe. Training and Capacity Building is an evolutionary endeavor and ICANN org continuously challenges its own models for improvement. This includes face-to-face training and digital learning.

2.4 Funding

2.4.1 Overview

In the Draft FY21 Operating Plan and Budget, funding for ICANN Operations is estimated to be \$140.4M. This is up 0.2 percent from the FY20 Budget. The projected funding values are intended to be between realistic and conservative, given the available data. ICANN org is committed to continuing reviews and updates of its projections based on the most recent data.

The highest-confidence estimates at the time of budget planning, or “best estimates,” are used in the draft budget.

Many factors are considered in the funding projections. These include input from industry participants (provided directly and in public statements/documents), trends from historical data, recent marketplace developments, and other sources. ICANN org evaluates and uses these sources to develop estimates on future funding. Moreover, under the current budget cycle, funding values for a fiscal year are developed more than 15 months in advance. ICANN org also welcomes the opportunity to further expand direct engagement with contracted parties to gain additional insight on their market projections.

2.4.2 New gTLDs

ICANN org believes it is accurate to say new gTLDs were a key enabler of market growth over the past five years. Taken at face value, the statement does not conflate growth with the relative size of new gTLDs within the wider domain name base, nor does it attempt to correlate such historical growth with the size or diversity of the contracted party base. ICANN org encourages the community to review the dataset 'Number of domains (by TLD category)' which forms part of ICANN's Domain Name Marketplace Indicators. The dataset is available on ICANN's [Open Data Portal](#).

2.4.3 Forecasting

Any forecasting exercise relies on assumptions. Because assumptions are hypothetical and the number of potential scenarios infinite, a well-accepted practice is to select a number of projection variants depicting a range of results viewed as plausible. Creating several forecast scenarios, each with varying thresholds that represent viewpoints of the future, offers a measure of the sensitivity of resulting outcomes. Whenever available and relevant, the assumptions presented are derived from historical trends or based on conservative estimations.

ICANN org's highest-confidence estimate or 'base-case' scenario has historically served as the basis for the organization's annual budget. The growth rate in the 'base case' scenario represents the average legacy gTLD transaction fee growth rate since the launch of the New gTLD Program. ICANN org develops 'high' and 'low' scenario estimates for assumptions that impact funding. These 'high' and 'low' scenarios are helpful in developing contingency plans that address the possibility that such scenarios become reality.

While there is some correlation between domain transaction volumes and ICANN's funding levels, ICANN org agrees that this is not an 'exact' correlation. Indeed, ICANN also derives a subset of its funding from areas such as application fees, accreditation fees, variable fees, sponsorships, etc.

ICANN org will continue to review its projections and update these based on latest data. ICANN org also welcomes the opportunity for direct engagement with contracted parties in order to gain additional insight on their market projections.

In regard to the forecast of the registrar accreditations, further information on this aspect of ICANN org's funding can be found in Section 7.3 / ICANN Operations Funding Details in the Draft FY21 Operating Plan and Budget.

Many factors are considered in the projection of transaction volumes, including input on performance from industry participants provided either directly or via investor statements, recent marketplace developments, as well as opinions on actual or expected changes in supply-side and demand-side conditions. This subset of ICANN's funding, particularly as it relates to new gTLD funding, has historically been more volatile. This makes it challenging to project across a wide time horizon.

It is important to note that under the current budget cycle all funding assumptions for FY21 were developed 24 months in advance for a 12-month period. This means that ICANN's assessment of the marketplace was derived from actuals from the quarter ending in June 2019 and was used to forecast through June 2021.

Any consideration of a fee increase can only result from community-based activities and discussions, that would ultimately result in policy changes or changes to the contracts with registries and registrars. Potential changes to such contracts have not been assumed for the upcoming period.

ICANN org would like to further clarify the distinction between each of the categories mentioned in the FY21 Draft Budget document:

On page 25, ICANN provides a multi-year view comparing historical actuals, current forecast for FY20, and FY21 draft budget values for the New gTLD Program. On this page the \$5.3M cited corresponds to FY20 Forecast Revenue net of Refunds, while the \$5.1M cited corresponds to FY21 draft Budgeted Revenue net of Refunds.

On page 29, ICANN provides a comparison of FY21 draft budget values versus the FY20 adopted budget values. On this page, the \$5.1M cited also corresponds to FY21 draft Budgeted Revenue net of Refunds, consistent to what is presented on page 25. The \$11.7M being cited corresponds to the FY20 adopted Budgeted Revenue net of Refunds.

2.5 Operating Initiatives

2.5.1 Develop Internal and External Ethics Policies

The goal of an ethics policy is to continue strengthening both how ICANN org expects personnel to conduct their work and how the members of the ICANN community should approach their ICANN-related work and interact with one another.

There are likely many aspects of an Ethics Policy that can and should apply to the ICANN Board. An Ethics Policy, however, is not just a standalone singular policy. It is better thought of as a collection of policies and best practices to guide conduct, which is why the first milestone identified in FY21 Operating Plan is to "gather all existing policies that will make up elements of the ethics policies and conduct a gap analysis." One clear example of a policy that will be looked at is the Conflicts of Interest Policy that the Board already follows.

For the ICANN community, the Expected Standards of Behavior are a starting point and would be among the resources that are collected as part of what already guides community behavior. An ethics policy, however, would be broader, such as a code of conduct that helps describe how to effectuate those Expected Standards in meaningful ways, or that requires enhancements to disclosures for those participating in policy development processes. As recently as ICANN66, some parts of the community reflected to the ICANN Board that they were considering ethics policies for their constituencies. This effort will lead to a more unified experience across the multistakeholder community.

The work anticipated in the first year, as anticipated in the FY21 Operating Plan, is expected to result in an internal and external community ethics policy, and then in the future years of the plan efforts will be focused on compliance and tools to measure the effectiveness of those policies.

While ICANN org does not have specific budgetary line items available for this effort, the anticipated resources include (1) engagement of an ethics consultant to collect, review and produce a gap analysis of the relevant policies around ICANN; (2) personnel to support community participation in the discussions; (3) Human Resources to build internal enforcement and compliance programs to meet the new policy or policies, once adopted; and (4) technology resources to build tools to assist the community to meet the new policy or policies, once adopted. The first two of these items will be focused to complete the work anticipated for FY21, with the implementation work completed as appropriate in the latter four years of the Operating Plan.

2.5.2 Evaluate, Align, and Facilitate Improved Engagement in the Internet Ecosystem

A report of the underlying cross-functional inventory of relationships in the Internet ecosystem and the assessments of mechanisms and gaps will be shared with the community, as part of the support for the yearly operating plans, when they are produced. ICANN org will work to incorporate the progress metrics to be shared with the community at the time of the next plan.

ICANN org's engagement with governments and intergovernmental organizations (IGOs) does not have any policy agenda. ICANN org has identified three types of engagement with governments and IGOs. These have been endorsed by the Board, consistent with the ICANN mission and Bylaws. They are direct engagement, when a policy or action directly affects ICANN (e.g., pertains to the DNS); engagement with others; where there is a common and beneficial cause (such as working in the Internet Governance Forum) and selective engagement where a global issue (such as cybersecurity or the European Union's General Data Protection Regulation) may well have a direct effect on ICANN's mission and mandate. This targeted engagement — often at the request of a government or IGO — focuses on providing factual information about the operation of the technical underpinnings of the Internet, so that the interested parties understand the potential impact and unintended consequences of government or IGO actions. These engagements are based in ICANN org's role and technical responsibility to maintain a single, stable, and interoperable Internet and is consistent with ICANN's mission, commitments and core values. In addition, these engagements offer an opportunity to explain ICANN org's role, the multistakeholder model and policy development process and the benefits to the government or IGO to engage in the GAC and participate with the rest of the ICANN community in the policy development process.

ICANN org reports government and IGO engagement activity in the regular reports provided to the GAC, the ICANN Board and posted on the GAC website. In addition, the Government Engagement (GE) function now has a publication page that will host a series of papers covering the engagement work and analysis of government and IGO processes. The legislative and regulatory reports are published on the ICANN [website](#). Once the Information Transparency Initiative launch is complete, the new GE webpage will centralize these various reports and papers and make the material more accessible.

2.5.3 Evolve and Strengthen the ICANN Community's Decision-making Processes to Ensure Efficient and Effective Policymaking

An internal effort is currently underway to develop a sustainable yet cost-effective strategy for testing, deploying and supporting software and communications tools that will facilitate community policy work in the long term. In addition, work is underway to leverage a Customer Relationship Management (CRM) platform that can be used to track policy development and advice work, as well as a consistent and effective project management framework across ICANN org.

ICANN org welcomes the opportunity to engage more deeply with the GNSO and the community, to ensure that any software tools and platforms it decides to invest in are suitable to support the community's current and future needs. Similarly, ICANN org will regularly evaluate its staffing levels and expertise to ensure that the community continues to have the highest level of professional support for its work. ICANN org invites the GNSO Council's continued feedback on specific ways in which we can continuously improve on our service levels and delivery to the community.

ICANN org agrees that strengthening community decision making is another fundamental element in the multistakeholder model. In this regard, ICANN org notes that it runs various training and learning programs (e.g., the ICANN Academy Leadership and Chairing Skills

Program) and provides support to the SO and AC chairs to facilitate their development and information sharing. ICANN org welcomes the community's continued suggestions of specific ways in which ICANN org can continue to provide targeted training and support that will facilitate the community's needs and work, including staffing levels and qualifications. An internal effort is currently underway to develop a consistent project management framework across the organization.

2.5.4 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking

ICANN org welcomes the input of all community members and values the community's work in this very important process. Even though third party resources are utilized in the development of this initiative, ICANN org is committed to having the community involvement as a priority. ICANN org continually strives to provide more information in the published documents to enhance transparency and accountability. ICANN org will consider adding a more comprehensive and clearer layout of the budget dollars to each Operating Initiative assumption.

In addition, ICANN org believes that more informed participants will lead to greater output. ICANN org has many programs and outreach services that aim to increase the skill set and knowledge of community members. The goal is to provide people with the opportunity to participate at a more meaningful level.

Comments received make it clear that improving metrics that will yield clearer information on the work, hours and value of community participation. Efforts by the Board, ICANN org, and the Community to prioritize and plan work should be a matter of strategic priority. ICANN org has begun discussions with the SO and AC chairs as to how the community can be more involved, and at what stage, in ICANN's annual budget and periodic planning processes.

ICANN org remains committed to ensuring that the community has the relevant personnel and resource support it needs to conduct its work, particularly in view of the operating initiatives and related strategic objectives outlined in the draft FY21–25 Operating and Financial Plan and Strategic Plan. Whether and how specific policy making efforts will be supported via face-to-face meetings will largely depend on the priority level and complexity of the project in question and the availability of funding and resources. ICANN org encourages the GNSO and the community to identify any specific additional staffing and resource needs it believes it will need, over the next one to five years, to achieve its policy priorities.

2.5.5 Facilitate DNS Ecosystem Improvements

The initiative “Promote Domain Name System Security Extensions and Increase its Deployment” has since been consolidated under the FY21–25 Operating Initiative “Facilitate DNS Ecosystem Improvements.” This initiative encompasses efforts to understand, document, and improve the emergency readiness of ICANN and other actors in the DNS ecosystem. While one is focused on improvements to the ecosystem as a whole, the other is centered on

improving a system used to provide root zone management services. Furthermore, ICANN org will coordinate with regional organizations and ccTLDs to ensure success at a regional level.

The DNS Security Facilitation Initiative (DSFI) is in a very early stage of framing. This project is intended to be a community effort, but ICANN org has completed some work on scoping and resourcing the project. Once the project formation is complete, ICANN org will host information sessions to introduce the project and ask for assistance in forming the Technical Steering Group (TSG) that would help inform and drive the project. More information will be published in the near future.

At this time, the Office of the CTO has decided to put a hold on the project regarding use of artificial intelligence to understand abuse trends in domain registration until a time that ICANN org can reprioritize resources.

Part of ICANN org's mission is to ensure the security, stability, and resilience of the Internet's DNS unique identifiers. ICANN org believes that by increasing the availability of the distribution and publication of the DNS root zone, ICANN is upholding its commitment to its mission.

2.5.6 Formalize the ICANN org Funding Model and Improve Understanding of the Long-term Domain Name Market Drivers

The Global Domains Division (GDD) continues to increase its use of ICANN Community expertise to improve the assumptions and data that go into the financial model.

ICANN org agrees that planning around its budget and funding projection model is an activity that is carried out on an ongoing basis. This intent is reflected in one of ICANN org's strategic goals per its FY21–25 Strategic Plan, which is to develop reliable and predictable funding projections based on a sound understanding of the evolution in the domain name marketplace and realistic assumptions, which it could then utilize to effectively guide the organization.

2.5.7 Implement New gTLD Auction Proceeds Recommendations As Approved by Board

The specific goals and targeted outcomes in the FY21–25 Operating and Financial Plan describe the manner in which ICANN org will approach its work in support of the next stage of the New gTLD Auction Proceeds recommendation implementation.

The goals and targeted outcomes do not refer to the specific distribution of auction proceeds themselves as the Cross-Community Working Group on New gTLD Auction Proceeds (CCWG-AP) has not finalized and submitted its report. This pending work includes recommendations currently under development for goals and objectives of the Auction Proceeds distribution, the overall process, and the evaluation and review processes, in particular under Charter Questions #9, #11, and the related implementation guidance.

The goals and outcomes of the actual distribution of auction proceeds will depend on the final recommendations, approval by the ICANN Board, the eventual mechanism selected, and the results of the implementation phase of this work. The CCWG-AP's work is ongoing.

2.5.8 Monitor Legislation, Regulation, Norms, Principles, and Initiatives in Collaboration With Others That May Impact the ICANN Mission

As part of this ongoing initiative, ICANN org has instituted internal tools and processes to facilitate the identification of national and regional initiatives that could impact ICANN's mission. One recent example of this and the response it permits was the proposed national legislation on data protection and privacy in India. The legislation was flagged, analyzed from a legal and technical standpoint, and ICANN org was able to submit written comments about the potential impact on the operation of the DNS and Indian stakeholders access to services. The letter is posted at <https://www.icann.org/en/system/files/correspondence/marby-to-joint-parliamentary-committee-25feb20-en.pdf> and was also socialized by regional engagement and GDD personnel with the affected stakeholders. Part of the refocusing of the Government Engagement function is the addition of staffing and resources to assist with monitoring IGO and regional activity governmental activity. ICANN org works diligently to understand the social and political landscape of all regions. While it is not possible to anticipate everything and there may be times that new legislation or political and social dynamics occur that ICANN org cannot foresee, the organization will do its best to act efficiently and in a timely manner to understand and address all events of potential impact on its mission.

ICANN org's engagement with governments and intergovernmental organizations (IGOs) does not have any policy agenda. ICANN org has identified three types of engagement with governments and IGOs. These have been endorsed by the Board, consistent with ICANN's mission and Bylaws. They are direct engagement, when a policy or action directly affects ICANN (e.g., pertains to the Domain Name System); engagement with others; where there is a common and beneficial cause (such as working in the Internet Governance Forum) and selective engagement where a global issue (such as cybersecurity or the European Union's General Data Protection Regulation) may well have a direct effect on ICANN's mission and mandate. This targeted engagement — often at the request of a government or IGO — focuses on providing factual information about the operation of the technical underpinnings of the Internet, so that the interested parties understand the potential impact and unintended consequences of government or IGO actions. These engagements are based in ICANN's role and technical responsibility to maintain a single, stable, and interoperable Internet and is consistent with ICANN's mission, commitments and core values. In addition, these engagements offer an opportunity to explain ICANN's role, the multistakeholder model and policy development process and the benefits to the government or IGO to engage in the GAC and participate with the rest of the ICANN community in the policy development process.

2.5.9 Planning at ICANN

The ICANN Board and ICANN org recognize the complexity and the effort that goes into the planning process yearly. Work is underway to improve and simplify the planning, which consist

of the ICANN Five-Year Strategic Plan, the ICANN Five-Year Operating and Financial Plan, and the ICANN Annual Budget.

As part of its planning efforts, ICANN org strives to improve the quantification of resources, evaluation of needs, prioritization, flexibility, and transparency of the management of ICANN's resources and activities over the FY21–25 time frame. Effective cross-functional collaboration is an essential element for success for the Planning Operating Initiative which involves all stakeholders of the ICANN ecosystem, including the ICANN Board, community, org, and the public. ICANN org agrees that with the importance that the ICANN Board has placed upon the current draft proposal on Resourcing and Prioritization of Community Recommendations. ICANN org agrees that both planning and project management will be important activities to support this operating initiative.

ICANN org will evaluate as a deliverable for future planning cycles the inclusion of key lessons learned from the last Five-Year Operating Plan and Budget in this second five years of the planning process.

2.5.10 Promote and Sustain a Competitive Environment in the Domain Name System

As noted in ICANN org's FY21–25 Strategic Plan (<https://www.icann.org/en/system/files/files/strategic-plan-2021-2025-24jun19-en.pdf>), part of the evolution of the unique identifier systems includes ensuring that the systems reach a broad and diverse audience. The expansion of the DNS via a new round of the New gTLD Program is one way that ICANN org has identified to meet that objective. As noted in the targeted outcomes, ICANN expects that with expansion of the DNS, there will be continued investment and innovation via market developments and new registry services. Also noted in the Strategic Plan, are other goals to meet this objective, including: encouraging readiness for Universal Acceptance, IDN implementation, and IPv6; improving assessment of, and responsiveness to, new technologies; and, continue to deliver and enhance the IANA functions.

With regard to studies of the impact of new gTLDs and the New gTLD Program, as noted in the Policy Research section of the functional activities, ICANN org expects to conduct additional work related to the implementation of Competition, Consumer Choice and Trust (CCT) Review Team recommendations, many of which relate to studies of the DNS marketplace and new gTLDs. The ICANN Board most recently approved the implementation plan for Recommendation 1 of the CCT Review Team Final Report ("Formalize and promote ongoing data collection"). Accordingly, ICANN org is currently developing a model for handling data, research, and study project requests from internal and external stakeholders. This is in addition to work already being conducted by ICANN org with regard to DNS studies, such as the Domain Name Marketplace Indicators. More information about those can be found at: <https://www.icann.org/resources/pages/metrics-gdd-2015-01-30-en>

ICANN org is committed to understanding the DNS marketplace and promoting and sustaining competition in that marketplace. Sustaining competition is a targeted outcome of many of the ICANN org Operating and Functional Activities, including Policy Research, Technical Services, and Global Domains Division Strategic Programs.

Finally, ICANN org notes that, as part of development of the FY21–25 Operating and Financial Plan, a marketplace horizon scan was performed to take a comprehensive look at the key factors affecting the DNS industry, which revealed various trends within the industry.

2.5.11 Root Zone Management Evolution

This initiative ('Promote Domain Name System Security Extensions and Increase its Deployment') has since been consolidated under "Facilitate DNS Ecosystem Improvements." This initiative encompasses efforts to understand, document, and improve the emergency readiness of ICANN and other actors in the DNS ecosystem. While one is focused on improvements to the ecosystem as a whole, the other is centered on improving a system used to provide root zone management services.

ICANN org concurs that changes of this nature need to be very carefully considered and rolled out. ICANN org continues to have detailed dialogue with impacted community groups to review the proposed approaches prior to implementation.

The Singapore Cluster does not have a direct impact on the Root Zone Management Evolution activity. IANA will however monitor how it can best utilize ICANN org's overall IT resources in furtherance of its operational objectives.

ICANN org acknowledges that staff retention is vital for the success of the PTI and IANA functions.

2.5.12 Support the Evolution of the Root Server System

ICANN org will coordinate with regional organizations and ccTLDs to ensure success at a regional level.

As all the root servers operators are independent and have their own funding models, it is challenging to provide additional information. With the understanding that ICANN org is not privy to internal discussions of how each of the root server operators are funded, for FY21, there are no known or publicized changes to the root server operator funding models ICANN org is aware of. However, in the context of RSSAC037/038, there is an anticipation of a "Financial Function" that will provide funding to the root server operators in some fashion. The definition of the Financial Function, how it will operate, etc., are all topics that will be undertaken by the recently formed Root Server Governance Working Group. More details of that group can be found at <https://community.icann.org/pages/viewpage.action?pageId=120820189>.

It is a bit unclear what is meant by "customers of the RSS" as it can mean either the TLD registry operators or resolver operators. In both cases, ICANN org agrees that interactions with "customers of the RSS" are important in the understanding of requirements and achieving suitable solutions for those requirements and ICANN org has a number of initiatives aimed at working with both sets of "customers of the RSS." ICANN org will also bring these comments to the RSSAC to take into consideration. It is worth noting that the RSSAC has a mechanism, via the RSSAC caucus, for people outside of the RSS community to be involved with their work and

that this may be a way for the RySG community to at least initially involve themselves in the active discussions taking place.

ICANN org will bring comments from the gTLD Registries Stakeholder Group about the Root Server System to the Root Server System Advisory Committee (RSSAC) to take into consideration. It is worth noting that the RSSAC has a mechanism, via the RSSAC caucus, for people outside of the RSS community to be involved with its work and that this may be a way for community members to at least initially involve themselves in the active discussions taking place.

The Office of the CTO (OCTO) is in the process of finalizing a paper on Hyperlocal root service and its implications, which will be published in the OCTO document series at <https://www.icann.org/resources/pages/octo-publications-2019-05-24-en>.

2.5.13 Through Targeted Engagement Improve Governments and Intergovernmental Organizations (IGOs) Engagement and Participation in ICANN

Government Engagement (GE) works with the Governmental Advisory Committee (GAC) support staff, the GAC, the Underserved Regions Working Group of the GAC, Global Stakeholder Engagement and the Office of the Chief Technology Officer to deliver demand-driven capacity building workshops for GAC members. These workshops assist GAC members in their understanding of the technical underpinnings of the Internet, the ICANN policy development process, and issues of concern to the ICANN community.

2.5.14 Universal Acceptance

Remediation of technology means that efforts will be made to update programming languages and frameworks, email tools and services and applications that use them, such as websites, to be Universal Acceptance (UA) ready.

As a first step, the technology will be measured for UA readiness. Once the gaps are identified, the remediation will take different forms, including the following: For programming languages and frameworks and for the email tools, an outreach effort will be organized to inform their maintainers of the gaps and need for them to support UA readiness. In addition, training will be organized for software developers and email administrators to highlight the UA readiness gaps in deployment of applications and services (including websites and email services) and how to address them.

ICANN org will make a plan for training as suggested. This is already underway in collaboration with the UA Local Initiatives.

ICANN org aims to conduct an annual assessment of results through the UA Steering Group's Measurement Working Group, which will feed into annual action plans.

With respect to the budget figure, the org team has reviewed past year actuals and future work planned and does not believe the budget figure will negatively impact the work plan for the UA Steering Group. Additionally, this budget figure does not include the full time UA manager being hired within GDD to support the UA work.

2.6 Evolve ICANN's Multistakeholder Model Work Plan

Feedback received on each of the questions posed will be considered in the next iteration of the Evolve ICANN's Multistakeholder Model Work Plan process. Also, ICANN org and the Board have taken note of the anticipated recommendations from ATRT3 regarding prioritization of work. Those recommendations will be considered together with the community-suggested prioritization that has been provided as a result of this public comment proceeding. The Board has made this effort a priority moving forward and looks forward to further engagement with the community on this work.

2.6.1 Complexity

ICANN org has identified multiple streams of ongoing work that may help to relieve some of the concerns associated with complexity. The Registry Stakeholder Group comments regarding smaller projects as referenced in Issue B may also be instructive here and will be considered as another approach to fill a gap not yet addressed in this issue area.

2.6.2 Consensus and Representation and Inclusivity

ICANN org has noted the SO and AC concerns regarding the grouping of these issue areas. However, this grouping was initially created at the suggestion of the community during the facilitated phase of the Evolution of ICANN's Multistakeholder Model process

In connection with the work of ATRT3, ICANN org understands that the review team is currently considering what a realistic timeline might be for it to complete its work, given recent changes to the format of ICANN67 and the impact on the ATRT3 work. Additionally, at this point, it is not clear that ATRT3 final recommendations would be addressing the topic of Consensus and Representation and Inclusivity. However, the ATRT3 is expected to make recommendations regarding prioritization, which may help in the overall evaluation of the six issues presented in the Work Plan.

As the resources for each of the six issue areas is determined, and the entities tasked with leading the development of solutions complete their assessments, appropriate budget allocations will be made.

ICANN org notes the gTLD Registries Stakeholder Group support for the GNSO's role in this effort and will be noted in the next iteration of the Work Plan.

2.6.3 Culture, Trust, and Silos

ICANN org and Board appreciate ALAC's willingness to take on the lead role for this issue. The Board will consider the next steps on this project and the range of work underway in support of addressing each of the six issues, particularly as it considers the suggested leads and the public comment received on those suggestions. These inputs and resource suggestions will be useful to the org and Board as next steps on the Work Plan are considered.

Some SOs and ACs have expressed concerns with regard to the ALAC's role in this issue. It is important to note that the entity suggested as the lead is meant to coordinate the streams of work and ensure that the overall issue has been addressed by SOs and ACs.

Also noted are suggestions from the gTLD Registries Stakeholder Group (RySG) about where additional resources may be useful to help build consensus and ultimately trust. These recommendations will be reflected in the next iteration of this work plan. The RySG suggestions to focus on smaller consecutive and overlapping projects will be considered as one of the gaps to fill in addressing this issue in the Work Plan. A community-agreed process for prioritizing specific projects and activities may help to address these points.

2.6.4 Precision in Scoping Work

ICANN org has noted comments regarding the entities (such as the Alumni Leadership Group proposed by RySG) suggested to lead the Precision in Scoping work and will consider each in the next iteration of the Work Plan. Suggestions will be considered to build on the work of PDP 3.0 as one of the streams of work that may address the issue.

2.6.5 Roles and Responsibilities

ICANN org notes the recommendation to focus staff resources on documenting and providing clarity on policymaking and other procedures within ICANN. These resources will be considered as the final Work Plan is developed.

Many members of the community have echoed concerns regarding accessibility of information on ICANN's website. As noted, much work is underway to address these issues. The suggestion of providing the most information updates via a hub on the ICANN.org homepage, as it is done on ICANN's primary Twitter account, will be shared with ICANN's Communications team.

The Business Constituency comments will also be shared with ICANN's Public Responsibility Support team. It is worth noting that among the examples of work currently underway to address Issue A are efforts to enhance the Stakeholder Journey, as well as continued development and support of the ICANN Fellowship Program, and the ICANN Learn platform.

3 Appendix – Contributor Question/Comment and Reference to Response

3.1 Submissions

Contributor	Question / Comment	Reference
Individual	I am respectfully submitting two suggestions for your review and possible adoption that gear to enhance a healthy, safe, and secure digital technology virtual world. The suggestions include: 1) Overhaul of existing third-party registration of ICANN membership with the objective of cancellation, and replacement with direct Domain registration and payment of reasonable and affordable fee into ICANN account than allowing payment into third-party registration account. This is very necessary for security reasons and elimination of fraud.	Thank you for your comment and feedback
Individual	I am respectfully submitting two suggestions for your review and possible adoption that gear to enhance a healthy, safe, and secure digital technology virtual world. The suggestions include: 2) ICANN should introduce in its White papers, strategic security regulations and guidelines as security complexity changes by the day to most troubling online safety and credibility concern. ICANN should develop and make public at its level security and safety guidelines, all of which are independent of IT services providing companies security and safety guidelines. We suggest ICANN may put up suggestions like this to the global public for open discourse, dialogue, and refinement prior to final generally accepted statement version.	Please see Section Functional Activities, subsection Technical & DNS Security
Individual	Need find a way to have more diversity and recruit for headquarter 25% at least of non English to Impact a global activity for everywhere	Please see section Functional Activities, subsection ICANN org Headcount
Individual	The second comment is to have a real budget for ecosystem digital interaction	Please see Section Functional Activities, subsection Community Engagement & Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational	We notice that the headcount remains at 410 HR for the coming five years. While we appreciate the ICANN effort to stabilise the HR, we recommend regular reviews of the HR to evaluate if staff are able to cope with existing and future challenges.	Please see section Functional Activities, subsection ICANN org Headcount

Planning Committee (SOPC)		
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	In terms of the 15 Operating Initiatives of the 35 Targeted Objectives, we still fail to understand whether ICANN has applied prioritisation logic, and whether the allocation of budget takes into account their importance. As a matter of fact, we believe that not all the Operating Initiatives are equally important. A cost/benefit analysis of each Initiative may facilitate the understanding of its relevance against the Objectives.	Please see Section Budget Development Process & Document Contents/Structure
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	The Operating Initiatives seem like a balanced scorecard but without the 'balancing'; furthermore, it is unclear how measurable these Operating Initiatives and Targeted Objectives/activities are. Adding clear KPIs in all cases will be an extra step towards transparency. We encourage ICANN to set a publicly available scorecard for each part of the Operating Plan, to enable the community to keep track of the progress of the Initiatives, as it has been done in the past. The tracking mechanisms presented in the Plan are quite limited. A final, high-level report of the previous Operating Plan cycle would be desirable to have an overview of the achievements, changes in the Plan, and, above all, lessons learnt.	Please see Section Budget Development Process & Document Contents/Structure
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	In terms of resources allocated to the Initiatives, we would recommend intermediate levels between the low and high estimates for each.	Please see Section Financial Management, subsection operational Initiative Forecasting
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	We encourage ICANN to introduce a specific objective and initiative to become a fully environmental-committed company that monitors its carbon footprint and promotes green values across its system, starting from the meetings that are held at worldwide level.	Please see Section Functional Activities, subsection Community Engagement & Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	The five-year financial estimate for the Operating Initiatives includes Mid-point, High and Low figures. We wonder what the assumptions behind these figures are. For some Operating Initiatives, High and Low figures are just +/- 33 %, but for others the proportion is different.	Please see Section Financial Management, subsection operational Initiative Forecasting

<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>The Strategic Plan FY 21-2025 document uses ‘top-down’ presentation: Strategic Objective > Strategic Goals > Targeted Outcomes. The Operating Initiatives described in Operating Plan are connected with Targeted Outcome, but there is no clear explanation about the Strategic Goal and Objective /SO that each Operating Initiative should support. As such, the reader takes additional time and effort to find the connection and to understand whether Strategic Goals are supported by Operating Initiatives. It would be useful to have information (possibly a user-friendly, accessible infographic) to show the connection between Operating Initiatives, Strategic Goals and Strategic Objectives.</p>	<p>Please see Section Budget Development Process & Document Contents/Structure</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>Additionally, if Strategic Objectives, Strategic Goals, Operating Initiatives and Targeted Outcomes were numbered, it would be easier to refer to them and find matches during review.</p>	<p>Please see Section Budget Development Process & Document Contents/Structure</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>We were not able to find any Operating Initiative that aims to support the following Targeted Outcomes mentioned in Strategic Plan: ICANN org’s geographical presence and international strategy continue to effectively support ICANN’s global community. Widespread understanding of the ICANN multistakeholder model is established through increased communication with relevant organizations and institutions. (from the description of Strategic Goal “Sustain and improve openness, inclusivity, accountability, and transparency”, Strategic Objective “ Improve the effectiveness of ICANN multistakeholder model of governance”). ICANN has processes and tools in place to effectively prioritize and periodically reprioritize its work. Community’s engagement in prioritization and decisions about affordability measurably increases. Funding, expenses, and reserves are addressed in each plan in a manner consistent with policies, Board decisions, strict financial responsibility, and conservatism. (from the description of Strategic Goal “Sustain and improve openness, inclusivity, accountability, and transparency”, Strategic Objective" Ensure ICANN's long-term financial sustainability")</p>	<p>Please see Section Budget Development Process & Document Contents/Structure</p>
<p>Country Code Names Supporting Organization</p>	<p>The purpose of this initiative is rather vague, on the same level as the Strategic Goal. The KPIs of the</p>	<p>Please see Section</p>

(ccNSO) - Strategic and Operational Planning Committee (SOPC)	section 'How progress is tracked' are all quantitative rather than qualitative (recurring SOPC comment).	operational Initiatives, subsection Evolve and Strengthen the ICANN Community's Decision-making Processes to Ensure Efficient and Effective Policy-making
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	<p>It seems that this Operating Initiative aims to ensure the implementation of Strategic Goal Strengthen ICANN's bottom-up multistakeholder decision-making process and ensure that work gets done and policies are developed in an effective and timely manner (only Targeted Outcomes 'ICANN Board and org continue enhancing transparency initiatives and upholding accountability', 'ICANN community enhances their transparency practices to increase cross-community accountability and trust').</p> <p>The objective and scope of 'Ethics Policy' remains unclear. We believe that the equivalent to an Ethics Policy for the community already exists, for example 'Expected Standards of Behavior'. Given this fact, there is a need to define what kind of 'policy' ICANN.org is going to develop further. The efforts to establish the perfect 'Ethics Policy' may become endless. The SOPC has already commented, during the first public comment period in July 2019, suggesting that this should fall under the 'Operating Activities' (currently renamed 'Functional activities') and we still believe that it should.</p>	Please see Section Operational Initiatives
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	We fail to see the logic between the next application window/the new gTLD Programe and the evolution of the unique identifier systems/competitive environment. We recommend ICANN develops more sound studies about the past and future impact of new gTLDs.	Please see Section operational Initiatives, subsection Promote and Sustain a Competitive Environment in the Domain Name System
Country Code Names Supporting	Certain elements of the initiative seem to overlap and/or be similar with the Operating Initiative	Please see

<p>Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>'Promote Domain Name System Security Extensions and increase its deployment'.</p>	<p>Section operational Initiatives, subsection Root Zone Management Evolution</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>It seems that this Operating Initiative aims to ensure the implementation of Strategic Goal Foster competition, consumer choice, and innovation in the Internet space by increasing awareness of, and encouraging readiness for Universal Acceptance, IDN implementation, and IPv6. We would like to have more in-depth explanation on the steps that are mentioned in the section HOW PROGRESS IS TRACKED. With reference to the action 'Undertake remediation of technology over FY21 to FY23', we would appreciate clarification on the meaning of 'remediation of technology'.</p> <p>Regarding the training foreseen in the Initiative, the Plan should be more specific about its distribution and possible target attendees.</p> <p>We believe that at least one review and assessment of the results should be conducted during the five-year period, with the aim of checking the effectiveness of the efforts and, eventually, adjusting the communication strategy (i.e. is the technical community still the target audience or the focus should be moved to web-site holders and end-users?).</p> <p>We are surprised and concerned to see a reduction of the expenses allocated to these initiatives: the UA budget in FY 2020 is 1.2 million vs only 0.4 million per year in FY 2021-2025.</p>	<p>Please see Section operational Initiatives, subsection Universal Acceptance</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>This Initiative is a copy of similar actions that ICANN has committed to develop in past Plans. Nevertheless, it would be highly desirable that the findings of the first two actions (FY21: Complete a cross-functional inventory of relationships in the Internet ecosystem and FY21 to FY22: Assess the current mechanisms and identify gap) under 'How Progress is tracked' are shared with the community when the yearly Operating Plans are produced.</p>	<p>Please see Section operational Initiatives</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic</p>	<p>It seems that this Operating Initiative aims to ensure the implementation of Strategic Goals Identify and address global challenges and opportunities within its remit by further developing early warning systems,</p>	<p>Please see Section Budget Development</p>

<p>and Operational Planning Committee (SOPC)</p>	<p>such as ICANN org’s Legislative and Regulatory Development Reports and Continue to build alliances in the Internet ecosystem and beyond to raise awareness of and engage with global stakeholders about ICANN’s mission and policymaking.</p> <p>The entire ‘How the progress is tracked’ is a deja-vu from past Plans. In further detail, we would like clarity on certain KPIs, beginning with ‘Metrics related to the number of countries and intergovernmental organizations represented in the GAC as well as the number of countries and IGOs actively participating in GAC and ICANN policy processes.’</p>	<p>Process & Document Contents/Structure</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>It seems that this Operating Initiative aims to ensure the implementation of Strategic Goals Identify and address global challenges and opportunities within its remit by further developing early warning systems, such as ICANN org’s Legislative and Regulatory Development Reports. The Initiative is far too broad, making it overly ambitious. ICANN itself acknowledges the challenges of delivering against this Initiative. In the Considerations section is found the following: ‘Limited ability to provide briefings, technical trainings, and other engagement efforts in some political structures’. We would sincerely recommend that ICANN learns from lessons from the past (e.g. GDPR legislation by the EU) to properly train its staff in the regional hubs to anticipate the possible implications of local and/or international legislations on its work and/or on stakeholders.</p>	<p>Please see Section operational Initiatives, subsection Monitor Legislations, Regulations, Norms, Principles, and Initiatives in Collaboration With Others that May Impact the ICANN Mission</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>It seems that this Operating Initiative aims to ensure the implementation of Strategic Goals Implement a five-year Financial Plan that supports the five-year Operating Plan and Develop reliable and predictable funding projections.</p> <p>We would recommend ICANN continue to rely on the intelligence that might be provided by the various stakeholder groups in terms of understanding the long-term domain name market drivers. Again, the intelligence produced at the CENTR membership level has proven to be sound and very professional. A regular session at each ICANN meeting with DNS industry leaders could help ICANN in this task significantly.</p>	<p>Please see Section operational Initiatives</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational</p>	<p>None of the items listed in this section of the Plan under ‘goals and targeted outcomes’ are in fact measurable, so there are no targets. Additionally, none of these items seem to be a direct outcome of the Initiative. While we strongly believe that Auction Proceeds will be allocated in accordance with</p>	<p>Please see Section operational Initiatives</p>

<p>Planning Committee (SOPC)</p>	<p>principles mentioned among targeted outcomes (i.e. 'Funding, expenses, and reserves are addressed in each plan in a manner consistent with policies, Board decisions, strict financial responsibility, and conservatism' and 'ICANN prioritizes its activities to deliver its mission in the global public interest in the most cost-effective way'), the proceeds will most probably be spent to support projects in other areas.</p> <p>The targeted outcome for this initiative should be derived from the Proposed Final Report of the new gTLD Auction Proceeds Cross Community Working Group https://www.icann.org/en/system/files/files/proposed-new-gtld-auction-proceeds-final-23dec19-en.pdf that mentions the following: 'Benefit the development, distribution, evolution and structures/projects that support the Internet's unique identifier systems; Benefit capacity building and underserved populations, or; Benefit the open and interoperable Internet.'</p> <p>We fail to see how the items listed in the Plan follow up on the recommendations.</p>	
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>The Complexity of ICANN at the organisational level and, consequently, the complexity of the planning process makes meaningful contributions from the community difficult – perhaps even impossible – and limited in scope. Therefore, we strongly recommend that ICANN includes 'How to make the planning processes more accessible to the community' as a key goal of this Initiative.</p>	<p>Please see Section operational Initiatives, subsection Planning at ICANN</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>We commend the ICANN Finance team for having a plan that follows up on what has been agreed.</p>	<p>Please see Section operational Initiatives</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>Does ICANN.org need to spend 18 million USD a year to consultants under 'professional services'?</p>	<p>Please see Section Financial Management, subsection Professional Services</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational</p>	<p>Does ICANN need all these offices worldwide? Their added value should be assessed regularly as we do not see a precise, long-term strategy about local presence.</p>	<p>Please see Section Functional Activities, subsection</p>

Planning Committee (SOPC)	In the FY 2021 Budget we have not found any data on expenses by Operation Initiative.	Community Engagement & Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	The highlights of the FY21-25 Operating & Financial Plan and FY21 Budget documents mention 35 Functional activities. However, we have counted 36.	Please see Section Budget Development Process & Document Contents/Structure
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Office of the CTO Breaking the operational activities into external and internal operations is appropriate and should be kept throughout all other sub-sections. Providing support, training, engagement and outreach is an excellent idea. We recommend ICANN coordinates these efforts with other bodies already committed to similar actions, including regional organisations (ROs) to achieve maximum impact.	Please see Section Functional Activities, subsection Technical & DNS Security
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	ICANN Managed Root Server We believe that (Item 1) 'Supporting the evolution' and (Item 2) 'Facilitating improvements of the DNS ecosystem' must include coordination with ccTLDs to increase the chances of success at a local level. The mid-point level of invest of \$ 4.5 and 6.0 million USD seems a good starting point. Tracking the number of ICANN Managed Root Servers (IMRS) instances deployed annually is one good measure of achieving the objective. Concerns about hiring and retaining personnel may be offset by collaborating with the technical arms of ROs and/or ccTLDs.	Please see Section operational Initiatives, subsection Facilitate DNS Ecosystem Improvements
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Internationalized Domain Names and Universal Acceptance Developing and undertaking training for technology developers and email tools for service providers to promote Universal Acceptance (UA) readiness is a much-needed activity to increase the inclusion of the next billion users. Again, full coordination with ccTLD at the local level would be valuable to achieve the desired objectives.	Please see Section Functional Activities, subsection Technical & DNS Security
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	IANA Functions "Activities" and "How the Progress is Tracked" sections duplicate each other. Considerations: one of them, namely 'Losing personnel' can significantly impact the function. Most roles in the team lack redundancy and filling positions when personnel depart has often proved challenging. This element	Please see Section Functional Activities, subsection Technical & DNS Security

	<p>seems to be particularly worrisome and is not mirrored in the respective Strategic Goals. Collaborating agreements with the technical committees within the ROs may reduce the risk of loss of personnel.</p>	
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>Policy Development and Advice With reference to ‘Providing neutral advice on procedural and strategic approaches for successful consensus-building and effective policy outcomes’, ICANN is not supposed to be an arbiter – rather, it should be an unbiased advisor. The statement ‘Professional services are a cost-effective, flexible way to supplement full-time personnel resource requirements and allow for organizational efficiencies in driving improvement efforts and should be considered along with additional hiring’ (p.80) seems to contradict the statement about technical and DNS services on pages 73-74 that states ‘in-house services ensure economies of scale’. Is the conflict due to the different nature/features of these different departments’ operation?</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>Policy Research Why is the focus exclusively on new gTLDs?</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>Global Domains Division Strategic Programs Interest and participation in the new gTLD Program measurably increase as indicated by inquiries and new entrants in the round- whether it is a strategic objective or a desired outcome is not clear.</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)</p>	<p>Constituent and Stakeholder Travel We fail to see how ICANN measures the success of the financial support to constituent and stakeholder travel (recurring SOPC comment).</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>
<p>Country Code Names Supporting Organization (ccNSO) - Strategic and Operational</p>	<p>Community Engagement and Services - The concept of resource optimisation is completely missing from the entire service</p>	<p>Please see Section Functional Activities, subsection</p>

Planning Committee (SOPC)		Community Engagement & Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	<p>Global Stakeholder Engagement</p> <p>“Each regional office needs one team member added to support its work” is too general of an estimation. Increased funding needed for GSE should also include ccTLDs, not only new gTLDs.</p> <p>Close collaboration with ROs can increase local presence while increasing the number of capacity development and training events to regional stakeholders.</p> <p>Close collaboration with ROs can maximize DNSSEC regional training and local adoption by TLDs, ISPs, and others.</p>	Please see Section Functional Activities, subsection Community Engagement & Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	<p>Regional Offices</p> <p>This could be merged with item 1, because their targets are almost identical.</p> <p>Collaboration to address engagement gaps (with ROs), develop an engagement gaps matrix, and incorporate into an organisation-wide platform is an excellent initiative.</p> <p>Consider a collaboration with ROs to reduce the need for resources such as regional personnel, administrative support, shared office spaces for face-to-face meetings.</p>	Please see Section Functional Activities, subsection Community Engagement & Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	<p>Public Responsibility Support</p> <p>The Fellowship program is an excellent vehicle to get more ccTLD operators to participate in-person in ICANN meetings.</p>	Please see Section Functional Activities, subsection Community Engagement & Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	<p>Consumer Safeguards</p> <p>With reference to DNS security threats and combating DNS abuse, we recommend proper interaction with the ccTLD community as this is an area of increasing importance for us.</p>	Please see Section Functional Activities, subsection Community Engagement & Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	<p>Global Communications and Language Services</p> <p>We suggest ICANN coordinates the actions with ROs to improve the use of translated materials.</p>	Please see Section Functional Activities, subsection Community Engagement &

		Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Board Activities We recommend reviewing this section to include corporate governance, accountability and integrity mechanisms as well as a code of conduct.	Please see Section Functional Activities, subsection ICANN org Governance
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Office of the President and CEO No reference to the internal communication function within ICANN.org.	Please see Section Functional Activities, subsection Community Engagement & Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Complaints Office The Complaints Office handles complaints regarding ICANN org that do not fall into an existing complaint mechanism, such as Contractual Compliance, Request for Reconsideration, or the Office of the Ombudsman. The establishment and operation of this Office should still be questioned. According to its intermediate report, there have been 36 complaints filed and considered since its onset (i.e. roughly 12 per year). Meanwhile, the number of its staff remains unidentifiable and thus also its current and projected effectiveness.	Please see Section Functional Activities, subsection ICANN org Governance
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Strategic Planning and Strategic Initiatives There is no reference to the review of the implementation of past strategic initiatives and projects. A review of trends is not sufficient to streamline and improve operation.	Please see Section Functional Activities, subsection ICANN org Governance
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Accountability Reviews The recommendations must be prioritised and their effectiveness evaluated.	Please see Section Functional Activities, subsection ICANN org Governance
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Operations Planning Internal Audit & Control may require additional resources. We believe that this function should also report to the Audit & Governance committee to ensure checks on the work performed. Systems to increase oversight and add additional insight on effectiveness are hard to challenge.	Please see Section Functional Activities, subsection ICANN org Shared Services

Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Finance and Procurement It is believed that resources are expected to increase in FY21 but it is not clear where the need is greatest.	Please see Section Functional Activities, subsection ICANN org Shared Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Engineering and Information Technology There is a shift to trying to make the team and associated projects led by internal staff. There is no issue with that, but it is believed that we should support them in funding career training and development; otherwise there will be hiring and retention issues.	Please see Section Functional Activities, subsection ICANN org Shared Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Global Human Resources and Administrative Services It is surprising to learn that of the 35 offices, 19 are US state offices. There must be opportunities for consolidation (this also applies to offices located outside the US).	Please see Section Functional Activities, subsection ICANN org Shared Services
Country Code Names Supporting Organization (ccNSO) - Strategic and Operational Planning Committee (SOPC)	Security Operation An absence of cyber security strategy or focus was identified. Consequently, a clear explanation is required in order to know more about what they are doing to keep the business and related operations secure. The narrative of this section suffers from a considerable gap.	Please see Section Functional Activities, subsection ICANN org Shared Services
Individual	Secondly, I also note the overall conservative yet well-considered nature of the planned expenditure, from modest growth predictions, for these operational and strategic activities overall, (a reflection of course of the highly professional work of the team involved with the Plans development and production, however concerning Budget Contingency provision, specifically for New gTLD Subsequent Procedures policy development process • Specific and Organizational Reviews • Policy development and compliance required by the European Union’s General Data Protection Regulation • Cross Community Working Group on Enhancing ICANN Accountability Work Stream 2, all of which I admit I have a keen interest or involvement with, does give me slight I hope unfounded concern, that it may be too conservative and risk some diminution of possible progress or commitment to these activities as they come into play quite possible as processes and projects that overlap in time. Perhaps consideration or a higher provision percentage and then not exceeding expenditure being seen as good fiscal management	Please see Section Financial Management, subsection Contingency

	would be a preferred approach, on these key/critical matters. This would have the added benefit of not risking as likely the need to as was required previously to 'dip into the Reserve Funds to complete time-critical ICANN/Community activities.	
Individual	<p>Regarding the Annexed Document "Evolving ICANN's Multistakeholder Model Work Plan:" my brief responses to the specific questions posed follow:</p> <p>1. Are the right entities suggested to take the lead in developing an approach or solution to an identified issue? If not, which entity would be appropriate?</p> <p>Yes, I believe they are, providing that each sees themselves as the convenor or prime facilitator of an ICANN Community-wide interactive process, that engages the ICANN.Org and relevant staff support.</p>	Please see Section Evolve ICANN's Multistakeholder Model Work Plan
Individual	<p>Regarding the Annexed Document "Evolving ICANN's Multistakeholder Model Work Plan:" my brief responses to the specific questions posed follow:</p> <p>2. How can the ICANN community effectively coordinate the work of developing approaches and solutions?</p> <p>Communication and opportunity for equitable input and interaction (a mix of Face to Face and intercessional work) will be key to this if it is going to be effective or successful within the ICANN-MSM model. Change is always resisted by some in any situation and experienced facilitators or change agents might also be a useful tool to deploy in various stage of these processes</p>	Please see Section Evolve ICANN's Multistakeholder Model Work Plan
Individual	<p>Regarding the Annexed Document "Evolving ICANN's Multistakeholder Model Work Plan:" my brief responses to the specific questions posed follow:</p> <p>3. How should the six issues included in the work plan be prioritized?</p> <p>As one of the Co-Chairs of ATRT3 that is going to make recommendations regarding prioritisation of Key ICANN Activities and Review Team/ CCWG etc., Recommendations to date, I would recommend that specifics of that proposal are applied to these six issues being triaged (sorted in order of action) But my personal view of matters to be addressed would be:-</p>	Please see Section Evolve ICANN's Multistakeholder Model Work Plan

	<p>1. 1st ICANN deal with #6 the delegation of Roles and Responsibilities, (ensuring wider ICANN Community 'buy-in');</p> <p>2. 2nd #5 Precision Scoping (now that GNSO Council has Resolved adoption of PDP 3.0) it is essential to establish with the wider ICANN Community what their opinions/acceptance/reactions to the details of PDP3.0 is across the ACSOs, but also but the most fragile of many of our process plans in ICANN seems to me to be a problem with proper scoping of planned activities. It could be effective and efficient to also deal with #4 Complexity as an issue in parallel with the mater of Scoping.</p> <p>3. 3rd #1 Consensus, Representatives and Inclusivity, may to some extent be a product of the success (or not) of the other Community interactions relating to the identified Issues. But this could be addressed in parallel to others identified.</p> <p>4. #2 Prioritisation and Effective Use of Resources and #4 Culture Trust and Silos could be addressed as Overarching issues throughout a process that ques the other matter.</p>	
<p>At-Large Advisory Committee (ALAC)</p>	<p>It is good to have a five-year financial plan which allows everyone to plan ahead. However, for some ICANN incomes and expenses a crystal ball may be needed to forecast five years in advance. Here are some issues concerning the plan:</p> <ul style="list-style-type: none"> • Travel, Professional Services and Administration Costs are steady; thus, inflation rates are not considered. However, it is worth noting that ICANN's largest offices are in the United States, where inflation for 2019 was 2%, whereas other offices around the world have lower or higher inflation rates than the United States. <p>2019 inflation rates for countries where ICANN offices are located:</p> <ul style="list-style-type: none"> Uruguay 8% Singapore 2% United States 2% Turkey 15% Belgium 1.4% 	<p>Please see Section Financial Management</p>
<p>At-Large Advisory Committee (ALAC)</p>	<p>One of the assumptions made is, "New gTLDs were a key enabler of market growth over the past five years", but according to the numbers shown in the GDD Metrics Report that is not the case. Although the growth of New gTLD domains seems important, it only accounts for less than 15% of the total gTLD domains. It is difficult to measure how many registries and registrars are directly correlated to a legacy</p>	<p>Please see Section Funding, subsection New gTLDs</p>

	gTLD, new gTLD or ccTLD; but new gTLDs account for barely 7% of total domains.	
At-Large Advisory Committee (ALAC)	The above table shows a decrease in new gTLD growth; very steady rate in legacy gTLD domains, and continually growing ccTLD domain rate. A graphic of TLD numbers is below, based on the data of the report, where this trend can be accurately observed. There are a worst, best and base scenarios taken in account in the plan, but they do not seem to be correlated with these figures:	Please see Section Funding, subsection Forecasting
At-Large Advisory Committee (ALAC)	Personnel is increasing from 405 to 410, according to the numbers, but the actual personnel figure is around 390, so the actual increase from today's staff count is 20 people (roughly 5%).	Please see section Functional Activities, subsection ICANN org Headcount
At-Large Advisory Committee (ALAC)	Travel, Professional Services and Administration costs are decreasing. Usual figure is that these costs increase due to inflation, especially when there are offices in countries with double digit inflation rates (2019 Inflation figures: Uruguay 8%, Singapore 2%, United States 2%, Turkey 15%, Belgium 1.4%).	Please see Section Financial Management
At-Large Advisory Committee (ALAC)	There is not an exact correlation between the number of domains and the income of ICANN. ICANN relies upon the number of contracted registries and registrars and the number of domains. a gTLD has. When the financial trends are crossed with GDD metrics they do not appear to be aligned. A 4.1% growth in a legacy gTLD or a 2.4% growth in new gTLD is in the plan, versus a 1% growth in legacy gTLD and 2% decrease in new gTLDs in the last 6 months. Yes, they seem more in line with last five-year Compound Annual Growth Rate (CAGR), but this number is rapidly decreasing.	Please see Section Funding
At-Large Advisory Committee (ALAC)	Accreditation fees seem to be accurate, however the last change was in 2013.	Please see Section Funding, subsection Forecasting
At-Large Advisory Committee (ALAC)	There seems to be a typo on "Total ICANN Overview – Total Funding" (p. 29) numbers are not in line with gTLD numbers on previous pages (p. 25); new gTLD FY20 is 5.3, and FY 21 5.1, according to previous pages, but on the table they are listed as 11.7 and 5.1 respectively. A declining budget instead of a flat budget should be shown.	Please see Section Funding, subsection Forecasting
At-Large Advisory Committee (ALAC)	On the last page, expenses by functional activity for FY21 are very difficult to understand, since at the end there is an attrition figure with an adjustment in the	Please see section Functional Activities, subsection ICANN

	number of total personnel, without explanation of their functions.	org Headcount
At-Large Advisory Committee (ALAC)	Thank you for the opportunity to respond to Appendix C of the Draft FY21-25 Operating and Financial Plan. The At Large is committed to working towards developing structures designed to help resolve the issues which have been identified by the community as major stumbling blocks to the evolution of CANN's multistakeholder system. This community does want to register it's surprise and disappointment at seeing this important subject, which has been such a major topic of discussion over the past year, now relegated to an appendix in another major request for comment -- the Draft FY21-25 Operating and Financial Plan -- in which it is unlikely to get the time and attention it deserves from the community.	Please see Section Evolve ICANN's Multistakeholder Model Work Plan
At-Large Advisory Committee (ALAC)	This comment will not be dealing with all six issues in depth. Due to lack of time and resource persons to do the work we have decided to focus on two of the issues -- consensus & representation and inclusivity and culture, trust and silos . With respect to the remaining issues: prioritization of work and efficient use of resources; complexity; precision in scoping; and roles and responsibilities -- we agree with the assignment of leads but will not be commenting on how the work needs to be coordinated. We suggest that this kind of work be done through focus groups composed of representatives from the relevant communities constituted for this purpose.	Please see Section Evolve ICANN's Multistakeholder Model Work Plan
At-Large Advisory Committee (ALAC)	On the subject of culture, trust and silos, the issue for which the ALAC, working with ACs/SOs has been asked to take the lead, we are pleased to report that, during recent discussions (CPWG call, Jan. 15), an overwhelming number of the 60 At Large attendees agreed that ALAC could accept the role being offered -- with the condition that adequate resources to do this would be made available, particularly in the area of logistical support, especially the support of professionals in the field of team building, as well as meeting space and expenses incurred during the performance of this work. We recognize that we are not tasked with solving the problems but rather with ensuring that efforts are made along clear and transparent lines designed to further work in this area, and with reporting on the progress of the work. We believe we are well-positioned to do this work as one of our primary tasks in the ICANN ecosystem is to reach out, educate, promote and engage with the wider community.	Please see Section Evolve ICANN's Multistakeholder Model Work Plan

	<p>These skills and processes can serve the whole community well in any effort to break down silos and further trust within the community.</p>	
<p>At-Large Advisory Committee (ALAC)</p>	<p>As mentioned in the document, lack of trust between various ICANN constituencies has been recognized and acknowledged in representations from multiple stakeholders. This is a problem that is well-entrenched. It will require cooperation on all sides to bring forward structures and processes that will begin to change that culture. The first step in this journey will be an agreement by SOs and ACs on the definition of success and the stages of success in this endeavour.</p> <p>We do not believe that this is an exercise to try to convince everyone to “just try to get along.” This must be an exercise in building a commitment to principles of constructive engagement/ effective participation among the multiple stakeholders. Some suggestions around requirements for such participation are presented in the excerpt from an IETF study quoted below.</p> <p>In this task, accessing the right resources will be key. As has been noted in the paper, some tools are already available which could be refocused on addressing the problem of culture, trust and silos. One of these would be Meeting B -- promoted as the community meeting in the schedule of ICANN face to face gatherings. An agreed upon amount of time at this meeting should be used for focus group sessions that will be needed in order to initially define the scope and trajectory of the work and then work through implementation stages.</p> <p>Recently, there have been some experiments towards more cross-community fertilization. The leadership team for work track 5 (subsequent procedures) was a successful attempt at making sure all groups were represented on the leadership team. Cross-community membership in the workgroups, as well as the ability for all kinds of members to participate, must also be encouraged. Recommendations from the IETF study quoted below are also relevant here.</p> <p>As the lead entity on this issue, we would wish to engage with professionals in the field of team-building. This kind of activity is common in large corporations and there will be various services to</p>	<p>Please see Section Evolve ICANN’s Multistakeholder Model Work Plan</p>

	choose from. We would seek to have input on who is chosen to help facilitate this work.	
ICANN At-Large Advisory Committee (ALAC)	The At Large community is somewhat less unified with respect to the combined group of issues called consensus and representation and inclusivity which has been allocated to the GNSO working with SOs and ACs. Much of the discomfort centers around the coupling of recruitment and demographics with representation and inclusivity. We agree with the general community comments that have strongly indicated that these are two related but different streams. At Large is intimately familiar with all the issues around recruitment and demographics including growth, diversity, participation and integration. Our thoughts in this area formed a large part of our response to the previous request for comments on this issue.	Please see Section Evolve ICANN's Multistakeholder Model Work Plan
At-Large Advisory Committee (ALAC)	<p>The GNSO is the central stakeholder group as far as policy is concerned. The At Large comments on policy produced through the PDP process while also addressing wider issues. Both groups do policy, both groups do outreach. The work can be similar and we are seeking volunteers with similar skills. Demand for engaged volunteer members always outstrips supply. This has led to an atmosphere of competition between At Large and the GNSO groups like NCUC, NPOC and NCSG which also depend on volunteers.</p> <p>We feel that the issues of representation, inclusivity, recruitment and demographics intersect with the issue of the culture, trust and silos. We recognize the need to spread the workload and agree with the assignment of GNSO as lead stakeholder group. However, due to the competition outlined above, we have strong concerns that we will not be heard or have sufficient influence on the outcome. In an effort to deal with this problem, we suggest that the order in which we address the two issues highlighted in this submission could be the key to overcoming this barrier. Given the timelines proposed for addressing this work, it is unlikely that there will be a linear progression. We do suggest, however, that work on the trust issue should be underway as a lead up to addressing the representation and inclusivity issue which includes recruitment and demographics.</p> <p>In our previous intervention, we spoke at length about the need to make sure participants are actually ready to participate and the kinds of tools that are necessary to enable participation. We would add to</p>	Please see Section Evolve ICANN's Multistakeholder Model Work Plan

	<p>that the following excerpt from a document arising from the need to address similar issues of engagement and participation at the IETF (2015). These are the kind of mechanisms that need to be in place to enable constructive engagement:</p> <p>“... Processes that promote free-ranging discussion, tease out new ideas, and tackle concerns should be promoted. This will also run to:</p> <ul style="list-style-type: none"> o Encouraging contributions from timid speakers o Showing warmth for new contributors o Preventing dominance by, or blind deference to, those perceived as the more senior and authoritative contributors o Actively shutting down derogatory styles <p>It is important that participants be facilitated in tendering their own ideas readily so that innovation thrives.”</p> <p>RFC 7704 - An IETF with Much Diversity and Professional Conduct</p>	
<p>At-Large Advisory Committee (ALAC)</p>	<p>The community has also been asked to rank issues with regard to implementability with the “low hanging fruit” to be ranked first. The At large community would prefer not to rank these issues before the release of the work of the ATRT3 and PDP3 working groups. We note that the final report of the ATRT3 review is about to come forward with specific proposals and recommendations which drill down into the issues of complexity, prioritization and scoping. The report of PDP3 will address the consensus issue and, to some extent, representation & inclusivity. The extent to which the community is comfortable with the forthcoming recommendations and how they will impact the MSM topics will determine the ease with which they can be implemented.</p>	<p>Please see Section Evolve ICANN’s Multistakeholder Model Work Plan</p>
<p>At-Large Advisory Committee (ALAC)</p>	<p>One final note with regard to the budget allocated to this project over 5 years, \$4.3M US\$ (mid-range figure): we feel that there must be flexibility in how these funds are allocated over the time frame. We suggest that the early stages of this exercise should be generously funded even if it leaves somewhat less in the final years. The importance of getting up and running quickly will be instrumental to success and that early successes will give the project the momentum it will need to realize its goals.</p>	<p>Please see Section Evolve ICANN’s Multistakeholder Model Work Plan</p>
<p>Registrar Stakeholder Group (RrSG)</p>	<p>The RrSG notes that from the FY20 adopted budget to the FY21 Draft budget, the costs of personnel increases by \$2 million, with \$1.6 million of this being from the ‘...impact of Merit/Fringe benefit increases and new hires’. This is significant given the FY21 Draft budget anticipates only 5 additional personnel. It</p>	<p>Please see section Functional Activities, subsection ICANN org Headcount</p>

	<p>is not clear what constitutes a ‘fringe’ benefit, whether these benefits are given to all or only executive personnel, nor what percentage of the amount would be going to new vs existing personnel, or the intended compensation for these hires. Personal costs represent more than 50% of the FY21 Draft budget while average headcount had increased over the past 3 years. However, it is unclear whether ICANN Org carries out reviews of existing headcounts to assess whether a particular resource/position is optimal or even justifiable. One example of this would be ICANN's Complaints Office which received a grand total of 8 complaints in 2019, according to https://www.icann.org/complaints-report. Another example is the Consumer Safeguards Director position, about which there was a significant ambiguity over the role, function, and deliverables. The RrSG would like to see more transparency around personnel costs and efficiency, particularly when the budget increases are this notable.</p>	
Registrar Stakeholder Group (RrSG)	<p>The RrSG is pleased to see that the Financial Projections show no excessive increases, although there is not a lot of detail on how ICANN Org have arrived at the amounts specified. As RrSG has noted in several previous budgetary comments, there should be more transparency around how funds are expected to be spent.</p>	<p>Please see Section Budget Development Process & Document Contents/Structure</p>
Registrar Stakeholder Group (RrSG)	<p>Are the right entities suggested to take the lead in developing an approach or solution to an identified issue? If not, which entity would be appropriate? The RrSG supports the proposed entities suggested to take the lead for issues A, B, D & F.</p>	<p>Please see Section Evolve ICANN's Multistakeholder Model Work Plan</p>
Registrar Stakeholder Group (RrSG)	<p>With regards to issue E (Precision in Scoping), we reiterate our previous comments that 'Specific to gTLD policy development, the GNSO Council PDP 3.0 is currently developing improved processes to result in more effective scoping of issues within Policy Development Process charters'. The chartering organization should be leading Issue E.</p>	<p>Please see Section Evolve ICANN's Multistakeholder Model Work Plan</p>
Registrar Stakeholder Group (RrSG)	<p>With regards to issue C (Culture, Trust and Silos), the RrSG has some concerns that ALAC, or any one ICANN group, be given the responsibility for coming up with solutions for it. Whilst we recognise that ALAC has significant engagement experience and would certainly know how to make good recommendations for internal group work, this is a cross-constituency issue, which ALAC, like all ICANN groups, has had difficulties with. Due to the very nature of this issue, it would benefit from neutral and independent</p>	<p>Please see Section Evolve ICANN's Multistakeholder Model Work Plan</p>

	leadership (or a diverse cross-constituency representation).	
Registrar Stakeholder Group (RrSG)	<p>How can the ICANN community effectively coordinate the work of developing approaches and solutions?</p> <p>Work on the issues should be staggered, with each limited for efficiency to a 6 month timeline that includes any proposed approaches or solutions being ready for community discussion at an ICANN Meeting. Ideally with the top 1 or 2 issues being ready by the AGM in 2020.</p>	Please see Section Evolve ICANN's Multistakeholder Model Work Plan
Registrar Stakeholder Group (RrSG)	<p>How should the six issues included in the work plan be prioritized?</p> <p>Following on from prior comments the RrSG believes the six issues should be prioritized as follows: (1) B Prioritization of work + Efficient Use of Resources (2) A Consensus + Representation and Inclusivity (3) C Culture, Trust and Silos (4) E Precision in scoping work (5) D Complexity (6) F Roles and Responsibilities</p>	Please see Section Evolve ICANN's Multistakeholder Model Work Plan
Business Constituency (BC)	<p>The BC notes that the ICANN FY21 Budget indicates</p> <ol style="list-style-type: none"> 1. A \$140.4m Operating Fund which is an increase of \$0.3million over FY20 Operating funding of \$140.1million, a mere 0.2% increase which is well below inflation rates. 2. A reduced funding on new gTLD (generic Top Level Domain) by 57% from \$11.7m in FY20 to \$5.1m in FY21. This shows continuous reduction in the new gTLD expenditure and the possible conclusion of the delegation process. 3. A long term stability of the headcount at 410 though it is currently at 389. 4. A provision of \$500k per annum over the next 5years to address Universal Acceptance issues. 5. The total funds under Investment to be \$465m such that Operating Fund is \$32m, Reserve Fund - \$126m, Auction Proceeds -\$212m and new gTLD - \$95m 6. A contingency of 4% of total expenditure. <p>Based on the above, the BC appreciates ICANN Org's commitment to continuous improvement and charges that this be sustained.</p>	Thank you for your comment and feedback
Business Constituency (BC)	<p>CROP</p> <p>With respect to the need for continuous improvement, the BC wishes to propose that the Community Regional Outreach Program (CROP) be tweaked to</p>	Please see Section Functional Activities,

	allow for 50% of the beneficiaries to come from regions from outside of the ICANN Meeting Region provided that there is no beneficiaries from the ICANN Meeting Region.	subsection Policy Development and Implementation Support
Business Constituency (BC)	Singapore Cluster The BC would like to know what Singapore Cluster means with respect to the operating Initiative to continue the Root Zone Management evolution?	Please see Section operational Initiatives, subsection Root Zone Management Evolution
Business Constituency (BC)	That ICANN Org's use of the word Activities to describe its work items instead of Projects provides better understanding of its work scope and intention.	Thank you for your comment and feedback
Business Constituency (BC)	Also, it's use of the term Capacity Development throughout the document is apt and it should be sustained throughout it's activities. In this wise, the Dr Tarek Kamel Award for Capacity Building may better be christened Dr Tarek Kamel Award for Capacity Development.	Please see Section Functional Activities, subsection Policy Development and Implementation Support
Business Constituency (BC)	We believe that the term development aligns with the global Sustainable Development Goals (SDGs) Agenda and it is appropriate that ICANN's Mission be noted to take cognisance of this global initiative for the benefit of mankind. A mere note of which goal/s ICANN mission intercept/s is sufficient to address global community sensitivity to the realization of the goals. The above view becomes imperative as ICANN under the Government and Intergovernmental Organisation Engagement commits to effectively convene and facilitate discussions with relevant parties to help address relevant global challenges and opportunities for which SDGs is one. Meeting this need also justifies its budget of \$3.5m (page 274).	Please see Section Functional Activities, subsection Community Engagement & Services
Business Constituency (BC)	That ICANN in view of the growing complexities of its activities and the need to accurately use past data to advise better future performance, should invest in predictive tools viz data analytics and artificial intelligence. This would address the concern expressed under Policy Development and Advice (page 246) such that "Limited data collection to date means that data-driven policy work has been difficult and time consuming, and that decision-making is	Please see Section Functional Activities, subsection Policy Development and Implementation Support

	done without reference to specific data or other factual evidence”	
Business Constituency (BC)	That its discipline on attaining the Reserve goal of 12 months of Operating cost should be sustained.	Thank you for your comment and feedback
Business Constituency (BC)	We observed that all the Regional Offices have 0 FTE while staff are located and operational in those offices. Would it not be better to provide a note to explain this scenario and perhaps provide the percentage time estimates of the employee staff engaged in this regional office operations? (page 330)	Please see Section Functional Activities, subsection Community Engagement & Services
Business Constituency (BC)	Scope: It is BC's belief that one of ICANN Org's scope should be to optimize ICANN resources for benefits realization and not necessarily to quantify these resources. In this regard, we would like to recommend the replacement of the word “quantification” with “optimization” for the statement to read - ICANN Org strives to improve the optimization of resources	Thank you for your comment and feedback
Business Constituency (BC)	Strategic Goals...: As the phrase “global Public Interest” definition is pending what can we say that this means. it is recommended that a note be provided as a footnote on this.	Please see Section Budget Development Process & Document Contents/Structure
Business Constituency (BC)	We further recommend that the Strategic goals be revised as follows: <ul style="list-style-type: none"> • Prioritization of activities to deliver on the mission of ICANN in the global public interest and in the most cost-effective way. • Effective management and cost control using available fit-for-purpose processes and tools. • Making decisions guided by financial accountability and responsibility prior to committing ICANN's resources and managing expenses once approved in order to stay within those commitments. • Clear definition and understanding of key cost drivers. • Periodic review of risk assessments to determine the adequacy of ICANN's Reserve Fund level to address potential mitigation needs. 	Please see Section Budget Development Process & Document Contents/Structure
Business Constituency (BC)	The BC thanks the facilitator for having taken into serious consideration our comments presented in June 2 and October 3 of 2019, as well as at different webinars and similar opportunities. It is our strong belief that this project is necessary for ICANN to	Please see Section Evolve ICANN's Multistakeholder

	<p>remain relevant in the face of increasing transnational challenges, and should be assigned a high priority status moving forward, including by those parties that did not engage in this initial work.</p>	Model Work Plan
Business Constituency (BC)	<p>1) ISSUE E: Precision in scoping work Entity: GNSO Council</p> <p>The BC continues to believe that the PDP 3.0 is an important step towards the improvement of this Issue. It has been previously observed by the facilitator that these evolving approaches to scoping work should also be used outside of the GNSO PDP, and with a broader usage of these principles, so that they serve as a guideline for work performed under the ICANN umbrella.</p> <p>It is also our opinion that a key factor in improving the effectiveness of the MSM is to eliminate overlap of work by making clearer what the ongoing processes are and what their expected outcomes are. This entails, of course, that projects will be required to have better defined goals from the start and not rely on organic discovery of issues as work unfolds. More prior research needs to be performed so that discussions are carried out on top of a solid and fact-based foundation.</p> <p>We support the comment from the document that reads: “A clearly defined scope should come with parameters or guardrails such as sensible time limits, interim and final deadlines, cost and other resource constraints, and expectations for the outputs.”</p>	Please see Section Evolve ICANN’s Multistakeholder Model Work Plan
Business Constituency (BC)	<p>2) ISSUE B: Prioritization of Work + Efficient Use of Resources Entity: AC and SO Chairs (or their delegates) as the lead, working with the ICANN Org CEO and ICANN Board Chair</p> <p>ICANN org.’s notion that its priorities come “from the community” needs to be better explained and the processes that lead to the setting of said priorities should be made transparent. With the increasing volume of internal and external pressure that the community faces, it is necessary to work faster and in a more streamline manner.</p> <p>In this sense, we recall a concept pointed out in our comment regarding Issue E, which is that of making clearer what the ongoing processes are and what their expected outcomes are. Most active community members need to be up to speed with ongoing efforts</p>	Please see Section Evolve ICANN’s Multistakeholder Model Work Plan

	<p>and potential threats. This is the only way for priorities to be understood and agreed upon.</p> <p>Time at ICANN meetings should be spent moving policy forward through task-oriented sessions. An initial community briefing in which all Working Groups are allotted a short time to present their progress and current challenges could serve as an opener to the meeting so that every attendant would be on the same footing, and also remove the need for introductions to be repeated across different sessions. These summaries are delivered to some degree by ICANN staff during preparatory webinars, but staff cannot be as candid as community members, especially when there are issues with the work being carried out.</p> <p>We reinforce the BC's point replicated in the document that: "A process where the community can truly assist in setting priorities and there is an exchange between ICANN Org and involved stakeholders on the matter can be highly beneficial if properly structured."</p> <p>We support the comment from the document that reads: "ICANN Org legislative/regulatory tracker should be improved in order to help advise all involved stakeholders of external developments that could result in work creation."</p>	
<p>Business Constituency (BC)</p>	<p>3) ISSUE D: Complexity D1: The accessibility to and the ease of use of information and data Entity: ICANN Org.</p> <p>This process has made it clear that there is a consensus in the community: ICANN's website has a labyrinthine design that often results in difficulty in discovering information. Duplication of content is quite common, and there is a lack of proper hyperlinking connecting different pages and documents that are related. The wiki's organization also leaves much to be desired.</p> <p>The structure of the website needs to shifted towards a new paradigm of hubs, in which all data concerning a particular subject can be found by means of a single tag or category, instead of forcing the user to follow breadcrumbs to find different pieces of the desired information, which then require manual assembly.</p>	<p>Please see Section Evolve ICANN's Multistakeholder Model Work Plan</p>

	<p>Additionally, there is no single canonical source for updates on what the latest developments are from different projects, something that is partially covered by ICANN’s Twitter handle. Such key role should be brought to the forefront of the organisation’s main page and not performed by an account on an external platform.</p> <p>We reinforce the BC’s point replicated in the document that: “the ODP intends to generate datasets that can later be put together to make better sense of what goes on in the organization, but this does not reduce Complexity by itself, it is only a tool.”</p>	
<p>Business Constituency (BC)</p>	<p>3) ISSUE D: Complexity D2: ICANN’s bylaws, processes and procedures are complex and challenging to understand</p> <p>Entity: AC and SO Chairs as the lead, working with the ICANN Org CEO and ICANN Board Chair</p> <p>While this problem does exist, it can be alleviated significantly by incorporating changes to the website and ICANN’s data resources in general, as suggested in Issue D1.</p> <p>We reinforce the BC’s point replicated in the document that: “ICANN Org should have a sub team dedicated to more intuitively documenting the status of different groups and policy making efforts.”</p> <p>We support the comment from the document that reads: “there is a tendency to make issues appear more complicated or complex than they necessarily are. We are not good as a community at developing ‘issue or problem statements’, but we are very good at offering opinions about what we think the problem is from our respective silos.”</p> <p>We support the comment from the document that reads: “[We recommend] the creation of an independent new staff role whose sole responsibility would be to serve as an expert advisor on ICANN procedure.”</p>	<p>Please see Section Evolve ICANN’s Multistakeholder Model Work Plan</p>
<p>Business Constituency (BC)</p>	<p>4) ISSUE A: Consensus + Representation and Inclusivity Entity: GNSO as the lead, working with the other ACs and SOs</p> <p>A factor that was excluded from this process was the examination of how SO/ACs are organized and what</p>	<p>Please see Section Evolve ICANN’s Multistakeholder Model Work Plan</p>

	<p>are the consequences that come from that. We maintain the belief that the joining of the CSG and NCSG in the NCPH created challenges that are difficult to overcome without a restructuring of the system. The NCPH component groups answer to often dissimilar interests, which consequently leads to an overly broad variety of opinions.</p> <p>Too often the differences that come up put members of the NCPH at odds, rather than steer them towards the negotiation of a middle ground. This commonly makes the voting default a supermajority for the CPH, which as a group has a clear general common interest. This throws off balance in ways that are not straightforward to observe, but over time have proven to manifest in a consistent manner.</p> <p>We also acknowledge that great effort has been put into the PDP3.0 to develop consensus more effectively. However, a clear definition of what consensus means in relation to the current scale of ICANN needs to be laid out, as the community has grown to a scale that fundamentally alters the prerogatives initially set for this model.</p> <p>In relation to Working Groups (WG), it has been observed that a false sense of consensus or lack thereof can be unduly created through the use of stalling tactics and by consuming working calls with parallel or trivial debates, discouraging the participation of more goal-oriented volunteers. Leaders of WGs should have the power to make a call for consensus and act upon results, seeing as it is easy to call into question the legitimacy of a consensus but difficult to prove it, which allows for much obstructionism.</p> <p>We reinforce the BC's point replicated in the document that: "In-person attendance at ICANN meetings should be used for task-oriented workshops and ICANN should recognize that face-to-face engagement often improves the ability to reach consensus."</p>	
<p>Business Constituency (BC)</p>	<p>5) ISSUE C: Culture, Trust and Silos Entity: AC and SO Chairs as the lead, working with ICANN Org. and ICANN Board Chair</p> <p>We are unsure if handing the task over to ALAC is ideal, or to any one SO/AC, as each have their own objectives in relation to the model. All community</p>	<p>Please see Section Evolve ICANN's Multistakeholder Model Work Plan</p>

	<p>leaders need to work together with the help of ICANN org. and the Board Chair to incentivize the necessary changes, in a way that gets all stakeholders involved in the effort.</p> <p>Without understanding the focus and goals of other stakeholders, it becomes difficult to work in a harmonious way as a group. This is a systemic concern that needs to be addressed from a planning perspective, and brought back to the forefront of the community's concerns. The DNS Abuse session carried out in 2019 stands as a good example of the community coming together to present points of view and make positions clearer.</p> <p>Importantly, overall distrust and the zero-sum mentality that typify current silos are at least in part caused by the structural deficiencies and necessary changes previously identified by the BC and discussed here under Issue A. Participant silos lack the incentive to compromise on matters, when in the absence of such compromise, the status quo reigns, and each silo begins to focus more on the unfavorable proposals that they've eliminated than the actual problems they've solved. This is all the more reason that structural issues should not be disregarded and cannot be divorced from the discussion on how to improve the effectiveness of ICANN's MSM.</p> <p>We reinforce the BC's point replicated in the document that: "We do already have a tool intended for silo breaking, which is Meeting B. Meeting B is supposed to be exactly about making this sort of outreach, listening to each other, having sessions where we get to discuss."</p>	
<p>Business Constituency (BC)</p>	<p>6) ISSUE F: Roles and Responsibilities Entity: ICANN Board in coordination with the ICANN Community and the ICANN Org CEO</p> <p>Roles still seem quite unclear, even as this process draws to a close. The reason the BC considers this to be the least ripe question is that a good distribution of roles is the product of a highly structured system; which ICANN currently is not. This is an issue that can be better dealt with once others have been addressed, so that in the future these identification efforts become less necessary and work can be done in a more streamlined manner that makes sense for all of the involved community.</p>	<p>Please see Section Evolve ICANN's Multistakeholder Model Work Plan</p>

	<p>The BC does understand that the definition of roles within ICANN is supported by the Bylaws, and the clarity of those roles has increased after the IANA transition, but there are deeper considerations to be made regarding this Issue. It is unlikely that there is a good definition of roles already in place if a community-wide consultation such as this one is necessary to understand who is supposed to be handed responsibility over matters.</p>	
<p>Business Constituency (BC)</p>	<p>7) Additional issue: Recruitment and Demographics On this matter, we would like to reinforce the BC’s point replicated in the document that: ‘there should be better communication between ICANN staff, SO/ACs, leaderships and Outreach committees in each of the communities to help newcomers find their way to the groups in which they will be most effective, and when such people arrive at the group, coaching mechanisms should be in place to receive them properly.’”</p>	<p>Please see Section Evolve ICANN’s Multistakeholder Model Work Plan</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>These comments are focused on issues directly related to the role of the GNSO Council. As set forth in ICANN’s Bylaws, the GNSO “shall be responsible for developing and recommending to the Board substantive policies relating to generic top-level domains” and the GNSO Council “is responsible for managing the policy development process of the GNSO.” A significant aspect of the GNSO Council’s responsibilities is to serve as a program manager of the various policymaking and implementation projects. In this respect, expenses related to staff, travel, and resources such as software and non-ICANN employed consultants, are important data points for the GNSO Council to understand. It is also extremely important that the ICANN Finance team coordinates with the GNSO Council to be prepared for expenses related to these projects. Likewise, in order for the GNSO Council to appropriately prioritize and schedule its work, and the work of the community in policy development processes (PDPs) and implementation and review teams (IRTs), ICANN should start to measure the time and value of the volunteer time and resources dedicated to ICANN.</p>	<p>Please see Section Financial Management, subsection Expense Details</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>Although we have budget experts drawn from the various GNSO constituencies as part of the SCBO, we find it is difficult (as noted in prior comment submissions) to approximate the levels of financial support provided directly and indirectly to the various Supporting Organizations, Advisory Groups, and associated Stakeholder Groups and Constituencies.</p>	<p>Please see Section Financial Management, subsection Expense Details</p>

	This information is essential for each of these groups, including the GNSO Council to hold ourselves, and others, mutually accountable.	
Generic Names Supporting Organization Council (GNSO)	The funding for the Operating Initiatives is forecasted to take about 5% of ICANN’s funding by FY25. While it is comparatively small to what is spent on personnel (more than 55%.) it nevertheless represents several millions of dollars. In that sense, it matters to the GNSO Council that the cost of those Operating Initiatives be reasonably justified. However, the explanations for the numbers put forward often lack in detail. They may represent a good or fair estimate of the actual cost, but it also matters that the community be able to evaluate whether such an amount represents a proper use of ICANN’s resources. For example, reporting that an unidentified part of the \$4 to \$5 million dollars planned for evolving and strengthening the multistakeholder model will be spent on “consultant costs” and “implementation relating to the recommendations and outcomes,” the GNSO Council is not able to evaluate whether this is a good use of ICANN’s resources. Overall, we are less concerned with the precise accuracy of the numbers, and more with their justification.	Please see Section Financial Management, subsection operational Initiative Forecasting
Generic Names Supporting Organization Council (GNSO)	We are satisfied that ICANN is planning on keeping a stable headcount throughout the FY21-25 period, given the uncertainties as to its revenue and the domain name industry in general.	Thank you for your comment and feedback
Generic Names Supporting Organization Council (GNSO)	The GNSO Council appreciated that the FY21 Budget and 5YS&OP referencing certain enumerated Operating Initiatives and Functional Activities. This concept was very useful in examining portions of these documents relevant to the GNSO’s work. With respect to the 5YS&OP, the low, mid and high range estimates were useful to gauge overall expenses over the next 5 years; however, we were not able to compare these figures to past cycles to discern trends and the details concerning the figures that made up such estimates were not made available. Probably, the most valuable information provided was the number of full-time equivalents (FTE), personnel expenses, and non-personnel expenses for Functional Activities in the 5YS&OP. However, again this information did not allow insight into their components or comparisons to prior years.	Please see Section Budget Development Process & Document Contents/Structure
Generic Names Supporting Organization Council (GNSO)	With respect to the FY21 Budget, it was useful that the document contained information to allow the GNSO Council to compare FY20 expenses to FY21 expenses. However, the data is provided at a very high-level (personnel, professional services and	Please see Section Financial Management, subsection

	<p>contingency). The GNSO Council requests data (possibly via a hyperlink in the document) that would allow it to better understand the figures underlying these numbers. The GNSO Council would appreciate insight into what line items make up these figures and the ability to compare them to previous years. For instance, the GNSO Council was unable to determine whether its yearly Strategic Planning Session was now part of the FY21 Budget.</p>	Expense Details
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>The GNSO Council is committed to improving the multistakeholder model policy development process in a manner that ensures diverse and inclusive participation in policymaking. As identified in the GNSO Policy Development Process 3.0 Final Report, long-life cycle large working groups are taxing working group members and communications amongst a diverse global group has its inherent problems. As such, The GNSO Council applauds the targeted outcome of establishing “mechanisms, such as an accurate measure of community participation, to equitably distribute workload among the pool of stakeholder representatives.” It is critical that the Community and ICANN Org has a better understanding of the work, hours and value of the Community members’ participation. In terms of resources, the GNSO Council supports ICANN Org’s Policy Development Support team collaborating with the ICANN Board and Community on prioritization and planning for anticipated future work. Strategic priority should be given to accomplishing this much needed coordination.</p> <p>The GNSO Council notes that the 5YS&OP makes no mention of efforts to develop solutions to “culture, trust and silo” issues. As noted in Evolving ICANN’s Multistakeholder Model Work Plan in Appendix C, we can assume that resources needed to address this issue also include volunteer time, ICANN Org staff time and support and budget for meeting space and logistics. In its strategic planning, the GNSO Council acknowledged the usefulness of dedicated face-to-face meetings for certain policy efforts. Although the expense of such meetings is more immediately felt, ICANN should examine whether long range cost savings can be achieved through greater efficiencies and shorter PDP periods from such face-to-face meetings.</p> <p>Finally, the GNSO Council encourages ICANN to maintain adequate staffing for Policy Development</p>	<p>Please see Section operational Initiatives</p>

	Support which is indicated to require at least 35 FTEs.	
Generic Names Supporting Organization Council (GNSO)	<p>The GNSO Council also fully supports the goal of ensuring efficient and effective participation in the policy development work of ICANN. In particular, we were pleased to see reference to improvements to the multistakeholder model processes through efforts such as Policy Development Process (PDP) 3.0. For Instance, one objective of the PDP 3.0 Final Report was to “empower WG Chairs with additional tools and support to ensure effective and efficient leadership”. Although one targeted outcome tracks this objective, it would be useful to provide greater specificity that these tools include, but are not limited to, additional staff resources, software tools, advice from legal/consultants, independent facilitators and data or research. For instance, independent facilitators successfully helped consensus-building during EPDP on the Temporary Specification for gTLD Registration Data face-to-face meetings and supported this EPDP’s leadership. With respect to software tools, the GNSO Council believes that a cloud-based project management tool that can be integrated with existing ICANN systems, such as CRM software connected to dashboard(s) to visualize workload and metrics to assist with prioritization, is an essential tool to keep track of its complex and numerous workstreams. With respect to personnel, the GNSO Council recommends an FTE program manager and project manager to support PDP management (including WG chairs and policy staff), and the GNSO Council.</p> <p>In addition, a strategic goal that should impact resources related to this Operating Initiative is developing tools and processes to build compromise by creating incentives to compromise. Although outside the scope of this comment, the GNSO Council is evaluating specific requests relating to such tools. For instance, there has been discussion about developing a conflict-free bench of trained and skilled PDP chairs, as well as, training materials and modules on chairing skills, conflict resolution, time management, and resources/guidelines for best practices.</p>	Please see Section operational Initiatives, subsection Evolve and Strengthen the ICANN Community's Decision-making Processes to Ensure Efficient and Effective Policy-making
Generic Names Supporting Organization Council (GNSO)	The GNSO Council understands that ICANN org strives to improve the quantification of resources, evaluation of needs, prioritization, flexibility, and transparency of the management of ICANN’s resources and activities. As an initial matter, the	Please see Section operational Initiatives,

	<p>GNSO Council notes that the 5YS&OP indicates that "resources for this initiative are included within the functional activities of the financial plan core budget and therefore no incremental resources are needed." However, given the importance that the ICANN Board has placed upon the current draft proposal on Resourcing and Prioritization of Community Recommendations, in which the Board suggests an effectiveness framework that includes ideas to facilitate resourcing and prioritization of recommendations in the future, and the five year roadmap, the GNSO Council suggests that ICANN should set aside a substantial line item budget for planning and project management oversight.</p> <p>Noting that this is the second iteration of a 5-year strategic plan at ICANN, it may be appropriate for an initial section to be provided to outline Key Lessons Learned from the last 5-Year Operating Plan and Budget. Such a Lessons Learned section could include the extent to which objectives were met and how certain risks were mitigated. This section could also reflect how financial projections have performed among other outcomes.</p>	<p>subsection Planning at ICANN</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>The GNSO Council recognizes that ICANN Org has limited budget and resources. Therefore, other Operating Initiatives are competing with scarce resource allocation. To this point, while supporting the development of an internal and external ethics program, the expense and duration of this initiative appears to be extensive. Additional details and the line item estimates of expenses would be appreciated.</p>	<p>Please see Section operational Initiatives</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>As an initial matter, with respect to Policy Development and the total budget for FY 21 is the same as for FY20, \$6.9M and 35 FTE. There is a difference in the allocation, Personnel increased in \$0.3M and Non Personnel decreased in the same amount. We suppose this is due to an increase in the cost of Personnel, but that should have been considered with an increase of the whole budget.</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>The GNSO Council asserts that the Name Collision Analysis Project should not be included in this section of the FY21 budget as it is not a Policy issue.</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>

<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>The GNSO Council asserts that it is important the initiatives, tools and resources associated with PDP 3.0 should be explicitly individualized in the activities, and not just mentioned as an example. This would enable the GNSO Council to adequately evaluate whether the recommended changes associated with PDP 3.0 are being adequately funded. With the current budget, the GNSO Council can only discern that 35 FTEs will be devoted to Policy Development Support and that Non-Personnel expenses have been allocated \$1.7 million.</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>The GNSO applauds the Board’s commitment to not only provide support to implementation of consensus policy recommendations, but also highlighting policy research as a separate and necessary function. The GNSO also supports that the budget includes milestones which are set forth to track the progress and that the timing of these milestones depends on identified factors such as community comment and Board consideration. That being said, the GNSO would like to see a greater emphasis and detail in the budget as to the impact of milestones not being met and a description of contingencies if milestones are not met. Moreover, the GNSO Council questions whether 4 FTE and \$500,000 is sufficient allocation of funds to support data, research, and study project requests for implementation work for the Competition, Consumer Trust, and Consumer Choice Review Team (CCT-RT) recommendations on data collection, Phases 1 and 2 of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process Team (EPDP), and the anticipated policy recommendations from the New gTLD Subsequent Procedures PDP.</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>The GNSO Council observes that the numbers of allocated travel seats have slightly increased since FY20, as most SOs and ACs have obtained one or two more travel slots per meeting.</p> <p>As the numbers given for FY21 are described as being the same as FY20, the GNSO Council would like to inquire on the rationale behind the increase and whether they were done according to some criteria. For example, the GAC remained at 40 seats; the Fellowship and NextGen programs remained at 45 and 15 seats respectively; the GNSO obtained one more seat, from 48 to 49 funded travelers, a 2% increase; the RSSAC obtained 2 more seats, from 4 to 6, a 50% increase.</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>

<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>In reviewing this section of the FY21 Budget, the GNSO Council notes that it needs to better understand the criteria by which some events are listed under this functional activity, while others or not. The GNSO Council suggests that criteria are explained or that that all events be listed. This is a critical component to transparency.</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>In addition, similarly to our other comments on the numbers presented in the 5YS&OP, we highlight the fact that the Constituency Travel section of the FY21 presents the figure of \$2.4M dedicated to constituency travel, without relating that figure to anything presented in the budget. Conversely, the budget presents two figures, that of \$2.2M and \$2.7M, the latter inclusive of certain one-off items, without relating those to what is found in the Operating Plan.</p>	<p>Please see Section Functional Activities, subsection Policy Development and Implementation Support</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>The RySG appreciates ICANN’s comprehensive documentation, continued fiscal vigilance and efforts to thoroughly plan and track expenditures. That said, the document has now become massive and challenging to deal with from a volunteer perspective and, in any event, the prioritisation of the various initiatives is not clear. Having a Highlights document alongside the primary document is helpful in this regard, but the point on relative importance or prioritisation remains. Visible prioritisation combined with progress tracking tools will be a welcome addition.</p>	<p>Please see Section Budget Development Process & Document Contents/Structure</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>Given the size and comprehensive nature of the document, it is surprising that ICANN Org makes no apparent reference or commitment to its environmental or carbon footprint. ICANN is a global organisation that should reasonably be expected to be both committed to monitoring the impact of its policies and operations on the broader environment and to reducing its impact on the consumption of natural resources. The introduction of such measurement by ICANN and a commitment to improvement are necessary additions.</p>	<p>Please see Section Functional Activities, subsection Community Engagement & Services</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>ICANN Org’s recognition that the requirement for “Resourcing and Prioritization of Community Recommendations” is a fundamental requirement of effective planning is welcome. The repeated mantra that the vast majority of the work and therefore expenditures is repeated annually is less welcome. No organisation’s thinking on its financials or any other areas of operation should be so constrained as to be simply repeated year after year. ICANN Org</p>	<p>Please see Section Financial Management, subsection Expense Details</p>

	<p>should be always willing to challenge underlying assumptions about operating expenditure and the need (or not) to repeat any element of this from year to year. The RySG encourages ICANN Org to continually challenge its own assumptions about such expenditure</p>	
gTLD Registries Stakeholder Group (RySG)	<p>Constraining the growth in staff numbers is welcome and this is clearly reflected in the average headcount remaining approximately constant throughout the five-year term of the plan. However, no clear rationale is provided for why approximately 400 staff is the correct number and whether or not further operational efficiencies can be achieved. Moreover, a key driver for past headcount growth was the requirement to implement the 2012 new gTLD programme on top of an existing operational capability. Implementation of that 2012 programme has now given way to steady-state operations at the significantly increased headcount level. Future rounds of new gTLDs are very likely to be introduced over the course of the five-year plan and ICANN Org needs to demonstrate how it will continue to manage its operations so as to not create a further upward increment in steady-state costs, including staffing, associated with any new TLD rounds.</p> <p>Notwithstanding the above, it is self-evident that ICANN's funding is primarily generated by the effective operation of gTLD registries and registrars and it is therefore incumbent on ICANN Org to ensure that such operations are fully and effectively supported by comprehensive funding of ICANN Org's Generic Domains Division and GNSO policy functions.</p>	<p>Please see section Functional Activities, subsection Policy Development and Implementation Support</p>
gTLD Registries Stakeholder Group (RySG)	<p>The ongoing focus on an annual contribution to the Reserve Fund from surplus operating funds is welcome. To the extent that the Board has taken the decision that a certain level of reserve funding is necessary to ensure organisational security and stability, it is incumbent on ICANN Org to plan for this via annual contributions to the ICANN Reserve Fund. The RySG supports this ongoing activity.</p>	<p>Please see Section Financial Management, subsection Reserve Fund</p>
gTLD Registries Stakeholder Group (RySG)	<p>The provision for an approximately US\$5m contingency seems pragmatic but care needs to be taken to ensure that unplanned expenses are effectively controlled so as to remain within the contingency.</p>	<p>Please see Section Financial Management</p>
gTLD Registries Stakeholder Group (RySG)	<p>A couple of points of clarification seem warranted with respect to the initiative to 'Develop Internal and</p>	<p>Please see Section</p>

	<p>External Ethics Policies.’ (Introduced at pages 31-32, see also 199-200.)</p> <ul style="list-style-type: none"> • First, is it expected that the Board will be specifically covered by one of these policies? • Second, is there an expectation that this will be completed early in the five-year cycle or is it envisioned that these policies can be developed at any point along the five-year period? 	operational Initiatives
gTLD Registries Stakeholder Group (RySG)	<p>RySG members have a strong interest in the ongoing strength of the Root Server System (RSS), and have previously expressed our support for the plan to Evolve the Governance of the RSS, which ICANN mentions as part of this strategic initiative.</p> <p>However, we note that the majority of the goals and targeted outcomes that ICANN enumerates only involve interaction with root server operators, but not customers of the RSS. We believe the community, including the customers of the RSS, should continue to drive the definition and setting of requirements, as well as future solutions.</p>	Please see Section operational Initiatives, subsection Support the Evolution of the Root Server System
gTLD Registries Stakeholder Group (RySG)	<p>The RySG urges ICANN to provide additional information about the pros and cons of the hyperlocal root configuration in recursive resolvers that it will be encouraging.</p>	Please see Section operational Initiatives, subsection Support the Evolution of the Root Server System
gTLD Registries Stakeholder Group (RySG)	<p>The RySG would also appreciate additional clarity about how the activities of the root server operators will be funded.</p>	Please see Section operational Initiatives, subsection Support the Evolution of the Root Server System
gTLD Registries Stakeholder Group (RySG)	<p>While the RySG supports this initiative in principle, it raises a number of questions. In particular, we would like ICANN to provide additional information around the purview and intended working methods of the “DNS Security Facilitation Center,” which is introduced in this Plan but not defined or described with any detail. For example: What does ICANN see as its future role in DNS emergency readiness?</p>	Please see Section operational Initiatives

gTLD Registries Stakeholder Group (RySG)	We would also like additional information and engagement with ICANN Org about the kind of research ICANN intends to undertake regarding the use of artificial intelligence to understand abuse trends in domain registration.	Please see Section operational Initiatives
gTLD Registries Stakeholder Group (RySG)	We would also like to know what goal ICANN is trying to achieve by increasing the availability of root zone data.	Please see Section operational Initiatives
gTLD Registries Stakeholder Group (RySG)	<p>This is a critical issue for ICANN as it is a fundamental aspect of the bottom-up, multistakeholder model of policy making and Internet governance.</p> <p>While we respect the need for inclusiveness and the requirement to ensure that a diversity of perspectives and viewpoints is accounted for in ICANN's work, we note that the sheer number of participants in policymaking is not a measure of success in and of itself. Participants in the policymaking process should be evaluated on their skills and commitment, and it should be the active participation of skilled participants that is taken as a sign of success.</p>	Please see Section operational Initiatives
gTLD Registries Stakeholder Group (RySG)	ICANN's multistakeholder model will be further strengthened by increased transparency into the activities undertaken by ICANN Org and the CEO, including interactions with governments or regulators.	Thank you for your comment and feedback
gTLD Registries Stakeholder Group (RySG)	<p>Similar to Initiative 3, this is another critical issue for the viability of ICANN's multistakeholder model.</p> <ul style="list-style-type: none"> ● A critical aspect of facilitating effective decision-making in the policy process is properly scoping work efforts to include specific objectives with precise and manageable tasks. ● ICANN should consider providing increased training and support for chairs and leaders of ICANN work efforts (including Reviews, PDPs, CCWGs, etc.). Strong staff support that provides resources for Chairs to be able to accurately summarize discussions and drive toward decisions is also critical. To that end, project management systems or software may be necessary. ● Board Liaisons can also be effective in supporting decision-making by helping to resolve impasses, and this role should be utilized more in the future. 	Please see Section operational Initiatives, subsection Evolve and Strengthen the ICANN Community's Decision-making Processes to Ensure Efficient and Effective Policy-making
gTLD Registries Stakeholder Group (RySG)	The RySG is curious to know whether ICANN intends for this initiative to take the full five years that the Strategic Plan covers, or whether it can establish these policies more quickly.	Please see Section operational Initiatives

gTLD Registries Stakeholder Group (RySG)	The RySG would also like to know whether such policies would also apply to Board members.	Please see Section operational Initiatives
gTLD Registries Stakeholder Group (RySG)	As ICANN is examining competition within the Domain Name System, it is imperative to examine other markets within the industry in order to fully understand the competitive landscape, and eventually promote and sustain competition.	Please see Section operational Initiatives, subsection Promote and Sustain a Competitive Environment in the Domain Name System
gTLD Registries Stakeholder Group (RySG)	As ICANN is considering user management improvements to allow more parties to be authorized as TLD managers, we urge ICANN to proceed with caution and put parameters in place that will prevent wide-scale DNS changes that may pose stability risks to the root.	Please see Section operational Initiatives, subsection Root Zone Management Evolution
gTLD Registries Stakeholder Group (RySG)	Staff retention is an absolute necessity for the success of PTI / IANA functions.	Please see Section Functional Activities, subsection IANA Functions
gTLD Registries Stakeholder Group (RySG)	As it interacts with governments and intergovernmental organizations, it is important that ICANN not have a specific policy agenda. Instead, it should develop processes for the community to reach agreement on prioritization, targets, and any positions ICANN might take.	Please see Section operational Initiatives
gTLD Registries Stakeholder Group (RySG)	As stated above, ICANN must provide full transparency when it engages with governments, regulators, or other such parties.	Please see Section operational Initiatives
gTLD Registries Stakeholder Group (RySG)	The RySG believes that an effective GAC is a crucial part of an effective multistakeholder model for ICANN. While we believe ICANN should engage with the GAC members, it will also be important for the GAC members to improve their engagement with their home governments to keep them apprised of timely and relevant issues.	Please see Section operational Initiatives, subsection Through Targeted Engagement

		Improve Governments and Intergovernmental Organizations (IGO's) Engagement and Participation in ICANN
gTLD Registries Stakeholder Group (RySG)	Monitoring is useful to understand what is coming, but the type and level of engagement must be determined based on topical guidance from the community, as stated above.	Please see Section operational Initiatives, subsection Monitor Legislations, Regulations, Norms, Principles, and Initiatives in Collaboration With Others that May Impact the ICANN Mission
gTLD Registries Stakeholder Group (RySG)	The RySG supports improved planning around ICANN's budget and funding model.	Please see Section operational Initiatives
gTLD Registries Stakeholder Group (RySG)	The draft budget indicates that ICANN Org is 2 years ahead of the approved schedule for reserve fund replenishment. The RySG suggests to consider staying on schedule via an annual contribution to the Reserve Fund from surplus operating funds to ensure funds are available now for unplanned expenditures.	Please see Section operational Initiatives
gTLD Registries Stakeholder Group (RySG)	The RySG suggests to consider putting a process in place for going forward with the creation of contingency funds. A contingency fund could remove the necessity to draw from reserve funds if there is an allocation for unpredictable but necessary broadening of scope. Care must be taken to ensure that unplanned expenses are effectively controlled to remain within the contingency.	Please see Section operational Initiatives
gTLD Registries Stakeholder Group (RySG)	The Registries Stakeholder Group (RySG) appreciates the opportunity to provide feedback on the Evolving ICANN's Multistakeholder Model (MSM) Work Plan. The RySG understands the importance of maintaining and improving the efficiency and effectiveness of the MSM and the lasting effects it will have on ensuring ICANN's long-term viability. As	Please see Section Evolve ICANN's Multistakeholder Model Work Plan

	<p>such, we have been actively involved in providing input and feedback into earlier stages of the Evolving ICANN's MSM initiative.</p> <p>We are cognizant of the fact that developing this Work Plan involved multiple, lengthy consultations with community members and we appreciate the work that went into gathering this information. However, given the time and resources that went into earlier stages of this initiative, the RySG is somewhat disappointed in this Work Plan as a final product. It is extremely light on substance and offers little guidance beyond suggesting which community group should take lead on developing solutions - which is sometimes even so broad as to be entire SOs or ACs</p> <p>Fortunately, upon reviewing the Work Plan, the RySG observes that most of the issues are currently being addressed via other community efforts, most notably the GNSO's PDP 3.0 and the Third Accountability and Transparency Review (ATRT3). As such, we suggest that these efforts be allowed to run their proper course before the ICANN community takes on the additional work that will be required to fulfill this Work Plan. The community is already burdened with a great deal of work at present, and so realizing efficiencies where existing efforts can address the issues outlined here is the prudent approach. We suggest that this Work Plan be revisited once those efforts are complete.</p>	
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>As the Work Plan document notes, the GNSO's PDP 3.0 effort has considered and offers some improvements to address this issue. The RySG supports the analysis of ISSUE A in the Work Plan and agrees that the GNSO Council is well situated to take the lead and build on the work it has done in PDP 3.0, and encourage other ACs and SOs to adopt and adapt those solutions.</p> <p>Addressing the other issues identified in the Work Plan, such as increasing trust, a better prioritization and scoping of work, would contribute and have a positive effect on the consensus building within the ICANN community.</p>	<p>Please see Section Evolve ICANN's Multistakeholder Model Work Plan</p>

<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>As general principle for all future work the RySG supports the suggested approach in the Work Plan. We note that the topic of prioritization was also raised in the ATRT3 Draft Report, and we reiterate herein many of the comments we made in response to the Review Team’s draft recommendation regarding prioritization</p> <p>The prioritization of work should be community-led: in the hands of the SO and AC Leaders, based on bottom-up input from their respective communities and in dialogue with the ICANN Org CEO and ICANN Board Chair to assure that staff and budget constraints are fully taken into account.</p> <p>As mentioned earlier, the RySG sees value in a more natural and streamlined prioritization process in which ongoing work is designed as a spiral, with small concrete projects (better scoped, budgeted and managed) that people can participate in as time allows but that overlap to avoid decisions being made in a vacuum. Such an approach would be easier to manage by SO/AC Leaders.</p> <p>We fear, however, that expecting SO/AC Chairs to establish a fully detailed overview of all ongoing work in the community and adequately prioritize in the shortest possible time is too complex and demanding next to their other responsibilities. The RySG therefore sees value in establishing an ad hoc alumni group of former leaders who could come together to work on prioritization of all already ongoing work, in support of the SO/AC leaders. This “Alumni Leadership Group” could include former leaders of ICANN Supporting Organizations, Constituencies, Stakeholder Groups, Advisory Committees and policy development process (PDP) working groups. This group’s mandate should be limited in time and focus on the mapping and prioritizing of already started work and not become a permanent standing-type committee (like the one suggested in the ATRT3 recommendations, which in our opinion, would make planning and prioritization more complex and slow it down). The Alumni Leadership Group could develop recommendations and best practices for scoping future work efforts</p>	<p>Please see Section Evolve ICANN’s Multistakeholder Model Work Plan</p>
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<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>The RySG is of the opinion that breaking down cultural and attitude barriers that prevent collaboration and the ability to compromise in order to reach decisions and produce outputs has the most chance of success when done on a case-by-case basis at the level where community members work together to address a specific issues. This requires strong leaders who are skilled in fostering compromise and consensus. ICANN Org should provide additional resources, such as training or professional mediators. It also requires that participants in major work processes such as PDPs have the authority, incentive and the willingness to compromise. SO and AC leaders bear the responsibility of selecting the best people to cooperate on solutions across communities.</p> <p>Initiatives could be taken at community level, lead by ALAC and the different SOs and ACs to foster a cultural shift to mitigate the fear of the “slippery slope” - members of the community routinely believe that if one compromises on one item, one will be forced to compromise on other items - and to tackle the vision that staying in a silo and not working to compromise on a solution is the safest position for those in favor of a status quo (for whatever reason). However, we are skeptical about their effectiveness in the short term.</p> <p>Changing and streamlining the work processes, with smaller projects that are consecutive but overlapping (see our suggestions for ISSUE B), might have a positive influence on the cooperation and trust among different communities, make it easier to compromise and incrementally move forward.</p>	<p>Please see Section Evolve ICANN’s Multistakeholder Model Work Plan</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>Changing and streamlining the work processes, with smaller projects that are consecutive but overlapping (see our suggestions for ISSUE B), might have a positive influence on the cooperation and trust among different communities, make it easier to compromise and incrementally move forward.</p>	<p>Please see Section Evolve ICANN’s Multistakeholder Model Work Plan</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>As the RySG has stated in earlier comments on the Evolving ICANN’s MSM initiative, complexity should not be seen as an issue that needs to be resolved, but rather a challenge to which the ICANN community needs to rise. We can support the analysis under ISSUE D. Complexity, in the Work Plan, and the suggested approach as it contributes to better equipping ICANN community members to take on the complexity.</p>	<p>Please see Section Evolve ICANN’s Multistakeholder Model Work Plan</p>

	<p>We'd also like to refer to our feedback on ISSUE B on Prioritization and ISSUE E on Precision in scoping, as a better, more streamlined work process with smaller, clearly scoped projects, will have a positive effect on the complexity of the MSM work.</p> <p>We want to stress that the analysis that the complexity of the bylaws, processes and procedures are due to excessive use of acronyms and technical and other jargon, is not a request to open up bylaws, processes and procedures. This is either being done elsewhere (for example PDP 3.0) or not an issue at the moment.</p>	
gTLD Registries Stakeholder Group (RySG)	<p>The Work Plan does not suggest which community entity would be best equipped to tackle ISSUE E, which is somewhat concerning given the overall lack of detailed guidance contained in the plan. We have commented previously that precision in scoping work is something that often must be ensured on an individual basis - each work effort that is initiated should be scoped in a way that makes the work achievable on a reasonable timeline. While this work will generally fall to whatever group charters or initiates each work effort, we suggest that the Alumni Leadership Group described above and in our earlier comments could be helpful in developing recommendations or best practices for scoping work efforts, which can then be promulgated throughout other parts of the community. The Alumni Leadership Group's recommendations could be based on lessons learned from SSAC's practice for precision focus and the PDP3.0 initiative already acknowledged in the Evolving ICANN's MSM Work Plan, as well as best practices in other parts of the community and beyond.</p>	Please see Section Evolve ICANN's Multistakeholder Model Work Plan
gTLD Registries Stakeholder Group (RySG)	<p>As the RySG noted in its previous comments on the Evolving ICANN's MSM initiative, we do not believe this issue is a standalone challenge to the effectiveness and efficiency of the MSM in its own right, but rather an issue that contributes to other, more insidious issues like Precision in Scoping the Work. We do not believe that the Work Plan needs to address the topic of Roles & Responsibilities separately, but rather that each solution that ultimately gets developed should include clearly delineated assignments of responsibilities to specific parties.</p>	Please see Section Evolve ICANN's Multistakeholder Model Work Plan
gTLD Registries Stakeholder Group (RySG)	<p>How should the six issues included in the work plan be prioritized?</p> <p>High Priority issues:</p>	Please see Section Evolve ICANN's

	<p>ISSUE B. Prioritization of Work + Effective Use of Resources ISSUE E. Precision in scoping work</p> <p>Lower Priority issues: ISSUE A. Consensus + Representation and Inclusivity ISSUE C. Culture, Trust and Silos ISSUE D. Complexity</p> <p>The RySG considers the following issues not a priority that need to be addressed in order to improve the effectiveness of the ICANN MSM: ISSUE F. Roles and Responsibilities</p>	<p>Multistakeholder Model Work Plan</p>
<p>Governmental Advisory Committee (GAC)</p>	<p>FY21 and Future Budget Considerations - For the latest FY21 year planning effort, the GAC has, again, made use of the ICANN community Additional Budget Request (ABR) process to seek support for a total of four (4) workshop events in FY21 - including in conjunction with the ICANN 71 and 72 public meetings.</p> <p>On an annual basis, the GAC's interest in resources for supporting the workshop program now faces a substantial number of competing community requests. For example, for FY21, the GAC workshop proposal for ABR resources faces competition with 32 other separate requests from ICANN supporting organizations, advisory committees, stakeholder groups and constituencies. That competition should not be necessary for an established and successful core advisory committee program. See - https://community.icann.org/pages/viewpage.action?pageId=44958870</p> <p>Given that competition, the GAC is not optimistic that its ABR request for FY21 will be fully approved. In order to avoid a scenario where the GAC receives only partial or no funding at all of its latest ABR proposal, the committee asks that the ICANN budget reflect an annual \$50,000 commitment to the workshop program in FY21 and for future years. Such a commitment would enable the GAC to focus on long term strategic plans for the workshop program. Moreover, it would reduce potential annual competition with requests from other ICANN communities.</p> <p>Face-to-face capacity-development workshops allow for more sustained and informed participation by GAC</p>	<p>Please see Section Financial Management, subsection Additional Budget Requests</p>

	<p>members within ICANN activities as well as provide opportunities for local (or regional) high-level decision-makers who are not regular GAC representatives, to attend and enhance their appreciation and resource support for GAC/ICANN activities.</p> <p>The GAC is grateful to ICANN for this opportunity to share the committee’s perspective on the Draft FY21-25 Operating & Financial Plan and Draft FY21 Operating Plan & Budget and looks forward to having its capacity building workshop program become a core part of the annual ICANN commitment of resources to the community. The GAC looks forward to contributing to future comment opportunities as they relate to ICANN’s finances and other operations-related proceedings.</p>	
i2Coalition	<p>ICANN is not an ordinary Non-Government Organization. ICANN plays a critical role in ensuring the security, stability, and resiliency of the IANA functions, and in particular, the DNS root zone. Appreciating this critical role is key to understanding the difference between ICANN and other organizations. The global economy has flourished due to the effective and centralized management of the DNS root zone. Due to the global economic importance of the DNS, ICANN needs to live within its current budget, and be conservative about how it operates under existing revenue streams. The ICANN organization should carefully balance its budgetary increases with the need to continue to properly and adequately allocate money for its core functions, and ensure that no monies spent are done so for activities that stray from the Mission of the organization. The FY21 Operating Plan does a good job at articulating the connection between how ICANN Org intends to fulfill its stated Mission and the financial costs associated with them, including metrics and risks.</p> <p>In general, i2Coalition believes that the ICANN budget as presented is relatively fiscally conservative in appropriate ways. We offer up specific areas in which we take exception.</p>	Thank you for your comment and feedback
i2Coalition	<p>Headcount: ICANN headcount is still growing for the year. We see a small increase and continue to advocate for not just a freeze, but in fact, a potential decrease. We continue to stress that an assessment is required to determine whether each role at ICANN is essential in maintaining ICANN’s Mission, and whether each role has metrics for success associated</p>	Please see section Functional Activities, subsection ICANN org Headcount

	with it. If justification cannot be made for any role, a role should be cut and the overall headcount decreased. While it may be due to the fact that the bulk of the hiring is to be done in FY21, we are pleased with the perspective that headcount will remain stable as predicted in the 5 Year Plan.	
i2Coalition	Growth expectations: ICANN continues to base its budget off of an assumption that legacy TLD growth numbers (4.1% growth) will persist. Published industry-wide reports from Verisign and others show these numbers to be unrealistic. Domain growth is relatively flat. ICANN needs to work within a budget that reflects that. While ICANN's Budget puts the risk of lower TLD numbers at "Low", it is important that the organization operate closer to fiscal reality.	Please see Section Funding, subsection Forecasting
i2Coalition	Participation and travel: Active participation requirements need to be put in place for travel funding across the board. We continue to note the need for a comprehensive model on this, that encourages working group participation and doesn't merely consider attendance at ICANN meetings a sufficient metric for success.	Please see Section Functional Activities, subsection Policy Development and Implementation Support
i2Coalition	GDPR as a ongoing concern: The language used for the data privacy heading is strikingly similar to previous Budgets, which argue that the previous year was when GDPR-related work would conclude. While the contingency section talks about GDPR, we ask that the funding for further GDPR-related concerns be added as part of the budget, as doing otherwise does not seem realistic, given the complexity of the issues we are grappling with.	Please see Section Financial Management, subsection General Data Protection Regulation
i2Coalition	We appreciate the work ICANN Org. has put into creating the 5 year plan, in particular with an eye towards realistic expectations, as well as worst case and best case scenarios, in terms of financial needs. While the 15 initiatives lay out a strong sense of what ICANN is and what it should do going forward, we also appreciate the work that has been put into understanding the risks and considerations for each of the initiatives, and how they may be very impactful in actually succeeding on the implementation side. In particular we appreciate the community-focused initiatives such as "Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking" and "Evolve and Strengthen the ICANN Community's Decision-making Processes to Ensure Efficient and Effective Policymaking" which by their nature would fundamentally bring about more transparency to the	Thank you for your comment and feedback

	<p>multistakeholder model and general decision-making process. We welcome the implementation of “Evaluate, Align, and Facilitate Improved Engagement in the Internet Ecosystem”, which would streamline ICANN’s involvement in policy discussions, and does not require additional funding beyond FY21.</p>	
i2Coalition	<p>For Financial Projections, we appreciate both the capping of staffing at 410 across the 5 years beyond FY21, and the thought that went into identifying actions that ICANN Org can, and should, take in the event of underfunding.</p>	<p>Thank you for your comment and feedback</p>
Non-Commercial Stakeholders Group (NCSG)	<p>We are overall satisfied that ICANN is currently contemplating a stable headcount and operating expenditures for FY21 to FY25. This is especially important given its own revenues forecast for the period, which displays a non-negligible risk of slight decrease.</p>	<p>Thank you for your comment and feedback</p>
Non-Commercial Stakeholders Group (NCSG)	<p>We are also satisfied that the NCSG will be participating in the NCPH intersessional during ICANN68 in Kuala Lumpur, Malaysia.</p>	<p>Thank you for your feedback. ICANN org is also pleased that the NCSG will be participating in the NCPH Intersessional.</p>
Non-Commercial Stakeholders Group (NCSG)	<p>The funding for the Operating Initiatives is forecasted to take about 5% of ICANN’s funding by FY25. While it is comparatively small to what is spent on personnel (which takes more than 55% of the yearly revenues,) it nevertheless represents several millions of dollars. In that sense, it matters to the NCSG that the cost of those Operating Initiatives be reasonably justified.</p>	<p>Thank you for your comment and feedback</p>
Non-Commercial Stakeholders Group (NCSG)	<p>However the explanations provided for each operating initiative often lack in detail. They may represent a good or fair estimate of the actual cost, but it also matters that the community be able to evaluate whether such an amount represents a proper use of ICANN’s resources. For example, reporting that an unidentified part of the \$4 to \$5 million dollars planned for “evolving and strengthening the multistakeholder model” will be spent on “consultant costs” and “implementation relating to the recommendations and outcomes,” the NCSG is not put in a position to evaluate whether this is a good use of ICANN’s resources. Overall, we are less concerned with the precision and accuracy of the numbers, and more with their justification.</p>	<p>Please see Section operational Initiatives</p>

<p>Non-Commercial Stakeholders Group (NCSG)</p>	<p>Moreover, we are wary of processes that involve external consultants, especially when it comes to matters affecting core Community activities. There have been several instances in the past where recourse to external consultants to “solve problems” did not prove overall beneficial, for a variety of reasons, one of which is the lack of Community involvement in the consultants’ work. While NCSG is cautious regarding the initiative and the efforts to examine and strengthen ICANN’s multistakeholder model, it is vital that the whole Community be included in the process from start to finish.</p>	<p>Please see Section operational Initiatives</p>
<p>Non-Commercial Stakeholders Group (NCSG)</p>	<p>Finally, we would also note that it appears ICANN does not know where the domain name industry is headed, as its forecast bracket incorporates both substantial growth and substantial decline. In this risky environment, we would encourage ICANN to focus on its core mission, that is providing the community with the requisite support, in order to foster the best policies. Ensuring diversity in the policy-making process also means ensuring that all members of a given policy process are materially able to participate equally.</p>	<p>Please see Section Funding, subsection Forecasting</p>
<p>Non-Commercial Stakeholders Group (NCSG)</p>	<p>Coming to the budget documents, the forecast in the registrar accreditations for FY21 is presented in absolute terms (p.12) These numbers should be provided in a relative fashion (such as percentages), as absolute numbers do not give an idea of the importance of the growth or decline, as the case may be.</p>	<p>Please see Section Funding, subsection Forecasting</p>
<p>Non-Commercial Stakeholders Group (NCSG)</p>	<p>On p.16 of the same document, it appears that, over FY21, ICANN is planning to fund meetings of both the European and Latin American components of ALAC, for a total sum of 170 000 USD. While we understand that this budget line was granted to ALAC on the basis of an agreement with ICANN, we question why it appears “featured” the way it is along with other core activities. Some internal discussion has not entirely shed light on the reasons some external meetings are singled out while others are not and we look forward to more information on the rationale behind that choice of presentation.</p>	<p>Please see Section Financial Management, subsection Expense Details</p>