

ICANN Organization’s Report of Public Comment Proceeding

Draft FY22–26 Operating and Financial Plan, and Draft FY22 Operating Plan and Budget			
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Section I: General Overview and Next Steps			
<p>ICANN’s Strategic Plan for Fiscal Years (FY) 21–25 was developed through a community-based process and adopted by ICANN’s Board on 23 June 2019. The Strategic Plan establishes a vision and a set of strategic objectives and goals in service of ICANN’s Mission. The Strategic Plan enables ICANN to fulfill its Mission and meet new and continuously evolving challenges and opportunities.</p> <p>On 17 December 2020, ICANN organization (or org) published the Draft FY22–26 Operating and Financial Plan and the Draft FY22 Operating Plan and Budget for public comment. During the public comment period, community webinars took place on 12 and 13 January 2021.</p> <p>ICANN org received submissions from 10 community groups and one individual. From those submissions, ICANN org identified 218 specific comments covering nine different themes. This report’s Appendix includes all comments and corresponding responses. Two submissions were received after the deadline for public comments. From these two late submissions, we identified six comments listed separately in the Appendix, along with a reference to a response.</p> <p>Following the public comment period, ICANN org held a public session at the virtual ICANN70 prep week, to discuss the community comments. These interactions helped ICANN org to develop better responses and identify appropriate revisions to the draft plans.</p> <p>The updated FY22–26 Operating and Financial Plan and FY22 Operating Plan and Budget will be presented to the ICANN Board for adoption at a Board meeting in May 2021.</p>			

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 FY22–26 Operating and Financial Plan and the FY22 Operating Plan and Budget are subject to Board approval.

Section II: Contributors

At the time this report was prepared, ten organizations and one individual posted comment to the forum. The following table lists these contributors in alphabetical order. Any quotations taken from contributor comments will reference the contributor’s initials.

Name	Submitted by	Initials
ARTICLE 19	Ephraim Percy Kenyanito	ARTICLE 19
At-Large Advisory Committee	ICANN At-Large Staff in support of the At-Large Community	ALAC
Business Constituency	Steve DelBianco	BC
Coordination Center for TLD .RU/.PΦ (ccNSO Community)	Maria Kolesnikova	TLD RU
Country Code Names Supporting Organization — Strategic and Operational Planning Committee	Giovanni Seppia	ccNSO-SOPC
Generic Names Supporting Organization Council	Berry Cobb on behalf of GNSO Council	GNSO
Governmental Advisory Committee	Robert Hoggarth on behalf of GAC	GAC
gTLD Registries Stakeholder Group	Elizabeth Bacon	RySG
Non-Commercial Stakeholders Group	Tomslin Samme-Nlar	NCSG
Registrar Stakeholder Group	Zoe Bonython	RrSG

Individuals:

Name	Affiliation (if provided)	Initials
Judith Hellerstein	At-Large Member	JH

Section III: Summary of Comments

General Disclaimer: This section summarizes comments in an overview grouped into nine 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 nine 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.

Public Comment Themes:

1. Document structure and/or future improvement suggestions
2. Financial management
3. Functional activities plans
4. Funding assumptions and projections
5. ICANN meetings, constituent travel and community engagement support
6. Operating initiative resources
7. Operating initiatives plans
8. Personnel and headcount
9. Progress measurement and reporting

Section IV: Analysis of Comments

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

Document Structure and / or future improvement suggestions

A total of 17 comments were received on this theme. Several comments pertained to recommendations that would improve ease of readability and clarity for the community.

Financial Management

A total of 21 comments were received on various aspects of ICANN’s expenses, financial assumptions and Funds Under Management in the draft documents.

Functional Activities Plans

A total of 20 comments were received regarding 12 of the 34 functional activities.

Funding Assumption and Projections

A total of eight comments were received on various aspects of ICANN’s funding assumptions.

ICANN Meetings, Constituent Travel, and Community Engagement Support

A total of 20 comments were received on this theme. These comments varied in scope; some indicated a need for more explanation of resources allocated to outreach.

Operating Initiative Resources

A total of 28 comments were received, generally seeking clarification of operating initiative resources planning in the draft documents.

Operating initiatives Plans

A total of 83 comments were received covering almost all of the 15 operating initiatives, seeking additional clarification or information on the initiative scope or progress planned.

ICANN Org Headcount

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

Progress Measurement and Reporting

A total of 13 comments were received regarding progress measurement and reporting.

TABLE OF CONTENTS

1. Introduction	7
2. The FY22–26 Operating and Financial Plan and the FY22 Operating Plan and Budget	7
2.1 Document Structure and/or Future Improvement Suggestions	7
2.1.1 Document Details and Length	7
2.1.2 Future Improvement Suggestions	8
2.2 Financial Management	8
2.2.1 Contingency	8
2.2.2 Expense Details	9
2.2.3 New gTLDs	9
2.2.4 General Data Protection Regulation	10
2.2.5 Professional Services	10
2.2.6 The Reserve Fund	11
2.3 Functional Activities Plans	11
2.3.1 Contractual Compliance	11
2.3.2 GDD Accounts and Services	11
2.3.3 Global Stakeholder Engagement and Regional Offices	12
2.3.4 Governance Support	12
2.3.5 Government and Intergovernmental Organization Engagement	12
2.3.6 ICANN Managed Root Server	12
2.3.7 Office of the Chief Technology Officer (OCTO)	13
2.3.8 Planning at ICANN	13
2.3.9 Policy Development and Advice	13
2.3.10 Policy Research and Stakeholder Programs	14
2.3.11 Risk Management	15
2.3.12 Strategic Initiatives	15
2.4 Funding Assumptions and Projections	15
2.4.1 Overview	15
2.4.2 Assumptions	15
2.4.3 Projections	16
2.4.4 Future Forecasts	16
2.4.5 Funding to Support Activities	16
2.5 ICANN Meetings, Constituent Travel and Community Engagement Support	16
2.5.1 ICANN Meetings	16
2.5.2 Constituent Travel and Additional Budget Requests (ABR)	17
2.6 Operating Initiatives Resources	19

2.6.1 Financials	19
2.6.2 Operating Initiatives Resources	19
2.6.3 Root Zone Management Evolution	20
2.7 Operating Initiatives Plans	20
2.7.1 Support the Evolution of the Root Server System	20
2.7.2 Facilitate DNS Ecosystem Improvements	20
2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking	21
2.7.4 Evolve and Strengthen the ICANN Community's Decision-making Processes to Ensure Efficient and Effective Policymaking	24
2.7.5 Develop Internal and External Ethics Policies	25
2.7.6 Promote and Sustain a Competitive Environment in the Domain Name System	25
2.7.7 Universal Acceptance	26
2.7.8 Root Zone Management Evolution	27
2.7.9 Evaluate, Align, and Facilitate Improved Engagement in the Internet Ecosystem	27
2.7.10 Through Targeted Engagement Improve Governments and Intergovernmental Organizations	28
(IGOs) Engagement and Participation in ICANN	28
2.7.11 Monitor Legislation, Regulation, Norms, Principles, and Initiatives in Collaboration With Others That May Impact the ICANN Mission	28
2.7.12 Formalize the ICANN org Funding Model and Improve Understanding of the Long-term Domain Name Market Drivers	29
2.7.13 Implement New gTLD Auction Proceeds Recommendations As Approved by Board	29
2.7.14 Planning at ICANN	29
2.7.15 Reserved Fund	30
2.8 Personnel and Headcount	30
2.9 Progress Measurement and Reporting	31
3. Appendix – Contributor Questions/Comments Received and Reference to Response	32
3.1 Public Comments Received	32
3.2 Public Comments Received after the public comment period deadline	76

1. Introduction

ICANN published for public comment the Draft FY22–26 Operating and Financial Plan and the Draft FY22 Operating Plan and Budget documents on 17 December 2020. Ten groups and one individual provided 218 specific comments.

Following the public comment period, ICANN org held a public session at the virtual ICANN70 prep week to better understand the comments. This session helped ICANN org to develop better responses and changes to the draft plans. ICANN org thanks the webinar participants for their participation and input.

This document provides ICANN org’s responses to the 218 comments submitted through the public comment process. Comments and responses are presented separately rather than in a side-by-side table. Readers will find all comments in the Appendix and responses organized by nine recurring themes in the following sections. Follow these steps to find responses to submitted comments:

- Locate community groups or individuals’ names in the left-hand column (the Contributor column) of the Appendix.
- View the comments submitted by groups or individuals in the center column marked with the heading “Question / Comment.” Multiple comments by the same group or individual are located sequentially in the center column.
- View the reference column, which displays the section of this document containing the response to the submitted comment.

ICANN org 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 FY22–26 Operating and Financial Plan and the FY22 Operating Plan and Budget

2.1 Document Structure and/or Future Improvement Suggestions

2.1.1 Document Details and Length

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 FY22–26 Operating and Financial Plan document is extensive and lengthy. As ICANN org considers that the community would likely focus on the areas of their interest, the draft plan is intentionally repetitive in places to make it easier for

readers to quickly find the content they seek, as a result, some sections in the draft plan might appear duplicative, for example, the Purpose and Strategic Goals and Targeted Outcomes Supported in each of the 34 functional activities for both the Five-Year and One-Year Plans are repetitive content. Thus, ICANN org enhanced this document with embedded navigation tools within the document.

ICANN org plans to improve the planning documents continually and will evaluate these suggested improvements for future planning cycles as follows:

1. Seek to improve how information is presented to and shared with the community. Presentation of information in a digestible manner will offer more transparency and accountability.
2. Review how to present progress reports that allow the community to gain insight and perspective.
3. Review a process to provide brief narratives that link achievements, ongoing work in the current fiscal year, and next year's plans and priorities would help the community to assess a project's progress toward its goal better.

2.1.2 Future Improvement Suggestions

Reviewers submitted comments about making the draft plan documents more accessible. ICANN org plans to evaluate the accessibility based on best practices such as the Web Accessibility Guidelines established by the World Wide Web Consortium (W3C) and the Web Content Accessibility Guidelines, WCAG 2.0. If updates or enhancements are needed to ensure documents meet accessibility guidelines, ICANN org will implement them starting in the FY23 planning cycle.

The gTLD Registries Stakeholder Group's comments regarding future improvements will be evaluated for the next planning documents cycle. This evaluation will be done as part of ICANN org's commitment to continually improving the planning documents' quality and content.

2.2 Financial Management

Estimating costs five years in advance requires many assumptions based on the best information available and scenarios of possible activities and effects. The Draft FY22–26 Operating and Financial Plan displays ICANN org's best estimate for future activities and needs based on data gathered from various sources. The cost category expenses remain relatively flat year-over-year due to cost reduction through leveraging economies of scale and continued process improvement. Also, 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 Contingency

Based on its fundamental principle of financial responsibility, ICANN org continues to ensure its expenditures remain within its available funding. However unplanned or variable expenses are expected due to the uncertainty of forward planning. To ensure funding is available to cover for such uncertainty, ICANN org budgets for contingency. The contingency corresponds to a budgeted amount of expenses but is unallocated to any specific activity function or cost nature to enable appropriate flexibility throughout the fiscal year. As stated in Draft FY22 Budget document, ICANN org budgets for contingency as part of its planning process. The contingency in the Draft FY22 Budget document is \$5.2M, or approximately four percent of total expenses.

This contingency amount remains unchanged based on historical usage compared to the previous year and will cover unforeseen and unpredictable FY22 expenditures.

Any department's request for contingency spend goes through a rigorous and extensive financial review process. Proposals are vetted and reviewed by the requesting executive, the Chief Financial Officer, and the President and Chief Executive Officer (CEO) for approval before any contingency spend occurs.

2.2.2 Expense Details

ICANN org agrees with comments supporting the ongoing assessment of underlying assumptions and inputs into financial expenditures. ICANN org evaluates expenses to ensure they are essential and to find spending efficiencies across departments. Many projects across ICANN org span multiple years and have consistent costs year-over-year. Also, ICANN org aims to balance overall expenses with the trend it sees for funding stabilization.

Compared to the FY21 Adopted Budget, funding set out in the FY21 Forecast is \$13.8M higher due to transaction levels remaining relatively flat to last year, whereas the budget incorporated an eight percent decline due to the global pandemic's economic uncertainties. The forecast has lower Travel and Meetings costs than was budgeted due to ongoing travel restrictions and hosting ICANN69 and ICANN70 virtually, partially offset by incremental operating initiatives of \$2M for Security, Stability, and Resiliency (SSR) initiatives. The contingency amount in the forecast represents the amount of contingency not yet allocated for FY21. Actual spending is captured in the appropriate cost category. Lastly, there was an accounting change for software development costs resulting in a transfer of expenses from the professional services category to capital.

A change in accounting treatment for the Information Transparency Initiative (ITI) project drove the increase in capital in the FY21 Forecast versus the FY21 Adopted Budget. Work performed for software development previously classified as professional services was reallocated to capital. Also, due to the timing of the work performed for the ITI project, there are more capital expenses than initially planned.

The line item for Cost Savings Initiatives in the Draft FY22 Budget represents amounts that ICANN org is reviewing within the overall budget to find efficiencies and cost savings. Since the budget is estimated seven months in advance of the fiscal year's start, ICANN org proactively reviews expenditures that may benefit from economies of scale across the organization.

After reviewing the Draft FY22 Budget, ICANN org noted a few discrepancies and errors in the constituent traveler figures found in Section 3.3 Travel and Community Engagement. The Governmental Advisory Committee (GAC) travelers for ICANN74 were overstated. There should have been 40 GAC travelers listed for ICANN74 instead of the 74 travelers that were listed. The expected travel rates listed for ICANN72 and ICANN74 were reviewed, updated and realigned. The Proposed for Adoption version of the FY22 Budget will reflect these travel rate changes.

2.2.3 New gTLDs

In section 5.1 of the FY22 Budget ICANN org provides a multi-year view of historical actuals, current FY22 Budget, and Forecast for FY23 and Beyond for the New gTLD Program. The New

gTLD Program reimburses ICANN for program costs, staff costs, and risk costs paid through the ICANN Operating Fund.

The \$75M shown in Section 6 Funds Under Management of the Draft FY22 Budget for NgTLD Funds differs from the cumulative funds through FY22 shown in Section 5.1 of the Draft FY22 Budget due to both timing and accounting procedures. The \$75M NgTLD Fund includes the balance of \$16M in Applicant Fees (Net of Refunds) for the program's remainder. ICANN org collected all the Applicant Fees in 2012. The Applicant Fees are recognized based on the entire program's percentage completion, which comports with the applicable generally accepted accounting principles (GAAP). The Profit and Loss statement will not recognize all Applicant Fees until the program completes, but the NgTLD Fund includes the balance of money collected. Modest investment gains of \$3M are estimated for FY21 and FY22 but not included in the multi-year view as ICANN does not budget for investment income. Lastly, the ICANN Operating Fund pays some of the New gTLD program costs. Periodically, ICANN org transfers money from the NgTLD Fund to reimburse the ICANN Operating Fund. Still, a timing lag occurs from when the expenses are incurred for the New gTLD Program to when the NgTLD fund reimburses the ICANN Operating Fund.

The Draft FY22 Budget does not include any headcount or costs for the next round of gTLDs. The next round of gTLDs will be a self-funded program similar to the 2012 round. A self-funded program means that collected application fees will cover the costs for this program. This will not be funded through the ICANN Budget. There is ongoing work with the Board, community, and organization to better define this program. With Board approval of the policy recommendations resulting from the New gTLD Subsequent Procedures Policy Development Process (SubPro), ICANN org will begin resourcing for this program.

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 FY22. Even with another year of actual GDPR expenses incurred, it remains challenging to predict costs, especially of legal matters. Instead of inaccurately budgeting for unforeseen expenses, ICANN org will use contingency funds for GDPR-related expenses in FY22. The only exception is GDPR-related travel and temporary resources, which have been budgeted at the department level.

2.2.5 Professional Services

Generally, about 50 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 changing technical needs and the lower cost of contracting out. About 25 percent is legal services for such items as contracted party agreements, accreditation matters, litigation and dispute resolution. About 12 percent covers ICANN's language service needs, such as translation and transcription services related to ICANN Public Meetings. The remaining Professional Services are distributed across various categories.

ICANN org is open to discussions with community groups on the best use of resources to aid in the advancement of community-based activities. In lieu of increasing the ICANN org headcount, consultants have been utilized as a secondary method of providing support and resources without creating excess headcount for projects that have limited timelines.

Professional Services increased from the FY21 Forecast to the FY22 Budget due to the planned reinstatement of face-to-face meetings. The FY21 Forecast assumes that ICANN69 and ICANN70 would be held virtually. Once meetings return to a pre-pandemic level, there will be incremental costs for audiovisual, medical support, security, and other promotional item costs associated with hosting face-to-face meetings.

FY19 Professional Services were higher than those of the FY22 Draft Budget driven by increased support needed for the Information Transparency Initiative (ITI) and GDPR legal matters in FY19. Professional Services in FY20 and FY21 were impacted by the COVID-19 pandemic but are expected to return to higher levels in the future. In addition, ICANN org continually strives to find operational efficiencies and prioritize spending on strategic objectives and goals.

2.2.6 The 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 slightly below its target level, the five-year financial plan sets out a strategy to ensure replenishment in keeping with the Board-approved timeline.

As stated in the FY22 Budget in Section 6 Funds Under Management, \$10M will be transferred to the Reserve Fund from the net excess generated in FY20. The \$10M planned contribution to the Reserve Fund was awaiting approval when the FY22 Budget was published. ICANN org expects the Board to vote on a resolution of the FY20 net excess at ICANN70. After the \$10M is transferred from FY20 net excess, the Reserve Fund will be at the target level set forth in the investment policy.

The five-year financial plan incorporates Reserve Fund contributions each year. Additionally, each year ICANN org will assess any incremental net excess amount in the Operating Fund to determine if any is available for transfer to the Reserve Fund. 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 only as a last resort method. Before tapping into reserves, ICANN org would use alternative measures, such as using its contingency fund or reducing costs to meet demands of unforeseen expenses or lower-than-planned funding.

2.3 Functional Activities Plans

2.3.1 Contractual Compliance

ICANN org has noted the comment from the ccNSO Strategic and Operational Planning Committee (SOPC) regarding the Strategic Goals and Targeted Outcomes for the Draft FY21-26 Operating Plan for the functional activity of Contractual Compliance.

2.3.2 GDD Accounts and Services

The ccNSO SOPC commented that promotion of a competitive environment in the DNS was missing from the section of the functional activities for GDD Accounts and Services called operating initiative

contributions. The GDD Accounts and Services team defines and improves services for contracted parties to facilitate their compliance with Consensus Policies and contractual obligations. This work is listed in the Activities section. ICANN supports contracted parties to ensure that those of all sizes and business models can utilize the services effectively and that Consensus Policies' obligations are implementable.

2.3.3 Global Stakeholder Engagement and Regional Offices

As it relates to the Global Stakeholder Engagement resources by region, the Global Stakeholder Engagement budget is allocated across the regions according to engagement needs and plans. In addition, the international Office Strategy outlines the strategy for ICANN's regional presence. ICANN published an International Office Strategy in 2017 at <https://www.icann.org/news/blog/our-international-office-strategy>.

2.3.4 Governance Support

The ccNSO SOPC noted that establishment of a contract management database was not listed in the How Progress is Tracked section of Governance Support Functional Activity. ICANN org will incorporate the establishment of a contract management database into a project surrounding an organization-wide document management system. This document management system project will be developed and implemented in phases.

2.3.5 Government and Intergovernmental Organization Engagement

The Operating Plan for Government and Intergovernmental Organization Engagement Functional Activity includes the next Annual Virtual Global Internet Governance Forum 2021 engagement plan. In addition, ICANN will continue the dialog with the community to seek effective mechanisms for information and feedback on governmental activity relevant to ICANN and inform the ICANN community about opportunities to provide public comment on governmental activities pertinent to the community.

Regarding the ten strategic goals listed on pages 113-114 of the FY22-26 Operating and Financial Plan document, these encompass related government and Intergovernmental Organizations (IGO) activity. ICANN org continually seeks to improve the planning documents' quality and content and will evaluate this for future planning cycles to ensure more details in the goals demonstrating focus on IGOs and on the national governments.

2.3.6 ICANN Managed Root Server

With reference to the description that “maintain a low total cost” is not an activity, ICANN agrees as it is the qualifier to building the capacity of the ICANN Managed Root Server. As to the recommendation to include an awareness-raising and educational component of activities for the ICANN Managed Root Server please note that the “awareness-raising/educational component” is encompassed in “RSS Community engagement.”

2.3.7 Office of the Chief Technology Officer (OCTO)

As it relates to internal and external capacity-building activities included in the FY22-26 Operating Plan, ICANN org has various capacity-building activities globally. Over the past six months, ICANN org conducted more than one hundred different hands-on training and technical webinar sessions around the world. The org will publish a dedicated page for its capacity-building activity on icann.org, including the course catalog, which currently includes 12 different modules. The engagement team is also working with the ICANN Online Learning team to increase technical online courses on the ICANN Learn platform. During ICANN Public Meetings, OCTO conducts How it Works (HiW) sessions to explain some of the critical technical Internet services impacted by ICANN’s Mission, including policy development work driven by the community.

ICANN org understands that multiple community groups share concerns about community workload and the need to provide sufficient staff support for the community’s work. The ICANN org Executive Team is engaging with the Chairs of the ICANN Supporting Organizations and Advisory Committees to facilitate the community’s planning of its work from year to year (including prioritization of work). This engagement aims to ensure that ICANN org provides resources to projects and activities on topics deemed a priority for the community and various groups. This will allow ICANN to more fully assess and adjust its staffing levels going forward to align with the community’s identified needs for priority work.

2.3.8 Planning at ICANN

As it relates to the ways progress is tracked in the Planning at ICANN Functional Activity, ICANN org continually seeks to improve the planning documents’ quality and content so that progress measurement and reporting of achievement of the plans is a future planning improvement. See the section of this report on Progress Measurement and Reporting for more information.

2.3.9 Policy Development and Advice

Regarding the allocation of staff resources needed to support the full implementation of the At-Large Review Implementation, ICANN org understands that multiple community groups share concerns about community workload and the need for sufficient staff support for the community’s work. The ICANN org Executive Team is engaging with the Chairs of the ICANN Supporting Organizations (SOs) and Advisory Committees (ACs) to facilitate the community’s planning of its work from year to year (including prioritization of work). This engagement helps to ensure that ICANN org provides resources to those projects and activities the community and various groups identify as priority topics. Thus, ICANN org will be able to more fully assess and adjust its staffing levels going forward to align with the community’s identified needs for priority work.

The GNSO Council commented that the initiatives, tools and resources associated with PDP 3.0 should be explicitly individualized in the activities to enable the GNSO Council to adequately evaluate whether the recommended changes associated with PDP 3.0 are being adequately funded. As PDP3.0 was a particular initiative intended to inform and improve the GNSO's conduct of all its policy processes, ICANN org is not able to individualize the resources that support the work in the manner requested by the GNSO Council. ICANN org will be happy to meet with the GNSO Council to discuss whether and how, in the future, more specific ways can be identified to allocate and report on funding for different types of policy activities and projects.

Regarding maintaining adequate staffing for Policy Development Support, the overall staff numbers remained steady. To the extent that the GNSO and wider community choose to take on additional work requiring more staff support, ICANN org requests notification of these new, different, or expanded projects and activities so that resource allocation and, if necessary, additional staffing, can be planned for and managed.

ICANN org notes the GNSO Council's suggestion to provide information grouped by portfolio and project and associated project ID numbers. ICANN org will consider the feasibility of providing this information in light of the current budgeting and accounting practices in future budget documents. Finally, non-personnel expenses describe a range of expenditures associated with support for the community's policy development and advice work, such as meetings, travel, administration, and professional services.

Regarding how ICANN org evaluates the need for and funding of policy support, ICANN org will review how it presents the budget documentation to the community in future budget cycles. With respect to estimating policy support levels needed to facilitate the community's policy work, ICANN org relies on a combination of factors, such as each community group's projected work plans, the status of ongoing work, the workload of existing staff, and the org's overall staffing needs and available resources. It is important that the community clearly prioritize and plan its work over the short and longer term to enable a more accurate estimate of resourcing and support needed.

2.3.10 Policy Research and Stakeholder Programs

Related to work with the ccNSO and the GAC to develop consensus recommendations in the functional activities plans for Policy Research and Stakeholder Programs, the high-level description includes the function's work in supporting community work. The Policy Research and Stakeholder Programs team does provide subject matter support to help inform the ccNSO and GAC considerations during their respective processes. ICANN org is updating this section of the Operating Plan to include explicit reference to Supporting Organizations and Advisory Committees.

There was commentary about the sufficiency of FY22 resources to support data, research, and study project requests for implementation work for 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 (SubPro) PDP and RPMs PDP. The Board must first direct the org to allocate funds and resources to implementation of recommendations. Thus the numbers do not account for projected resources for PDP recommendations on New gTLD Subsequent Procedures,

Rights Protection Mechanisms (RPMs), and Registration Data (EPDP Phase 2). ICANN org agrees that these are significant undertakings, especially if implemented simultaneously, and that resources must be carefully planned and allocated. As the comment describes, this function will play a key role in leading and supporting much of the implementation work, and as such, will require more resources. One should also note that project resource needs extend into other functions, e.g., Policy Development Support, Legal, and others.

2.3.11 Risk Management

Regarding comments received from the ccNSO SOPC on the Risk Management Functional Activity, ICANN org suggests that preventing all risks is not the definition of risk management. Instead, risk management is about managing risks and not eliminating all risks. This concept of risk management is widely understood by risk management professionals, used in ICANN org's definition of its own risk management activities, and has been discussed with the Board.

The assumptions wording will be revised as follows: "The Strategic Plan does not create any new risks or challenges for the Risk Management function. The Strategic Risks in the Strategic Plan are included in the work done by the Risk Management function in its normal operations."

2.3.12 Strategic Initiatives

Regarding the comment received from the ccNSO SOPC on the metric included in the Functional Activity for Strategic Initiatives, Strategic Initiatives's work is to ensure coordinated management of cross-functional initiatives across the organization. The global comment listed at the beginning of this section is intended to capture how progress is tracked using ICANN's project management framework.

2.4 Funding Assumptions and Projections

2.4.1 Overview

ICANN org has estimated funding for the FY22-26 period using conservative assumptions and approximately one year of experience analyzing budget during the COVID-19 pandemic. As noted, funding reflects slight growth per year and contributions for ICANN Security, Stability, and Resiliency (SSR) activities.

2.4.2 Assumptions

The FY22 Budget assumes registrar counts will grow compared to the FY21 Forecast. ICANN org projects the total number of registries to decline, mostly due to inactive TLDs (such as Brand TLDs) terminating. The decline in registries would result in a corresponding drop in Registry Fixed Fees. However, the FY22 Budget assumes that the domain market will expand steadily in line with prior years and thus increase the number of active contracted parties. That growth is reflected in the slight increase in ICANN org's Transactions.

ICANN org conservatively estimated the registrar counts. With an FY21 starting point of about 2,450, ICANN org assumes this number will drop to about 2,328 at the end of FY21. In FY22, the domain market's slight rebound is assumed, and the numbers of registrars will steadily increase in line with historical averages such that FY22 will end with about 2,356 registrars.

2.4.3 Projections

The Financial Projections section in the FY22–26 Operating and Financial Plan has a key difference versus the Financial Projections published in FY21 plans. In the FY21–25 Plan included an "operating initiatives Envelope" below the "Funding less Expenses" line. In this year's publication for FY22–26, ICANN org included these "Incremental operating initiatives" above the line because they reflect the organization's "Total Operating Expenses." Therefore, if one wanted to compare this year's Total Operating Expenses with the prior year's, one would have to add the "operating initiatives Envelope" to the prior year's expenses. By doing so, Total Operating Expenses would be \$682.8M in FY21–25 versus \$734.8 in FY22–26.

The \$52.0M growth in expenses is driven by having \$56.8M more in funding during the FY22–26 period. The FY21–25 plan was adopted while the economic impact of the COVID-19 pandemic was unknown and ICANN org planned very conservatively. In the FY22–26 plan, ICANN org has developed funding projections based on prior trends and its experience of the pandemic so far.

The increase in projected funding allows ICANN org to hire more staff and vendors, invest more in capital, and contribute more to the Reserve Fund to help ICANN fulfill its Mission and maintain its financial stability.

2.4.4 Future Forecasts

ICANN org appreciates the positive response to comparing the Draft FY22 Budget against the FY21 Forecast. The format of the staff report of public comments is not the best forum to present an updated FY21 Forecast, but this will be considered for the FY22 Adopted Budget.

2.4.5 Funding to Support Activities

ICANN org believes its funding is adequate to support its recurring activities, even as travel restrictions lift and operations resume to pre-pandemic levels. From the Public Comment responses, ICANN org recognizes the appreciation of its GDS and Policy teams in facilitating effective operation of gTLD registries and registrars. These teams will continue to be supported.

ICANN org believes its contingency amount is sufficient to cover unplanned activities or events. If funding is impacted significantly beyond the scope of what the contingency can accommodate, ICANN org has other methods of ensuring that funding does not exceed expenses. In such a catastrophic event, ICANN's operations would likely be impacted so expenses would naturally be lower or can be deliberately lowered by delaying projects, travel, and meetings. Also, as a method of last resort, ICANN org can leverage the Reserve Fund, which is meant for this type of an emergency.

2.5 ICANN Meetings, Constituent Travel and Community Engagement Support

2.5.1 ICANN Meetings

ICANN org acknowledges that the future of face-to-face meetings may have many new requirements or changes as a result of the COVID-19 pandemic. Since many of these changes are still unknown and/or under review, ICANN org has continued to budget per prior travel guidelines. In the case that future face-to-face meetings require incremental funds, ICANN org will evaluate the needs at that time and can utilize contingency funds if appropriate.

ICANN has banned travel and face-to-face meetings due to the COVID-19 pandemic. The situation is highly complex and extremely fluid. As part of return to normal operations strategy, ICANN org is developing robust and adaptive risk assessment and risk mitigation measures so that ICANN can conduct meetings safely when the time is right. All options are being considered in line with international best practices and government/international agency (WHO/ECDC/CDC) guidance.

Regarding the RySG's comment about carbon footprint impact, ICANN org continues to evaluate its existing carbon footprint by working with its travel provider. As part of its pandemic response, the ICANN Board is engaging with the community to assess the past Public Meeting experience and further innovate ICANN org's support for virtual Public Meetings. ICANN org looks forward to continuing consultation with community leaders about the evolution of future Public Meetings and potential impact to the carbon footprint.

The ICANN meeting budget variances at repeat locations noted by the Business Constituency (BC) are mainly due to differences in travel rate and estimated travelers. ICANN67 for Cancun had initial airfare estimates, but after review of actual airfare rates for that public meeting it became evident that airfare rates were lower than anticipated. These lower airfares are reflected in the ICANN70 Cancun budget. For The Hague, fewer ICANN staff travelers are estimated for ICANN74 vs ICANN71, and therefore the lower budget for ICANN74 vs ICANN71 at The Hague. To clarify the ccNSO SOPC's comment regarding the \$2.2.M driven by reinstating face-to-face meetings, the FY21 Forecast took into account that ICANN69 and ICANN70 would be held virtually. The incremental Travel and Meeting spend for the FY22 budget estimates that all ICANN Public Meetings would return to the face-to-face format. ICANN org acknowledges that Travel and Meeting expenses might change as a result of potential new operational priorities post the global pandemic. However, ICANN org does value the collaboration and working relationships that can only occur by the community meeting face-to-face and does not want to undermine this importance in light of cost savings.

In addition, cost savings noted come from ongoing efforts to find efficiencies within the ICANN org operations budget. Since the budget is usually estimated at least six months in advance, the cost savings represent possible anticipated savings due to changes in strategic objectives and operations.

2.5.2 Constituent Travel and Additional Budget Requests (ABR)

The GNSO Council requested additional event details of items listed under 3.3.1 of the Draft FY22 Budget. The items listed in section 3.3.1 Constituent Travel refer to all SO/AC activities managed through the ICANN Constituent Travel department. The FY22 Budget includes additional SOAC support, but is not clearly stated in this section. ICANN org is working on a better report format to more comprehensively communicate and display all the support given to SOs and ACs throughout ICANN org.

In response to the ALAC comment regarding EURALO General Assembly funding, ICANN org will evaluate all event costs and provide adequate funding to cover the initial budget and associated “Additional Budget Requests” if the EURALO General Assembly is rescheduled for FY22. Similarly, ICANN org will ensure budgets include adequate funding for RALO events. If for some reason a RALO meeting is not in the core budget for a year in which it occurs, the organization will utilize contingency funds to support the meeting.

The NCSG commented on the funds budgeted for the GAC and ALAC. In response:

- After reviewing the Draft FY22 Budget, ICANN org noted a few discrepancies and errors in the constituent traveler figures found in Section 3.3 Travel and Community Engagement. The Governmental Advisory Committee (GAC) travelers for ICANN74 were overstated. There should have been 40 GAC travelers listed for ICANN74 instead of the 74 travelers that were listed. The expected travel rates listed for ICANN72 and ICANN74 were reviewed, updated and realigned. The Proposed for Adoption version of the FY22 Budget will reflect these travel rate changes.
- The At-Large community consists of 230 At-Large Structures and 85 individual members around the world. Community Regional Outreach Program (CROP) is a special initiative that ICANN supports to increase community involvement and participation.

ICANN org developed the Latin American and Caribbean Islands Regional At-Large Organization (LACRALO) and North American Regional At-Large Organization (NARALO) General Assembly budgets using travel support categories including airfare, hotel, a set stipend per person, and visa costs based on estimated need for visas. The budgets also include identical catering costs based on the same number and format of meetings and social events. The budget allocated for the LACRALO and NARALO General Assembly events is primarily due to the number of At-Large Structures in each RALO. LACRALO currently has 53 At-Large Structures while NARALO has 19. Given the number of languages spoken in LACRALO, the LACRALO General Assembly also requires interpretation in English, Spanish, French and Portuguese. The LACRALO budget also includes costs associated with interpretation equipment and services.

In response to the BC’s comment on the ABR application, ICANN org did not display that \$30K was approved for the core budget to cover general communication requests. The \$15K that the BC requested in FY21 is included in this \$30K. ICANN org will update the ABR section in the FY22 Budget to appropriately reflect these items as FY22 core budget.

Regarding the ABR procedure mentioned by the RySG, each year, a team of executives and other personnel manage the ABR process in accordance with published guidelines aiming to ensure transparency and equity across all SOs and 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 RySG, ICANN org encourages the RySG to work with the GE team to identify specific opportunities and topics for which training can be developed or provided.

2.6 Operating Initiatives Resources

2.6.1 Financials

The GAC commented that governmental regulatory attention related to Internet issues has become one of the key factors impacting the current Internet ecosystem, and in particular ICANN, in recent years. Noting that ICANN is committing resources in each of the mentioned functional activities above (see, Financial Estimates Table at page 182 of the of the Operating and Financial Plan document), the GAC reaffirms its commitment to ICANN's Mission to ensure the stable and secure operation of the DNS.

2.6.2 Operating Initiatives Resources

Several community groups provided comments related to the operating initiatives Resources. operating initiatives describe how ICANN org will achieve the objectives and goals set out in the ICANN Strategic Plan. The 15 operating initiatives listed in the plan represent significant areas of work supporting the strategic objectives identified in the Strategic Plan. The functional activities of the financial plan and the core budget included resources for operating initiatives.

Several operating initiatives need incremental resources that are outlined on the Five Year Financial Projections tables on page 180 and page 181 of the Operating and Financial Plan document. These amounts relate to the incremental or additional expenses for operating initiatives that require resources in addition to functional activity plans. An additional table of incremental expenses budgeted by the Operating Initiative by year, including FY22, will be added to the Draft FY22–26 Operating and Financial Plan and the Draft FY22 Operating Plan and Budget documents. The budget for some operating initiatives is included in the functional activities' core budget or the implementation is self-funded such as SubPro and Auction Proceeds.

The Five-Year operating initiatives projections highlight the financial estimates for the operating initiatives requiring resources in addition to the plans indicated in the functional activities. 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. ICANN org will continue to refine these estimates as it determines relevant costs and efforts.

The RySG commented that the budget should include an overview of anticipated costs and support for initiatives that are awaiting Board consideration but where implementation is expected to commence within this FY22 Budget term. Understanding that for initiatives awaiting Board consideration (e.g., RPM and SubPro recommendations) the expenditures would be estimated. The contingency is an amount included in the budget, but not allocated to any specific activities. This allows for the flexibility to cover the difference between projected and actual costs, expenses impossible to forecast, or activities that the Board has approved for implementation after the budget was finalized.

The BC noted the desire to develop mechanisms to alert the community about issues relating to rapid growth of the Root Zone, a monitoring system to collect data on the operations of the Root Server Systems as discussed in RSSAC 047, and mechanisms to further distribute and scale the Root of the DNS. More details would be required before ICANN org can judge if the

budgeted midpoint sum of \$4.5M would be adequate over the five-year period. ICANN org seeks to improve the quality of the documents describing the incremental expense for operating initiatives will be evaluated as the operating initiative progresses. ICANN org will also evaluate the use of graphs or other analytical charts for future planning cycles. The BC encourages ICANN to conduct more DNS ecosystem health research.

2.6.3 Root Zone Management Evolution

ICANN org was asked whether ICANN org's Engineering and IT resources and one FTE on the Internet Assigned Numbers Authority (IANA) functions team deployed to provide product management, design and requirements setting, are new hires or realignments that do not impact the overall headcount. These staffing resources are existing staff tasked with this project, not new hires.

2.7 Operating Initiatives Plans

2.7.1 Support the Evolution of the Root Server System

ICANN org appreciates the RySG's interest in the ongoing strength of the Root Server System and its support for the plan to evolve its governance. ICANN org also thanks the RySG for its comments on OCTO-016, which will be addressed in the planned revision of that document. ICANN org acknowledges the RySG's request for additional clarity about how the activities of the root server operators will be funded. The Root Server System Governance Working Group (GWG) is the core of the community-driven process to develop a cooperation and governance model for the Root Server System. The eventual governance model being developed by the Root Server System GWG may address the issue of funding for the root server operators, but the process is still in its early stages and funding details are not finalized.

ICANN org thanks the BC for its support of ICANN's plan to continue to support and collaborate with key stakeholders in ensuring the stability, security, and resilience of the DNS root zone and the evolution of the root servers.

Future Key Signing Key (KSK) rollovers of the type conducted in 2018 are not expected to incur material costs above and beyond those incurred for normal KSK management operations. Exceptional one-time costs for the first KSK rollover included convening a design team and performing extensive community consultation on the approach. ICANN now has a proven model that can be repeated for future rollovers.

2.7.2 Facilitate DNS Ecosystem Improvements

ICANN org is currently investigating its potential role in DNS Security Facilitation. The President and CEO formed a Technical Study Group to provide suggestions to the organization on how ICANN can best facilitate DNS Security. Those recommendations are forthcoming. Although the recommendations are to the President and CEO, they will be made public and will be a topic of discussion with both the Board and the community. With regards to the use of artificial intelligence to understand abuse trends, ICANN is undertaking exploratory research to discover if and how machine learning can be applied to studies of DNS Security threats. As with all research carried out by ICANN org in this area, the results, findings, and methodology will be shared publicly once they are beyond the exploratory phase. If this is an area of greater interest

to the RySG, ICANN org would happily enable workshops for discussions on the use of machine learning for the community.

ICANN org agrees with the BC that improved DNS security provided by DNSSEC and DANE is vital. ICANN org has long supported, and continues to advocate for, these important security technologies through capacity-building initiatives.

ICANN org will continue to work with businesses in the various regions to increase the reach of technical engagement, particularly in capacity development. ICANN org's tools and capacity-development/training programs target business as partners for the implementation of best practices for secure DNS operations.

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

As the initial Implementation Assessment Plan for the Cross-Community Working Group on Enhancing ICANN Accountability Work Stream 2 (WS2) makes clear, implementing the number and range of Board-approved WS2 recommendations is a significant undertaking that will involve considerable time and resources. ICANN org's new Planning function has been tasked to develop a detailed implementation plan involving a new team of 15 subject matter experts across ICANN org. ICANN org will update the community soon about the status of the implementation planning work.

Many of the WS2 recommendations apply to the community or will require community input before implementation can begin. The Cross-Functional Project Team has begun to discuss how ICANN org can best support community groups as they begin to plan for implementation of relevant WS2 recommendations, especially in light of the community's overall workload. ICANN org will engage with the community on how to best provide this support. More updated and detailed costs estimates will be provided as implementation planning continues.

Regarding the work plan to Enhance ICANN's Multistakeholder Model, the Board set out an approach toward continuous improvements building on existing community work reflecting three priority areas. See <https://www.icann.org/en/system/files/files/enhancing-effectiveness-multistakeholder-model-14oct20-en.pdf>. The Board also proposed development of an evaluation method to track progress on these existing work streams that is connected to the overall evaluation of the relevant objective in the Strategic Plan.

ALAC expressed appreciation for the particular focus in this (FY22) Draft Budget on facilitating diverse and inclusive participation — a key issue the community identified as urgent.

Regarding expenses in FY22 for this Operating Initiative, an additional table of incremental expenses budgeted by year including FY22 will be added to the Plan documents. The budget for some operating initiatives is included in the functional activities' core budget across the teams contributing to this Operating Initiative.

Regarding the GNSO Council's comment, with the launch of ICANN org's Project Management Framework, ICANN org encourages all its functions to adopt a project/program management

approach to their work, including support for the community's policy projects. Also, ICANN org has been working on a customer relationship management (CRM) solution likely to improve efficient management of the policy process across the various community structures.

The operating plan for the operating initiative Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking expressly acknowledges the possible need for a program or project manager to support the community's policy projects and activities' full breadth. ICANN org hopes that the outcome of the planning and prioritization process will demonstrate the extent to which additional staffing is needed and what type of skills and expertise might be necessary (e.g., project management and possibly others).

About external support (e.g., consultants, professional facilitators or subject matter experts), ICANN org continues to encourage the GNSO Council to use the various planning tools at its disposal to formulate specific and early requests for such support as much as feasible, to better facilitate budgeting for additional resources.

ICANN org appreciates the feedback that the GNSO Council and community provided to the meetings survey and the discussion contributions (e.g., at ICANN69 and with the SO/AC leaders) on how ICANN org can better support the community's work in a virtual environment. ICANN70 will see several improvements (e.g., in live interpretation and real-time transcription services) implemented following testing and a full internal review, based on the community's feedback through the survey and these discussions.

The COVID-19 pandemic remains uncertain. The ICANN Board and ICANN org Executive Team monitor developments closely so that decisions to resume face-to-face meetings — whether regionally or as smaller, focused meetings to progress work by a specific group — are made according to the latest and most comprehensive information. The Board and org remain committed to continuing support for the community's policy work throughout this time and toward resuming face-to-face meetings when safe, in accordance with the approach described in the paper on “Phased Return to Face-To-Face Meetings” published before ICANN69.

Regarding aspects of progress measurement, ICANN org agrees that membership tracking by SOs, ACs, stakeholder groups, and constituencies alone do not necessarily reflect the actual extent of progress of particular initiatives. The Draft FY22-26 Operating and Financial Plan lists other factors that ICANN org also measures, to supplement the membership tracking mentioned earlier, such as the level of participation in Public Comment proceedings. ICANN org cannot unilaterally evaluate the level of skills across participants in policy development processes and the definition of “commitment” can be subjective. ICANN org welcomes community suggestions for improving progress tracking and reporting of policy work across the community.

ICANN org is replacing the old Accountability Measurements with new performance indicators. ICANN has collected statistics on capacity development and training events for several years. ICANN's engagement teams often work closely with regional TLD organizations, registries, and registrars in delivering regional and local training and capacity development events, even in the current virtual environment.

ICANN will continue to support transparency around ICANN's government and IGO engagement activities. ICANN org regularly communicates government and IGO engagement activity to the GAC, which is published on the GAC website. ICANN org will strive to provide

reporting on new initiatives, as they develop, in reports such as the GE publications. In addition, ICANN org will continue to publish reports on outreach, technical briefings, and capacity development sessions for the GAC.

ICANN org agrees that proper scoping that takes into account specific objectives and includes precise and manageable tasks is key to effective decision-making. The Public Responsibility Support function provides regular training for community leaders and group chairs. The function is also currently developing modules for ICANN org's ICANN Learn online platform to offer training on essential consensus-building skills. Also, as the result of an Additional Budget Request submitted by the GNSO Council in FY20, an external expert was retained to develop a Consensus Playbook to assist community groups and leaders with managing and driving toward decisions. ICANN org welcomes suggestions from the RySG and the community about specific types of training that will be helpful in supplementing or expanding existing opportunities.

Hiring criteria for Policy Development Support staff emphasize skills and experience in facilitation, writing, and group management in a global and diverse environment.

Regarding resources, the proposed addition of a project manager to ICANN org's Policy Development Support function was envisaged to be a full-time hire to assist with the management and tracking of all projects supported by the policy staff. With the recent rollout of ICANN org's Project Management Framework and the community's expected workload, this staff hire may need to have different or additional expertise and responsibilities, such as experience managing programs instead of projects. ICANN org will review current and expected needs prior to the start of the hiring process.

ICANN org agrees that relevant aspects of PDP 3.0 can and should be used by community groups and work efforts outside the GNSO.

The BC continues to believe that the PDP 3.0 is an important step towards the improvement of the multistakeholder model. The recent rollout of an org-wide Project Management Framework is meant to provide a uniform approach for the scoping, initiation, management and conclusion of projects within each ICANN org function. ICANN org staff are being trained on the Framework and associated tools. The Framework was developed to be flexible so as to be usable by different functions for multiple types of projects.

Also, PDP 3.0 and progress on the priority areas identified as part of the Evolution of the Multistakeholder Model work should contribute toward reducing overlap and increasing clarity as to expected outcomes, especially in relation to the need to more precisely scope community work.

The Project Management Framework and associated templates and tools are intended to enable more accurate and comprehensive planning, tracking and management of all projects, including policy development processes. A key factor in improving the effectiveness of the multistakeholder model is to eliminate work overlap by clarifying ongoing processes and their expected outcomes. This means that projects will need better defined goals from the start and cannot rely on organic discovery of issues as work unfolds. More research is needed so that discussions take place on top of a solid and fact-based foundation.

ICANN org provides support for the community's work through staff and other resources (e.g., reports, external experts where appropriate, and support for ICANN Public Meetings). The

community receives services and support for a range of activities, from policy development and advice work to outreach and engagement. Through the regular planning and budget cycle, ICANN org consults with the community as to whether the Draft Budget's estimates and details reflect the community's understanding of how resources are to be allocated. In addition, the yearly Strategic Trend Outlook exercise involving the Board, org, and community groups is an important source of information for updating ICANN's Strategic Plan. The ICANN Board and the ICANN President and CEO also regularly publish priorities and goals, and provide updates (e.g., via blog posts) about progress.

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

The GNSO Council noted that ICANN org should provide Working Group Chairs with the tools and support to help ensure effective and efficient leadership. With the launch of ICANN org's Project Management Framework, ICANN org is encouraging all its functions to adopt a project/program management approach to their work, including support for the community's policy development projects. In addition, ICANN org has been working on a CRM solution that is likely to facilitate more efficient management of the policy development processes across the various community structures.

ICANN org's FY22–26 Operating and Financial plan expressly acknowledges the possible need for a program or project manager to support the full breadth of the community's policy projects and activities. ICANN org is hopeful that the planning and prioritization process outcome will demonstrate the extent to which additional staffing is needed and what type of skills and expertise might be necessary (e.g., project management and possibly others).

In relation to external support (e.g., consultants, professional facilitators or subject matter experts), to better facilitate budgeting for additional resources ICANN org continues to encourage the GNSO Council to use the various planning tools available to formulate specific and early support requests as much as feasible.

Concerning the ccNSO SOPC's comment about developing the community's data analysis and related skills, this was identified as a consideration that could impact the goal of evolving and strengthening the multistakeholder model. ICANN org facilitates and supports community efforts in capacity building, including ICANN Learn course development. If the community agrees that data analysis and related skills are increasingly necessary, ICANN could consider developing an ICANN Learn course in this area.

The ccNSO SOPC expressed concern regarding the sufficiency of personnel to support existing and future policy development and advisory work. ICANN org's Executive Team has been engaging with the SO and AC Chairs, as part of a collaborative effort to improve planning and prioritization of the community's workload and to facilitate the Chairs' earlier involvement in the budget and planning process. If the SOs, ACs, and the community can identify priority projects and activities each year, this exercise will help ICANN org better allocate (or acquire) staff and resources to support the work. This suggestion is one that ICANN org can take up with the SO and AC Chairs as part of the org's community engagement on prioritization and planning.

2.7.5 Develop Internal and External Ethics Policies

The ccNSO SOPC had several comments on this Operating Initiative. One comment stated that an equivalent to the Ethics Policy for the community already exists (for example the Expected Standards of Behavior). One comment noted that there is a need to define more specifically what kind of policy ICANN org is going to develop. In response, ICANN recognizes that the Expected Standards of Behavior, the org and Board conflicts of interest policies, and other documents constitute a part of, but not a complete, a total ethics policy. An ethics policy defines how people within an organization or community might interact with one another, and also how they carry out their responsibilities in an ethical manner. Essentially an ethics policy should include general principles and guidelines of how org and community members should act within a complete ethical framework.

The ccNSO SOPC also commented that efforts to establish the perfect Ethics Policy may lapse into endless discussion. Given this, the ccNSO SOPC suggested that the word development is vague in the absence of a clear objective and scope. In response, ICANN recognizes that like with all improvements at ICANN, an overall ethical approach should be an ever-evolving activity. The objective is not to create a "perfect" set of policies but a set of policies that will continue to improve and change as the ICANN community and org does.

The RySG asked if one of these ethics policies would specifically cover the Board. As stated above, there are already policies relating to ethics both from law and from ICANN processes that apply to the ICANN Board. Examples include the Conflicts of Interest Policy, the Board Code of Conduct, and Expected Standards of Behavior. Considerations of any ethics policy will also relate to the Board as well as the org and the community.

The RySG asked whether this ethics work would be completed early in the five-year cycle or developed at any point along the five-year period. It is anticipated that this work will be completed with due consultation with the Board and community in the first few years of the five-year period.

In regard to the description of a future step to launch an internal Ethics Page and Ethics Dashboard on the ICANN org Intranet, feedback on ease of navigation was received. ICANN org appreciates the community's input; these comments have been noted and will be taken into consideration as work progresses on development of the ethics policy.

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

The New gTLD Program is a part of operating initiatives that focus on evolving the unique identifier system and promoting and sustaining a competitive environment. The program and its continuation are one way of allowing for continued innovation and opportunities in the market, particularly with regard to internationalized domain names. The program is a part of supporting and promoting the competitive environment, i.e., making it open for new entrants in different regions of the world. The program enables a competitive environment by opening rather than closing off potential additions to the gTLD namespace.

There is a need for cross-functional collaboration, and the functions mentioned in the Draft FY22–26 Operating and Financial Plan (on page 36) are relevant to providing support for the

Board to cover these important areas. In reference to guiding the Board through evaluation, please note that the Board is not expected to perform evaluation of applications.

In regard to planning future rounds, ICANN org notes that budgeting associated with the New gTLD Program is handled in a separate track. Transparency of, and rationale for, decisions will be part of any Board resolution regarding the allocation of funds.

The New gTLD Program budgeting is handled separately from the organizational budget. However, the org will consider the comment about setting aside resources raised from the previous subsequent rounds of new gTLDs.

2.7.7 Universal Acceptance

ICANN org's Universal Acceptance (UA) Operating Initiative is in place to ensure that Internet applications and systems consistently treat all TLDs in all scripts, and email addresses based on those domains. UA promotes consumer choice and provides broader access to end users. The title of this Operating Initiative has been renamed to "Promote the Universal Acceptance of Domain Names and Email Addresses." ICANN org agrees on the significance of UA and continues to focus on addressing UA readiness actively and through the support it provides to community-based initiatives, including the UASG.

ICANN org agrees that UA is very relevant for the ccTLD community, especially the IDN ccTLDs that are directly impacted by the lack of UA readiness. ICANN org is working on multiple fronts in this context. ICANN continues to support local initiatives in various geographies through the Universal Acceptance Steering Group (UASG), many of which directly involve the local IDN ccTLDs (including China, Commonwealth of Independent States and Eastern Europe and Thailand).

ICANN org is also reaching out to regional ccTLD organizations to hold training programs for the ccTLD community as well as other relevant stakeholders, including their registrars and relevant policymakers. The program, in collaboration with the [Asia Pacific Top Level Domain Association](#) (APTLD) is underway and the calendar of interactions is published.

ICANN org's Global Stakeholders Engagement (GSE) team is also involved in raising awareness on and promoting UA and IDN implementation at national and regional platforms. ICANN org supports the GAC's IDN and UA Working Group which focuses on raising awareness of policymakers within the ICANN community.

ICANN org will reach out to the UASG's Communications WG to see if it is feasible to publish a more comprehensive calendar of outreach activities at the UASG.tec website.

ICANN org has identified gTLD registries and accredited registrars as relevant stakeholders and is working toward reaching out to promote UA readiness. This is covered in the statement: "Develop messaging and undertake communication to reach out to technical and other stakeholders to promote UA readiness in applications" on pg. 72 of the Draft FY22—26 Operating and Financial Plan. This statement will be updated to explicitly mention the gTLD registries and registrars.

ICANN org is working with its vendors to make its relevant systems UA ready, which also includes vendor training on UA matters. ICANN org is working with its email vendors to make the mailing system UA ready, but it is dependent on the vendors providing support, which may take at least another six months. ICANN org also intends to reach out to the meeting software providers to see if they can include UA readiness in their roadmap.

ICANN published a case study that updates the community on the progress and next steps, available at https://uasg.tech/wp-content/uploads/2020/03/UASG_ICANN_Case_Study_UASG013C.2.pdf. ICANN also updates the community on the progress during UA outreach sessions during ICANN Public meetings and will continue to do so in the future. This will be added in the scope of UA, as suggested.

There are many learning resources already published and being used for the training of stakeholders (e.g. see <https://community.icann.org/display/TUA/UA-Draft+Training+Materials+and+Reports>). More training resources are being developed, including for the ICANN Learn platform. Additional training materials can be developed based on community needs.

Email Address Internationalization (EAI) is included, but is implicit in the broader use of the term Universal Acceptance. This is also evident in the scope, which states "Raise awareness and capacity of email tools and service providers to support internationalized email addresses."

The How Progress is Tracked section covers items being tracked at a high level. Detailed annual tracking of the UA work is conducted and published through the annual reports by UASG. For example, see the Annual Report on Universal Acceptance for FY20 published at <https://uasg.tech/wp-content/uploads/2020/09/UASG-FY20-Readiness-Report-20200917.pdf>, which contains the detailed metrics and statistics for UA readiness. This practice will continue to concretely document the state of practice of Universal Acceptance.

With regards to UA technology remediation, it includes a growing list (as prioritized by UASG), with programming languages and frameworks, email tools and services, content management systems, browsers, etc. The Operating Initiative is being updated to include some such examples.

The budget is an estimate based on the actual spending on Universal Acceptance over the past few years.

2.7.8 Root Zone Management Evolution

This Operating Initiative continues the advancement of the technology platform used to provide root zone management services, rather than the day-to-day core activities of the IANA function, which is described under its Functional Activity. The deliverable of this Operating Initiative includes a significant new version of the Root Zone Management System with redesigned backend. Other ongoing enhancements included implementation of approved policy recommendations on IDNs and New gTLD Subsequent Procedures.

As it relates to ICANN org's consideration of user-management improvements to allow authorization of more parties as TLD managers, the org's evaluation and implementation of alternative access features proceed cautiously and, by default, will not change the security model of any TLDs unless they expressly opt-in to changes.

Retaining the skilled IANA staff is a key priority for ongoing success of this Operating Initiative.

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

The ccNSO SOPC commented that this Operating Initiative's objectives are unclear and insufficiently specified. The comment also stated that specific metrics should be used to track objectives. The Operating Initiative does include two deliverables: completion of the two planned assessments and creation of a plan to address engagement gaps. ICANN org continually seeks to improve the quality and content of the planning documents and will continue to evaluate additional metrics for future planning cycles.

The RySG commented that an effective GAC is crucial for an effective multistakeholder model and that they appreciate ICANN's work to continue to improve transparency around its engagement with governments, intergovernmental organizations and forums. ICANN org appreciates the RySG's support of the work being done to improve transparency around ICANN's government and IGO engagement activities. ICANN org will provide reporting on new initiatives, such as the GE publications, as they develop, and continue reporting on GAC outreach, technical briefings, and capacity development sessions.

The BC supported ICANN's fostering of successful and mutually beneficial relationships with local, regional, and global partners to ensure knowledge building about its Mission. The BC also notes that ICANN is engaged, its role acknowledged, and its presence valued in the arenas where relevant topics are discussed. The BC also supports that ICANN plays an important role in raising awareness among legislators, regulators, and stakeholders about its Mission and the effect of various regulatory and other proposals on the Internet ecosystem.

The BC noted the political sensitivities to reducing some participation that the community relies on and asked about the extent of study done in a bid to mitigate issues arising. ICANN org has reassigned certain engagement activity to other functions to allow the government and IGO engagement function to focus on governments rather than more broadly defined dialogs about governance.

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

Regarding the allocation of adequate resources to sufficiently monitor global dialogue and alignment with the Strategic Plan, the Government and Intergovernmental Organization Engagement Functional Activity's budget includes financial support for the GAC capacity building and the technical briefings that GE conducts through government engagement. This Operative Initiative does not use additional resources beyond that budgeted for the function. The financials for operating initiatives on page 182 of the plans are estimates for initiatives that require additional third-party resources. Please also refer to section 2.6 for more details regarding Operating Initiative Resources.

ICANN org continually seeks to improve the effectiveness of the multistakeholder model and its ability to balance the concerns of all involved, including governments and IGOs.

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

The BC and GAC noted support for this Operating Initiative. ICANN org works cross-functionally with several functional activities providing support such as the Office of the Chief Technology, Government and Intergovernmental Engagement, Global Communications and Language Services, and Governance Support.

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

ICANN org will explore options for both internal and external systems as it formalizes its funding model. The org plans to evaluate the migration of the forecast model to a platform that will provide a robust system for preparing and analyzing future funding projections.

ICANN org appreciates the comment that ICANN transparently shows the progress achieved thus far, including the allocation of personnel and resources. One of the targeted outcomes of the Planning at ICANN Operating Initiative is to design and implement a progress and achievements reporting process. The community will be consulted on progress reporting and measurement of achievement. Please also review section 2.9 of this report for additional information about progress measurement and reporting.

2.7.13 Implement New gTLD Auction Proceeds Recommendations As Approved by Board

Regarding the Board-approved recommendations arising from the Cross-Community Working Group on New gTLD Auction Proceeds (CCWG-AP), implementation would be funded from the Auction proceeds. There would be no shock to the operations of ICANN, as its core budget would not be impacted.

The premise that New gTLD Auction Proceeds implementation costs will be borne from those proceeds is correct, as has been clear since the outset of this work. It is important, however, to recognize that this work comes with important operational considerations for ICANN org, and this includes inputs in the form of expertise, time and effort from across the org. Community contributions of time, expertise and participation are equally as important and another element to consider as part of the overall level of effort.

2.7.14 Planning at ICANN

The BC made several comments regarding the resources involved over the five-year plan period and external resources needed to help with facilitation skills, and facilitation at the beginning of the period. To respond, the number of ICANN org resources involved in this Operating Initiative over the five-year plan period are expected to increase as compared to the previous five-year plan period. At the beginning of the period, limited external resources will be needed to help with process improvements in the Planning project and project management for these improvements. These external resources will complement the skills of the Planning department as best practices in Planning are implemented. The Planning at ICANN Operating Initiative strives to improve the quantification of resources, evaluation of needs, prioritization, flexibility, and transparency of the ICANN's resource and activity management. An essential element of this initiative's success is effective cross-functional collaboration. In addition, planning involves all stakeholders of the ICANN ecosystem, including the ICANN Board,

community, org, and the public. Please also see section 2.6 of this report for more information about Operating Initiative Resources.

The BC noted that newer community members need time to learn ICANN’s planning process and may not fully engage in Public Comment proceedings. ICANN org will need to provide information and engagement opportunities to ensure that the Bylaws-mandated reviews and Empowered Community timelines are achievable. ICANN org will continue to provide engagement materials during each planning cycle and at ICANN Public meetings. ICANN org acknowledges that newcomers may find the documents too long. The org continues to improve the Operating Plan and Budget documents to provide clarity, while being concise with high-level explanations. Please also see the suggestions for future improvements in section 2.1.2 of this report.

ICANN org appreciates the BC’s comments stating that “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.” The BC also notes its observation that within some Working Groups (WG), a false sense of consensus or lack thereof can be unduly created through stalling tactics and by consuming working calls with parallel or trivial debates, discouraging the participation of more goal-oriented volunteers. The BC goes on to write that leaders of WGs should have the power to 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 obstructionism. Recent initiatives such as PDP3.0 and the Consensus Playbook development have allowed ICANN org and the community to better understand the challenges of consensus-building as the multistakeholder model evolves and as the community grows. Consensus is not always defined or used uniformly across the various community structures, which might add to potential confusion and misunderstandings. ICANN org will be pleased to support and facilitate the community’s continued efforts to improve how consensus is defined and understood, including providing the community with clear information and assistance as to existing processes and definitions.

One of the milestones in this operating initiative is the Prioritization of ICANN’s work project, during which ICANN org will engage with the ICANN community and the Board as it continues to research and develop a prioritization framework and related processes.

2.7.15 Reserved Fund

The goal of the Reserve Fund Operating Initiative is to ensure the Reserve Fund has at least 12 months of operating expenses according to that fiscal year’s budget. Contributions to the Reserve Fund will first ensure that this minimum target is met, then an additional amount may be allocated to provide ICANN org with even more financial security. In the five-year Financial Projections of the FY22—26 Operating and Financial Plan, ICANN org clearly shows which contributions go toward this minimum target and, when applicable, which contributions are supplemental.

For additional information on the Reserve Fund’s financial management, please see section [2.2.6 Funds Under Management](#) of this report.

2.8 Personnel and Headcount

ICANN org’s headcount remains stable and consistent with previous years, anticipating approximately 405 personnel by 30 June 2022. ICANN org’s careful management of resources

has kept headcount stable and often 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.

The ccNSO SOPC's commented that a repetitive assumption that 'Personnel may leave if initiatives offering career progression are not implemented because of lack of information of staff promotion practices' appears too challenging to suggest any credible strategy unless it is an elegant euphemism for a pay rise. ICANN org recognizes several Functional Activities indicate the risk of staff turnover in the considerations section of the Operating Plan. In addition to ICANN org's recently implemented improvements to the performance management and review system, conducting annual reviews of staff compensation (ACMR process) to ensure market competitiveness, and varied learning and development offerings, this typical risk will be further mitigated through a project to deliver structured career path options and clarify criteria for progression. Having a clearly defined and understood career path for staff will support the need to maintain knowledge of ICANN as well.

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

The Draft FY22 Budget does not include any headcount or costs for the next round of gTLDs. The next round of gTLDs will be a self-funded program similar to the 2012 round. A self-funded program means that collected application fees will cover the costs for this program. This will not be funded through the ICANN Budget. There is ongoing work with the Board, community, and organization to better define this program. With Board approval of the policy recommendations resulting from the New gTLD Subsequent Procedures Policy Development Process (SubPro), ICANN org will begin resourcing for this program.

2.9 Progress Measurement and Reporting

Tracking and reporting on progress toward achievement of the Operating Plan and Strategic Plan is important. ICANN org received several comments and suggestions regarding this theme, from various community groups, including the ALAC, ccNSO SOPC, and RySG.

Progress measurement varies depending on the nature of the activities. For example, progress can be measured by a completion of deliverables (outcomes), such as the planning team's delivery of ICANN's Five-Year Operating and Financial Plan and One-Year Operating Plan and Budget, which are required by the Bylaws. Progress can also be measured by performance, such as the number of meetings supported by the Meetings Operation team. Currently, ICANN org reports performance via the President and CEO reports and ICANN's Annual Report, which are published on icann.org.

ICANN org appreciates the suggestion for a regular progress report to stakeholders including a report on community contributions. ICANN org acknowledges and appreciates that the recommended reporting could be similar to the five-year rolling community-led roadmap included in the Appendix A of the Draft Operating and Financial Plans. ICANN org also appreciates ALAC's suggestion particularly related to progress measurement and reporting of the evolution of the multistakeholder model. ICANN organization and the ICANN Board

understand the nature of the effort, as well as the complexities involved in implementing the work areas identified for evolving the ICANN's multistakeholder model, and will continue to work with the community to carry out the activities needed to achieve the intended objectives.

ICANN org will continue to evaluate if its milestones reasonably measure progress toward achievement of the plans in the future cycle. A targeted outcome of the Planning at ICANN Operating Initiative is the design and implementation of a progress and achievements reporting process, which will include consultations with the community, progress reporting, and measurement of achievements. The “How Progress is Tracked” sections of the plan will continue to be refined and more metrics-driven in future documents.

3. Appendix – Contributor Questions/Comments Received and Reference to Response

This report’s Appendix lists all comments along with a reference to a corresponding ICANN response. The Appendix contains one table showing comments received by the public comment deadline and another for comments received after the deadline expired. For comments received by the due date, ICANN org has listed the reference to a specific response to the public comment received. The two submissions received after the deadline are listed in the second table for transparency. From these late submissions, we identified six comments which are listed separately in the Appendix. ICANN org did not directly respond to these questions, but does include a reference to where a similar question from another submission is answered.

3.1 Public Comments Received

Submitter Organization/ Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
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At-Large Advisory Committee	Of utmost importance, the ALAC wishes to express our concern regarding the allocation of staff resources needed to support the full implementation of the At-Large Review Implementation. As noted in the At-Large Review Implementation Final Report, which was accepted by the ICANN Board on 10 September 2020, Issue 2 on Member Engagement and Criteria focuses on mobilizing members of At-Large Structures (ALSes) and individuals to engage more fully in policy development activities as well as to meet new criteria, expectations and reporting requirements. Recognizing that these activities would require additional support, a request for additional staff support was included in Issue 3 of the At-Large Review Implementation Final Report. We were provided with a very productive part time support resource for several months. However, given that the new requirements are now ready to be implemented, we believe that at least a partial full-time staff support resource is required on a permanent basis. This staff resource would be responsible, in part, to manage the growing number of ALSes (currently 250, plus 143 individuals and 20 Observers), including keeping track of the members, monitoring that they meet the reporting criteria, engaging with them as needed, and ensuring they receive the information required to fully engage in the At-Large policy development activities according to the new expectations.	See section 2.3.9 Policy Development and Advice
At-Large Advisory Committee	This is a budget document, which naturally involves a great deal of counting. But the document goes well beyond the numbers. It offers both ICANN's financial and operating plan - complete with strategic goals, targeted outcomes and progress tracking. We realize that data (i.e. numbers) need to be collected in the process of evaluating the progress of various initiatives described in this document, but the work should not stop there. There is not enough emphasis placed on qualitative data collection in the tracking of progress. There should be an effort made to take deeper dives into the meaning of the data collected. The numbers alone only tell part of the story; they are only one way of understanding progress, or lack thereof.	See section 2.9 Progress Measurement and Reporting
At-Large Advisory Committee	We feel the amount dedicated to Operating Initiatives is low, only 24.5 million USD in 5 years, especially if those are the initiatives in place to fulfill the Strategic plan FY21-25. We understand that some other items within the Operating Initiatives are included in the core budget under different heading, and this needs to be clarified as these initiatives are ICANN org's top priorities.	See section 2.6 Operating Initiatives Resources
At-Large Advisory Committee	The current Budget illustrates a trend of less contracted parties every year, but then we see an increase in transactions. If there is indeed a decrease in the number of contracted parties, this should result in lower yearly fees to ICANN, but the budget is showing no impact in the funding which is expected to grow each year.	See section 2.4.2 Assumptions

At-Large Advisory Committee	In addition, the cancellation of several events due to the global pandemic means that significant costs were not incurred this year. Since funds cannot be carried over from one year to the next, we seek clarification on what happens to these surplus funds. Do they go to the reserve fund? Do they go to other items in the strategic plan? We understand that the Board makes this determination, but it would be helpful if this would be clarified	See section 2.2.6 Reserve Fund
At-Large Advisory Committee	For 2-3 years headcount has been at 405, but the actual totals have been steady at 390-395, which creates a "save" in costs at the end. The question is, will ICANN really increase to 405 in FY22 and 410 from FY23 to FY26?	See section 2.8 Personnel and Headcount
At-Large Advisory Committee	For the first ICANN Meeting there appears to be no provision for COVID-19 tests, nor in the second stage of the ICANN Meeting strategy with regional hubs.	See section 2.5.1 ICANN Meetings
At-Large Advisory Committee	The ALAC also has concerns about the future cost of travel once we go back to in-person (F2F) meetings, as airlines around the world are struggling with debt. Currently, airlines have canceled or stopped operating many routes and have also reduced the connections to other countries. It is unclear when these routes will be reinstated and at what cost. We can also assume there will be additional layovers due to reduced connections, among other impacts. As such, it is prudent that ICANN allocate more money to the travel budget to cover the likely increase in costs of travel to these meeting locations.	See section 2.5.1 ICANN Meetings
At-Large Advisory Committee	Cost Savings - This item is a "new" line item, but there is no breakdown of what it contains, making it difficult to understand what it covers. For example, how much is forecasted to be expended in the breakdown?	See section 2.2.2 Expense Details
At-Large Advisory Committee	According to the Finance team, the extra financing of the reserve fund will be complete by the end of FY21. It is not clear what the Finance strategy for contributing to the reserves will be, and so we are seeking clarity on this. From a Finance perspective, the amount of the allocation to the reserve fund should be the delta increase between one fiscal year and the next, in order to comply with the Board mandate to have a reserve fund equivalent to at least one-year operational budget. This is valid not only for FY22, but from FY23-FY26. Allocations shown do not seem to follow this rule.	See section 2.2.6 Reserve Fund
At-Large Advisory Committee	The EURALO General Assembly is currently scheduled to take place face-to-face in FY21 during the EuroDIG meeting scheduled for 28-30 June 2021. However, with the continuing spread of COVID-19 throughout Europe, there is uncertainty on when face-to-face meetings will be able to be held safely. With this in mind, the ALAC Chair, Maureen Hilyard, and EURALO Chair, Sebastien Bachollet, have requested that ICANN org and the ICANN Board, include funding for a rescheduled face-to-face EURALO General Assembly in the FY22 Operating Plan and Budget, in the event that the FY21 EURALO General Assembly is unable to take place in person.	See section 2.5.2 Constituent Travel and Additional Budget Request (ABR)

<p>At-Large Advisory Committee</p>	<p>Additionally, if the EURALO General Assembly will be rescheduled to FY22, EURALO also asks that the approved FY21 Additional Budget Request (FY21-33) for Training at the FY21 EURALO General Assembly consisting of partial approval for one (1) additional hotel night and applicable per diem for EURALO travelers already funded to the General Assembly also be included in the General Assembly budget.</p>	<p>See section 2.5.2 Constituent Travel and Additional Budget Request (ABR)</p>
<p>At-Large Advisory Committee</p>	<p>Also, we wish to inform you that the At-Large community has developed a new 5-year cycle of At-Large Summits and RALO General Assemblies. This new 5-year plan follows on from the previous 5 year At-Large roadmap noted in the FY18 Five Year Operating Plan Update. which the Board approved. Following the Third At-Large Summit in 2019, each RALO has scheduled a General Assembly over the next four years. We ask that ICANN org take the appropriate actions to ensure adequate funding for these events.</p>	<p>See section 2.5.2 Constituent Travel and Additional Budget Request (ABR)</p>
<p>At-Large Advisory Committee</p>	<p>The ALAC acknowledges the ongoing work developing approaches and solutions towards improving ICANN's multistakeholder model - especially around prioritization of work, efficient use of resources, and precision in scoping the work. We appreciate the particular focus in this draft budget on facilitating diverse and inclusive participation - one of the key issues identified by the community as urgently in need of attention.</p>	<p>See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking</p>
<p>At-Large Advisory Committee</p>	<p>On Reporting We begin our comments here at a more general level. As was already pointed out by the ATRT3 team, there is no single tool or reporting mechanism which keeps all stakeholders informed about progress on the full set of issues identified during community discussions. There is no single source of information showing progress on initiatives and there is no overall strategy to recognize efforts, especially community-led efforts. For example, the EURALO-led European Roundtable at the ICANN69 and at their monthly meetings is an excellent example of a community-wide activity - but there is no place to recognize this as a contribution toward resolving the MSM issues, particularly around silos and trust.</p> <p>To address this gap, we suggest a regular inclusive (i.e. all issues) progress report to stakeholders including a call-out to the community for contributions. A tool similar to the five year rolling community-led roadmap attached in Appendix A on policy, reviews and cross-community working groups (p.344-345 of the draft budget) could also be considered.</p>	<p>See section 2.9 Progress Measurement and Reporting</p>

<p>At-Large Advisory Committee</p>	<p>On Evaluation In the October 2020 report, “Enhancing the Effectiveness of ICANN’s Multistakeholder Model”, the ICANN Board proposed that an ongoing evaluation method be connected to the strategic objective regarding the effectiveness of ICANN’s multistakeholder model of governance:</p> <p>“ The evaluation method used can be both objective and subjective. From an objective perspective, the evaluation method can be used to track and review progress of the actions being implemented, including those that are community driven. Further, the evaluation method used can also include more subjective metrics such as whether consensus is better understood because of new tools, such as PDP 3.0, and thus are more achievable. ”</p> <p>The ALAC believes that, in meeting the strategic goals and targeted outcomes listed on p.27 and p.194 of this document, progress should be evaluated in a holistic manner - i.e., including both qualitative and quantitative measures. Total reliance on objective methods would stunt our understanding of progress on various levels. We suggest that there should be rolling goals with targets at the end of the five year period and a recognition that flexibility is essential over that time. As we have seen with the pandemic, unexpected events can quickly require a shift in focus.</p>	<p>See section 2.9 Progress Measurement and Reporting</p>
<p>At-Large Advisory Committee</p>	<p>Tracking progress As suggested at the beginning of this ALAC statement, there needs to be more space created for qualitative data collection in the evaluation of strategic initiatives. This could be in the form of facilitated focus groups (these could be virtual) designed to take deeper dives into the meaning of the data collected through surveys, etc. For example, any current statistics on participation and diversity will be colored, for better or worse, by the impact of the pandemic. The numbers alone only tell part of the story.</p> <p>A report documenting progress on the targeted outcomes listed in this draft budget should be issued regularly.</p>	<p>See section 2.9 Progress Measurement and Reporting</p>
<p>At-Large Advisory Committee</p>	<p>Resources and proposed activities for FY22 Where the one-year operating plan suggests formalizing support for collaborative work by community leaders across the SOs and ACs and with ICANN org (p.195), we hope this could be expanded to include facilitated discussions and community-led focus groups including analyses and reporting of results of discussions on the evolution of the multistakeholder model. We reiterate that the collection of statistics is only one way of understanding progress, or lack thereof, on the issues.</p>	<p>See section 2.9 Progress Measurement and Reporting</p>

At-Large Advisory Committee	<p>The ALAC requests that ICANN Planning and Finance teams be mindful of accessibility issues when posting documents. After reading the reports, we noticed several of the tables contained in the PDF documents were not posted as actual tables, but as images. When tables are posted as images people who are blind or have low vision and who use screen readers cannot read these documents. ICANN should ensure that they follow the Web Accessibility Guidelines established by the World Wide Web Consortium (W3C) and the Web Content Accessibility Guidelines, WCAG 2.0 or later. Many of the figures and tables used in the document do not contain ALT text describing the table or figures. Besides these issues there are a number of other accessibility problems with the reports such as: Poor Color Contrast, lack of any Accessible Bookmarks, Headers, Tab Order, Logical Reading Order, Document Language and Titles.</p> <p>All these three items have simple fixes but need to be taken into account when creating the PDF, Word or Excel Document. In fact, many of these can be fixed automatically or done manually with little effort. An At-Large member will post a separate, more detailed comment on these accessibility issues, but we also want to highlight these issues in this ALAC statement.</p>	See section 2.1.2 Future Improvement Suggestions.
ccNSO Strategic and Operational Planning Committee (SOPC)	The length of the document. We compliment ICANN for the effort of further structuring the texts. At the same time, we cannot help from highlighting that it is challenging to examine in detail 359 pages, even for mother tongue readers. We would recommend ICANN to be more concise, less repetitive, and perhaps indicate changes from year-to-year in some manner. As a matter of fact, it is hard to distinguish truly important conceptual things from excessive minor/irrelevant details.	See section 2.1.1 Document Details and Length
ccNSO Strategic and Operational Planning Committee (SOPC)	While the draft ICANN Operating & Financial Plans for FY22-26 (Five-Year Plan) provides five-year financial estimation for each Operating initiative (including Low, Mid-point & High scenario), the Draft ICANN Operating & Financial Plans for FY22 (One-Year Plan or FY22 Plan) does not include this information. It would be helpful if each Operating initiative could be directly linked with the respective budget figures in the FY22 budget as well as in Five-Year budget.	See section 2.6.2 Operating Initiatives Resources
ccNSO Strategic and Operational Planning Committee (SOPC)	The FY22 Draft Budget includes only the total figure: namely, Incremental Operating Initiatives worth a total of 5 500 000 USD. The amount itself looks reasonable as it is approximately one-fifth of five-year mid-point amount budgeted for all Operational initiatives (24 500 000 USD). However, clarification on why no detailed figures per initiative are provided and how ICANN plans to split this amount between operational initiatives would be desirable.	See section 2.6.2 Operating Initiatives Resources

ccNSO Strategic and Operational Planning Committee (SOPC)	The Highlights of the draft FY22-26 Operating and Financial Plan and FY22 Operating Plan and Budget document ('Highlights Doc') provides a table (page 4) with a five-year financial estimate and also per each Operation Initiative. The five-year Plan includes only figures of estimated expenses (in the Resource Section for each Operating Initiative). It would be useful to add additional details to explain the nature of the expenses.	See section 2.6.2 Operating Initiatives Resources
ccNSO Strategic and Operational Planning Committee (SOPC)	During the Community Webinar on Draft FY22 Operating & Financial Plans it was mentioned (slide 16-17) that FY22 Plan provides Key Milestones per initiative. Examples of milestones presented on the slide for some initiatives are real milestones (i.e. 'Complete a rewrite of the Root Zone Management System'), but for the others they are processes without concrete deliverables, rather than milestones (i.e. 'Continue development of ICANN org ethics policies').	See section 2.9 Progress Measurement and Reporting
ccNSO Strategic and Operational Planning Committee (SOPC)	Operating Initiative 1 and 2 - Support the Evolution of the Root Server System and Facilitate DNS Ecosystem Improvements: The 'resources' section speaks mostly to the importance of effective cross-functional collaboration. In addition to a description of collaboration required, it would be beneficial to have an explanation of specific resources (employees, funds) allocated to support this initiative.	See section 2.6.2 Operating Initiatives Resources
ccNSO Strategic and Operational Planning Committee (SOPC)	Operating Initiative 1 and 2 - Support the Evolution of the Root Server System and Facilitate DNS Ecosystem Improvements: Additional information on Financial Assumptions to explain expenses is desirable (i.e. 'headcount of 2 for the 5-year period and funds for third party consulting expense for meeting facilitation and research' as mentioned in 'Highlights of the Draft FY22-26 Operating and Financial Plan and FY22 Operating Plan and Budget' document).	See section 2.6.2 Operating Initiatives Resources
ccNSO Strategic and Operational Planning Committee (SOPC)	The following seems unrelated to Resources: 'Activities support ICANN's efforts to preserve and enhance the security, stability, and resiliency of the DNS including Root Server System governance, mitigation of DNS security threats, promotion and/or facilitation of DNSSEC deployment, the mitigation of name collisions, and DNS operations research.'	See section 2.6.2 Operating Initiatives Resources
ccNSO Strategic and Operational Planning Committee (SOPC)	It is helpful that the five-year plan for FY22-26 estimates Low-Mid-High point scenarios. However, it does not explain how funds will be allocated. It would be beneficial to include similar Low-Mid-High point scenarios for FY22, specifying an allocation of funds budgeted per initiative. It is important to ensure that recommendations from previous reports have been implemented, such as developing and undertaking training for technology developers, and email tools for service providers to promote Internationalized Domain Names readiness (as on page 194) is a much-needed activity.	See section 2.6.2 Operating Initiatives Resources

ccNSO Strategic and Operational Planning Committee (SOPC)	We fail to find metrics to measure the increase of knowledge and skill levels across the stakeholder community and organisation. Close collaboration with ROs can increase local presence while increasing the number of capacity development and training events to regional stakeholders; however, the report does not make a mention of this.	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking See section 2.9 Progress Measurement and Reporting
ccNSO Strategic and Operational Planning Committee (SOPC)	ICANN org Language Services, Meetings, and Engineering and IT functions align well with the scope, strategic goals, and targeted outcomes. Nevertheless, the FY22 does not define the funds budgeted for this initiative.	See section 2.6.2 Operating Initiatives Resources
ccNSO Strategic and Operational Planning Committee (SOPC)	The five-year Plan identifies a lack of sufficient personnel to provide support to existing and future policy development and advisory work (see page 31). Recommendations regarding the need of personnel to support additional or future PDPs are not provided. Therefore, it is recommended that we promote and initiate discussions about costs and benefits to address this issue.	See section 2.7.4 Evolve and Strengthen the ICANN Community's Decision-making Processes to Ensure Efficient and Effective Policymaking
ccNSO Strategic and Operational Planning Committee (SOPC)	The one-year Operating Plan considers that community participants need to develop data analysis and related skills. However, it does not make recommendations for the amount to be budgeted to fund that initiative.	See section 2.7.4 Evolve and Strengthen the ICANN Community's Decision-making Processes to Ensure Efficient and Effective Policymaking
ccNSO Strategic and Operational Planning Committee (SOPC)	Indicator metrics seem to be in place, but milestones are not clearly defined, and thus left to each SO/AC to determine.	See section 2.9 Progress Measurement and Reporting
ccNSO Strategic and Operational Planning Committee (SOPC)	We feel that an equivalent to the Ethics Policy for the community already exists (for example 'Expected Standards of Behavior'). Given this, there is a need to define more specifically what kind of 'policy' ICANN org is going to develop.	See section 2.7.5 Develop Internal and External Ethics Policies

ccNSO Strategic and Operational Planning Committee (SOPC)	The efforts to establish the perfect Ethics Policy may lapse into endless discussion. Given this, 'development' is vague in the absence of clear objective and scope.	See section 2.7.5 Develop Internal and External Ethics Policies
ccNSO Strategic and Operational Planning Committee (SOPC)	As already commented, we fail to see the link between the next application window/the new gTLD Program and the evolution of the unique identifier systems or competitive environment.	See section 2.7.6 Promote and Sustain a Competitive Environment in the Domain Name System
ccNSO Strategic and Operational Planning Committee (SOPC)	This initiative is highly relevant for ccTLDs. We believe that ICANN should not only support local initiatives of community-based working groups, but proactively engage with both developers and decision makers to promote Universal Acceptance and IDN implementation. If ICANN develops and makes publicly available the detailed plan of UA-related activities for FY22, it would help local communities to coordinate their efforts with ICANN's ones.	See section 2.7.7 Universal Acceptance
ccNSO Strategic and Operational Planning Committee (SOPC)	Furthermore, we fail to see any mention of TLD registries and accredited registrars engagement into the UA processes although these entities are one of the main interested parties in the UA compliance realization.	See section 2.7.7 Universal Acceptance
ccNSO Strategic and Operational Planning Committee (SOPC)	This is a core function of ICANN which should be put on a recurrent operational basis, unless distinct new initiatives could be undertaken to enhance the function. As captured in the document, it only showcases the regular activities that are currently being done. We would like to highlight that this is one of the few operational areas where we can see true metrics that enable the community to track progress.	See section 2.7.8 Root Zone Management Evolution
ccNSO Strategic and Operational Planning Committee (SOPC)	While the intended activities have been outlined, the objectives are not very clear and not sufficiently specified. There is a need to bring up initiatives that would be measurable while at least specifying metrics that would be used to track objectives.	See section 2.7.9 Evaluate, Align, and Facilitate Improved Engagement in the Internet Ecosystem
ccNSO Strategic and Operational Planning Committee (SOPC)	It is helpful that the outcome of 'systems to detect and monitor legislative and regulatory initiatives' will be reported annually. However, we fail to see what type of data will be gathered, how it is measured, the progress compared with previous year, etc.	See section 2.7.11 Monitor Legislation, Regulation, Norms, Principles, and Initiatives in Collaboration With Others That May Impact the ICANN Mission

ccNSO Strategic and Operational Planning Committee (SOPC)	Formalize the ICANN org Funding Model and Improve Understanding of the Long-term Domain Name Market Drivers -We suggest that where a provision of the Plan is the same as, or building upon, a provision from the previous year's Plan, that ICANN indicates (perhaps in a footnote) the progress achieved thus far including the allocation of personnel and resources.	See section 2.7.12 Formalize the ICANN org Funding Model and Improve Understanding of the Long-term Domain Name Market Drivers See section 2.9 Progress Measurement and Reporting
ccNSO Strategic and Operational Planning Committee (SOPC)	We appreciate the commitment, which we view as essential, that ICANN org will engage with the ICANN community and the Board as it works towards researching and developing prioritization efforts in this regard.	See section 2.7.14 Planning at ICANN
ccNSO Strategic and Operational Planning Committee (SOPC)	Goals, metrics and outcomes across most subsections under Functional Activities are put too broadly – rarely does a given department's team cite specific steps broken down by year. From this perspective, Review Support and Implementation, Global Services Center, Board's Operations and (partly) HR should be commended for sharing a breakdown of specific steps for at least two years, and the Board Operation also, for clearly established and quantifiable KPIs.	See section 2.9 Progress Measurement and Reporting
ccNSO Strategic and Operational Planning Committee (SOPC)	The practice of including all activities, along with even minor and very obvious ones, without identifying 'core' activities as opposed to 'secondary' activities, reduces the value of the document as it does not allow the reader to focus on truly substantial aspects. Besides, it implies a deliberate effort to increase the volume of the text to make the document appear more impressive.	See section 2.1.1 Document Details and Length
ccNSO Strategic and Operational Planning Committee (SOPC)	Likewise, blending Goals and Outcomes does not seem to be a productive move. By definition, the former means 'the end toward which effort is directed' while the latter is 'something that follows as a result or consequence' – hardly perfect synonyms. We would recommend either merging them into one definitive term, or to classify into two separate sub-sections	See section 2.9 Progress Measurement and Reporting
ccNSO Strategic and Operational Planning Committee (SOPC)	Parameters such as 'Adherence to Bylaws requirements' or 'Considering substantive feedback from the community', 'Board and ICANN org to ensure/ inform etc. focused, useful and implementable recommendations' hardly constitute instruments to track progress.	See section 2.9 Progress Measurement and Reporting

<p>ccNSO Strategic and Operational Planning Committee (SOPC)</p>	<p>Furthermore, ICANN org often refers to a combination of milestones, reports and metrics to track progress on a given matter. Whilst these terms are open to individual interpretation, the cited items in certain cases appear debatable and it is hard to distinguish milestones. Furthermore, while it is understood that some measures are not easily quantifiable, in some cases the wording seems quite extravagant, such as, for example, 'Progress <in a certain functional activity> is measured through a continued progress in <a specific area>'.</p>	<p>See section 2.9 Progress Measurement and Reporting</p>
<p>ccNSO Strategic and Operational Planning Committee (SOPC)</p>	<p>A repetitive assumption that 'Personnel may leave if initiatives offering career progression are not implemented because of lack of information of staff promotion practices' appears too challenging to suggest any credible strategy unless it is an elegant euphemism for a pay rise.</p>	<p>See section 2.8 Personnel and Headcount</p>
<p>ccNSO Strategic and Operational Planning Committee (SOPC)</p>	<p>The 'changes in functional activities' section of the 22-26 plan mentions in several places that (human) resources requirements are expected to increase. However, the financial sector of the plan shows a steady headcount of 410 over the years, unchanged from the 21-25 plan. The cost of professional services in the new plan are higher than in the current one. Can you clarify?</p>	<p>See section 2.8 Personnel and Headcount See section 2.2.5 Professional Services</p>
<p>ccNSO Strategic and Operational Planning Committee (SOPC)</p>	<p>Projected funding for the years 2022-25 is now 1 000 000, 1 500 000, 1 900 000 and 2 200 000 higher respectively; total operating expenses for the years 2022-25 are now 7 700 000, 6 100 000, 7 300 000 and 7 900 000 higher respectively.</p> <p>Consequently, due to expenses increasing more than funding, cumulative excess over the years 2022-25 is now 21 400 000 lower than projected in the 2021-25 plan: from +28 500 000 to +7 100 000.</p> <p>An increase in cost over a period of five years which is more than 21 000 000 higher than the increase in funding could be an indicator that costs are spiralling out of control and will soon be higher than funding.</p> <p>Hence our questions to ICANN org: Can you clarify why? Why this increase is justified? How this alarming trend will be stopped in time?</p>	<p>See section 2.4.3 Projections</p>
<p>ccNSO Strategic and Operational Planning Committee (SOPC)</p>	<p>We fail to find internal and external capacity building activities.</p>	<p>See section 2.3.7 Office of the Chief Technology Officer</p>

ccNSO Strategic and Operational Planning Committee (SOPC)	With reference to 'Maintain a low total cost of operations while building capacity, good engineering practices, and RSS community engagement', we believe that the language could be improved, especially when it says 'maintain a low total cost' which cannot be classified as an 'activity'. The awareness raising/educational component of activities seems to be missing.	See section 2.3.6 ICANN Managed Root Server
ccNSO Strategic and Operational Planning Committee (SOPC)	The task of continued improvement of an environment conducive to contractual parties' performance seems to be missing.	See section 2.3.1 Contractual Compliance
ccNSO Strategic and Operational Planning Committee (SOPC)	There is no reference to the work with ccNSO and GAC to develop consensus recommendations.	See section 2.3.10 Policy Research and Stakeholder Programs
ccNSO Strategic and Operational Planning Committee (SOPC)	We believe that what is listed under 'how progress is tracked' does not constitute metrics and/or performance indicators.	See section 2.3.12 Strategic Initiatives
ccNSO Strategic and Operational Planning Committee (SOPC)	With reference to the ways progress is tracked, we believe that the parameters are fairly weak and do not help anyone to easily assess progress against planning.	See section 2.3.8 Planning at ICANN

<p>ccNSO Strategic and Operational Planning Committee (SOPC)</p>	<p>The text reads as follows: 'The primary purpose of Risk Management is to facilitate the identification and articulation of risks faced by ICANN org so that it may make informed decisions about planning for and managing those risks. Through the established Risk Framework, the function focuses on developing a risk-aware culture which incorporates the risk framework into activities.'</p> <p>We believe that the purpose of any risk management should lie in precluding adverse risks to the ICANN's mission, rather than the ICANN planning process per se.</p> <p>We find the following assumptions confusing, particularly to a non-native speaker: "The Strategic Plan does not create any new risks or challenges in itself for the Risk Management function. The Strategic Risks in the Strategic Plan are included in the work done by the Risk Management function. The existing challenges and dependencies of working with multiple other functions applies to managing any new risks added to the Risk Register from the Strategic Plan. The largest consideration for this functional activity is the team's dependency on other functions and personnel, who may have other priorities. The team must rely on Risk Liaisons to respond and also personnel alerting Risk Management when issues arise." We recommend a review of the text to make it clearer and more accessible</p>	<p>See section 2.3.11 Risk Management</p>
<p>ccNSO Strategic and Operational Planning Committee (SOPC)</p>	<p>Considering the recent past, we wish that additional resources could be available for any region.</p> <p>We wonder why the engagement centers in Nairobi and Geneva are not mentioned. We also fail to see a long-term strategy for ICANN's regional presence with staff and resources moved from one country to another with a lack of continuity.</p>	<p>See section 2.3.3 Global Stakeholder Engagement and Regional Offices</p>
<p>ccNSO Strategic and Operational Planning Committee (SOPC)</p>	<p>Under activities we read the following: 'The team developed the Annual Virtual Global Internet Governance Forum 2020 engagement plan, aiming to coordinate ICANN activities and maximize involvement through speaking engagements, workshops, the Open Forum, social media, virtual booth and flash sessions. The seven-day event occurred in November 2020'.</p> <p>We believe this text belongs in a report on past activities rather than in an Operating Plan.</p>	<p>See section 2.3.5 Government and Intergovernmental Organization Engagement</p>
<p>ccNSO Strategic and Operational Planning Committee (SOPC)</p>	<p>With reference to the additional resources for 'Increased need for professional service contracts to cover specialized events and information gathering', the SOPC has highlighted - on numerous occasions - that ICANN does not fully utilize the community's capacity to gather and process intelligence, which is a major resource that would allow economies of scale.</p>	<p>See section 2.3.5 Government and Intergovernmental Organization Engagement</p>

ccNSO Strategic and Operational Planning Committee (SOPC)	Some of the strategic goals on pages 113-114 are not closely related to Government and Intergovernmental Organization. We would recommend reviewing the goals to make them more focused on the IGO	See section 2.3.5 Government and Intergovernmental Organization Engagement
ccNSO Strategic and Operational Planning Committee (SOPC)	Under 'Operating initiative contributions' we read the following: 'Support: Promote and sustain a competitive environment in the Domain Name System.' However, we fail to find a single reference to promotion of competition in the Strategic Goals and Outcomes and Activities subsections.	See section 2.3.2 GDD Accounts and Services
ccNSO Strategic and Operational Planning Committee (SOPC)	We recommend an in-depth review of the performance metrics to ensure that they reflect proper metrics.	See section 2.9 Progress Measurement and Reporting
ccNSO Strategic and Operational Planning Committee (SOPC)	We recommend that this entire section is reviewed to ensure consistency across its sections. For instance, under activity we find 'Establishment of a contract management database. Currently, contracts are managed within each business unit, which can cause potential legal and financial risk to the organization'. However, there is no reference to this activity in the subsection 'How Progress is Tracked'.	See section 2.3.4 Governance Support
ccNSO Strategic and Operational Planning Committee (SOPC)	The 2 200 000 USD driven by reinstating F2F meetings should be questioned. Why would having F2F meetings cause an increase of the budget? We reiterate our comment that ICANN needs to cut costs, and only travel when absolutely necessary and not because we are 'out of the pandemic'.	See section 2.5.1 ICANN Meetings
ccNSO Strategic and Operational Planning Committee (SOPC)	With reference to the 4 000 000 USD for unknown expenses, we would be grateful to learn more about the procedure for approving expenses that fall under this budget line.	See section 2.2.1 Contingency
ccNSO Strategic and Operational Planning Committee (SOPC)	Overall, we recommend that ICANN cuts back in their strategic objectives and, consequently, in the budget allocated to those proceedings.	See section 2.8 Personnel and Headcount
ccNSO Strategic and Operational Planning Committee (SOPC)	We believe that the five-year budget is sound and balanced. The allocation to the reserve fund has reached a reasonable level	See section 2.2.6 Reserve Fund
ccNSO Strategic and Operational Planning Committee (SOPC)	We fail to find a comprehensive financial breakdown for seven of the 15 operating initiatives. As stated, the seven initiatives are separately funded and therefore no incremental resources are included in the projections. For transparency reasons we recommend including estimates for these as well.	See section 2.6.2 Operating Initiatives Resources

ccNSO Strategic and Operational Planning Committee (SOPC)	We must again express our concerns regarding consultancy costs, as they seem to be higher than industry averages for similar kind of work.	See section 2.2.5 Professional Services
ccNSO Strategic and Operational Planning Committee (SOPC)	We express our concern for the 11 % increase in Professional Services	See section 2.2.5 Professional Services
ccNSO Strategic and Operational Planning Committee (SOPC)	As the ccNSO SOPC has been pushing for increased contingency savings, we are happy to see that this is being implemented.	See section 2.2.1 Contingency
ccNSO Strategic and Operational Planning Committee (SOPC)	We appreciate well-structured and very clear presentations on the funds under ICANN management (Operating, Reserve, ngTLD funds and Auction proceeds). According to the data presented all funds are in a good condition. ccNSO has often stressed out the importance of the Reserve Fund as a pillar of ICANN's financial sustainability. We would like to recognize the significant progress on reaching the target of the Reserve Fund replenishment strategy from 18 November 2020 (12 months of operating expenses). Is there any specific reason that 10 M\$ planned contribution to the reserve fund from net excess generated from FY20 still awaits Board approval?	See section 2.2.6 Reserve Fund
ccNSO Strategic and Operational Planning Committee (SOPC)	As one of the service organizations it is incumbent on the ccNSO to provide input and feedback across the breadth and depth of ICANN's budget, however a special emphasis needs to be placed on the contingency reserve fund as the membership composition of the ccNSO provides a clear and unique mechanism to communicate to the overall health of the internet during exceptional periods. There are projections of well in excess of 10 % of businesses failing as a result of the pandemic globally. Outside of western countries, with massive government intervention, those rates could well exceed the OECD expected average. This would disproportionately impact ccNSO members. What type of impact this would have on domain name renewals and new purchases is an unknown that may trail the end of the pandemic for 24-48 months. Taken to a maximum this is the exact reason for a contingency fund. While it is unknown what percentage of those businesses currently have an online presence, a commensurate drop would have a direct impact on ICANN's revenues for an extended period of time.	See section 2.4.5 Funding to Support Activities
ccNSO Strategic and Operational Planning Committee (SOPC)	Notwithstanding the aforementioned comments, we are happy to see ICANN anticipating that they will continue to replenish the contingency fund.	See section 2.2.6 Reserve Fund

<p>Coordination Center for TLD RU (ccNSO Community)</p>	<p>1. Operating Initiatives (page 14) All bullet points in this section include some actions like - Monitor, Promote, Develop, Evolve, etc. - except Universal Acceptance one. We recommend to better determine and formulate the main scope of work on UA which is planned by ICANN (for example, Development and Realization of Universal Acceptance initiatives).</p>	<p>See section 2.7.7 Universal Acceptance</p>
<p>Coordination Center for TLD RU (ccNSO Community)</p>	<p>2. Universal Acceptance (page 38) Section SCOPE ICANN has been working on the UA implementation on its resources and practices for some time already. But the area doesn't clearly state any options connected with reaching UA Readiness in the ICANN system environment. It could showcase, for example, what there were plans for meeting websites, learning sources, communication tools, etc. improvement.</p> <p>There is also no special mention on any plans for TLD registries and accredited registrars engagement into the UA processes although these entities are one of the main interested parties in the UA compliance realization.</p>	<p>See section 2.7.7 Universal Acceptance</p>
<p>Coordination Center for TLD RU (ccNSO Community)</p>	<p>2. Universal Acceptance (page 38) Section SCOPE This section can also include some planning processes on how to organize the implementation of UA in all domain name registration processes, related protocols, systems, policies, etc. Considering UA as a promotion of consumer choice and for providing broader access to end users, there are also no plans for UA awareness rising among end-user audience reflected here</p>	<p>See section 2.7.7 Universal Acceptance</p>
<p>Coordination Center for TLD RU (ccNSO Community)</p>	<p>2. Universal Acceptance (page 38) Section STRATEGIC GOALS AND TARGETED OUTCOMES SUPPORTED Although EAI implementation can be out of the main scope of ICANN regular work, this issue is well-known as one of the vital for further IDN implementation and promotion, so it could be considered for inclusion as the strategic goal and targeted outcome as well.</p>	<p>See section 2.7.7 Universal Acceptance</p>

<p>Coordination Center for TLD RU (ccNSO Community)</p>	<p>2. Universal Acceptance (page 38) Section HOW PROGRESS IS TRACKED The area states that UA progress will be only documented. In comparison with other ICANN operating initiatives FY22-26 it looks very poor and incomplete. For example, there is no any detailing on how monitor, reports and statistics, planning and preparation, policy implementation, operational readiness initiatives, etc. actions can be tracked.</p> <p>The stated tracking process will cover only training work in two directions and creating public sector awareness. As for the point «The remediation of technology from FY21–24», it doesn't explain clearly what work will be included here. All the mentioned above can help to provide a clearer picture of how UA progress will be tracked.</p>	<p>See section 2.7.7 Universal Acceptance</p>
<p>Coordination Center for TLD RU (ccNSO Community)</p>	<p>As for the Draft FY22 Budget, the main comment and suggestion here is related to how it can be determined for FY22 period if, for example, the community-based working group UASG which is pointed as the resource for realization of UA initiatives and financially supported by ICANN, has not started its Action plan and tentative budget FY22 preparation yet.</p>	<p>See section 2.7.7 Universal Acceptance</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>Last year the GNSO Council questioned 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. For FY22, the GNSO Council notes that Policy Research has been combined with Stakeholder Programs and questions whether 8 FTE an \$1.8M USD is sufficient allocation of funds to support data, research, and study project requests for implementation work for 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 and RPMs PDP (the latter is not reflected, but there also will be the implementation of the multi-year effort of RPMs PDP)</p>	<p>See section 2.3.10 Policy Research and Stakeholder Programs</p>

<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>Maintain adequate staffing for Policy Development Support. See also FY22 Budget Issue 2. In FY22 the level of resources allocated to this Functional Activity indicates 34 FTE and \$7.1M USD. In various sections throughout the FY22 OFP, the document states that “extended operations by the Policy Development Support department’s 35 full-time employee (FTE) level runs the risk of: (i) Lower levels of service to the community and regional disparity; (ii) Delayed policy and advisory outputs; (iii) Community frustration and loss of active participants.; (iv) Potential team member burnout. “The GNSO Council notes that over the next several years the Community will need to be engaged in a growing number of workstreams. Further, some of these work streams are highly technical or divisive and the GNSO Council wants to ensure that there are processes and tools in place and consistently utilized by the Community to reach consensus, resolve impasses, and make timely, informed, and effective decisions that are in the global public interest, take policy advice into account, and ensure consistency with ICANN’s Mission and Bylaws. As such, the GNSO Council recommends that additional budget, number of FTEs, or outside contractors are placed into the FY22 OFP for the next five years.</p>	<p>See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>Strategic Priority should be given to collaboration between the GNSO Council, ICANN Org’s Policy Development Support and the ICANN Board and Community on prioritization and planning for anticipated future work. Similarly, the GNSO Council notes that there has been no increase in the FY22 OFP as it pertains to expenditures to increase collaboration and planning for future ICANN Policy Work. The GNSO Council notes that the following program management tools have been developed: Program Management Tool (PMT), Action/Decision Radar (ADR), Project List, and Action Items. However, it is not clear how much budget is allocated to continuous development of the technology platforms devoted to tracking and analysis of the projects from the policy development and implementation support efforts. The GNSO Council requests that this information is provided to it.</p>	<p>See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking</p>

Generic Names Supporting Organization Council (GNSO)	<p>Examine the benefits of Face-to-Face Meetings. In its FY21 comments the GNSO Council acknowledged the usefulness of dedicated face-to-face meetings for certain policy efforts and commented that “[a]lthough 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. Due to the COVID-19 Pandemic, in FY21 no Face-to-Face Meetings were held and the GNSO Council is aware that ICANN Org has undertaken feedback from the ICANN Community concerning such remote participation meetings. The GNSO Council will await the results of such a survey and recommend that its data be utilized to look for cost savings where remote participation has served the ICANN Community well. Whilst the virtual meeting format has generally enabled GNSO’s work to proceed during the pandemic, there is also recognition (through community survey, the meeting strategy approach etc.) that either some specific policy issues have been more difficult to address ‘virtually’ or community engagement has proved more challenging, both at SO/AC and SG/C levels. As a result, consideration may be given to specific community or PDP F2F meetings in addition to ICANN F2F meetings to make the expected return-to-normal more ‘efficient and effective’.</p>	<p>See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking</p>
Generic Names Supporting Organization Council (GNSO)	<p>Ensure that the annual Operation and Financial Plan provides Working Group Chairs with tools and support to ensure effective and efficient leadership. In the GNSO Council’s FY21 comments, the following non-exclusive list of tools and support were identified: 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 asserted 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, in its FY21 comments, the GNSO Council recommended an FTE program manager and project manager to support PDP management (including WG chairs and policy staff), and the GNSO Council. The GNSO Council was disappointed that an FTE program manager was not hired and reiterates its recommendation for FY22. If this request is denied, the GNSO Council requests a written explanation as to why.</p>	<p>See section 2.7.4 Evolve and Strengthen the ICANN Community’s Decision-making Processes to Ensure Efficient and Effective Policymaking</p>

<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>The initiatives, tools and resources associated with PDP 3.0 should be explicitly individualized in the activities to enable the GNSO Council to adequately evaluate whether the recommended changes associated with PDP 3.0 are being adequately funded. Whilst the FY22 OFP provides numerous statements supporting ICANN Org’s commitment to “improve multistakeholder model processes, such as Policy Development Process 3.0 (PDP 3.0)”, there still are not specific references permitting the GNSO Council to verify that PDP3.0 improvements are funded under the FY22 Budget. This level of detail is lacking. The GNSO Council requests additional detail and insight into future budgets to determine whether PDP 3.0 initiatives, tools and resources are funded in the yearly ICANN Budget.</p>	<p>See section 2.3.9 Policy Development and Advice</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>Maintain adequate staffing for Policy Development Support. In the GNSO’s comment on the FY21 Budget, the GNSO Council remarked that with respect to Policy Development the total budget for FY21 was the same as for FY20, \$6.9M and 35 FTE. See ICANN FY21 Operating & Financial Plan at p. 245. However, the FY22 Budget reports that there were 34 FTE dedicated to Policy Development in FY21 and that the budget was \$5.1M for personnel and \$1.4M for non-personnel (for a total of \$6.5M). The GNSO Council would appreciate an explanation as to why budgeted expenses for Policy Development dropped by \$.4M. In addition, the FY22 Budget holds FTEs steady at 34 and increases personnel and non-personnel budgeted expenses by \$.6M, which appears to be an insufficient increase given the amount of Policy Development work the GNSO is facing for FY22. Lastly, the FY22 Budget indicates that Nonpersonnel expenses are \$1.7M. The GNSO Council requests details as to what activities make up these expenses. Further, the GNSO Council notes that prior years’ budgets had detail to “Project ID number” and were grouped by portfolio and project. This level of detail should be provided in a spreadsheet format</p>	<p>See section 2.3.9 Policy Development and Advice</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." As highlighted in last year's comments a significant aspect of the GNSO Council's responsibilities is to serve as a 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 and Planning team coordinates with the GNSO Council to be prepared for expenses related to these projects. The GNSO Council recognizes and takes seriously its responsibilities as a part of the Empowered Community in ensuring ICANN's accountability not only to the GNSO's communities, but to the global community overall</p>	<p>See section 2.5 ICANN Meetings, Constituent Travel and Community Engagement Support</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>As we have mentioned in previous comments, as part of its review, the GNSO Council examines the proposed budget to understand what resources have been allocated to each GNSO Stakeholder Group, and to the other Supporting Organizations and Advisory Committees. In prior years, that information was available to the community in the proposed budgets. However, this information is missing in the FY22 Budget. The GNSO Council requests that this level of information be provided. 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) without greater detail to approximate the levels of financial support provided directly and indirectly to the various Supporting Organizations, Advisory Groups, and associated Stakeholder Groups and Constituencies. This information is essential for each of these groups, including the GNSO Council to hold ourselves, and others, mutually accountable</p>	<p>See section 2.5.2 Constituent Travel and Additional Budget Request (ABR)</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>The GNSO Council further appreciates the Fiscal Year Budgets and the Operating & Financial Plan are being presented in a uniform manner. For instance, the Operating & Financial Plan contains 15 Operating Initiatives that describe how ICANN org will achieve the objectives and goals set out in the ICANN Strategic Plan, including low, midpoint and high fiscal year and five-year financial estimates. These uniform sections and information will allow the GNSO Council through the SCBO's work to track and discuss comments and requests that it made in the previous year and in future years.</p>	<p>See section 2.1.1 Document Details and Length</p>

<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>Finally, the time window for the SCBO review always occurs between the last ICANN meeting of the calendar year and the first ICANN meeting of the following year. In the spirit of continuous improvement for future budget and planning cycles, the SCBO will now aspire to be active year-round, which may include, for example, earlier collaboration with ICANN Org prior to the release of the draft budget and planning documents to better inform ICANN Org of anticipated resource needs within the GNSO. The SCBO is cognizant that this increased activity may impact already stretched resources and before making commitments, The SCBO will collaborate with the GNSO Council to consider the expanded scope of work and further collaborate with the SOPC to prevent duplication across both Supporting Organizations</p>	<p>See section 2.5 ICANN Meetings, Constituent Travel and Community Engagement Support</p>
<p>Generic Names Supporting Organization Council (GNSO)</p>	<p>Adequately funding planning and project management oversight. In its FY21 comments, the GNSO Council suggested that ICANN should set aside a substantial line-item budget for planning and project management oversight. The FY21 OFP indicates that</p> <p>The number of ICANN org resources involved over the five-year plan period are expected to increase as compared to the previous five-year plan period. This is to accommodate the need for operational alignment, prioritization, increased number and quality of plans, and increased communication. Limited external resources will be needed to help with education, skills, and facilitation at the beginning of the period as internal capabilities ramp up.</p> <p>Resources for this initiative are included within the functional activities of the financial plan core budget and therefore no incremental resources are needed.</p> <p>The GNSO Council reiterates its suggestion that a line-item entry for planning and project management oversight be added or that these specific resources be identified. This will allow the GNSO Council to evaluate and track the funding of this important resource. Furthermore, the GNSO points out that ICANN acknowledged both in the FY20 and FY21 OFP that ICANN resources dedicated to planning would be increasing. However, no increase appears to be built into the FY22 OFP.</p>	<p>See section 2.7.14 Planning at ICANN</p>

Generic Names Supporting Organization Council (GNSO)	In its FY21 Comment, the GNSO Council requested additional information to understand the criteria by which some events are listed under the Constituent Travel functional activity, while others were not. The GNSO Council suggested that criteria be explained or that all events be listed, which is a critical component to transparency. Again, for FY22 the same events are listed with the addition of the GNSO/GDD Summit: Placeholder for SO/AC Additional Budget Requests - \$300,000, NARALO General Assembly in Seattle - \$40,200, LACRALO General Assembly in San Juan - \$142,800, GNSO – GDD Summit/Working Sessions - \$113,440, and CROP Program - \$50,000. The GNSO reiterates its request for additional event details, if any	See section 2.5.2 Constituent Travel and Additional Budget Request (ABR)
Generic Names Supporting Organization Council (GNSO)	The GNSO Council further notes that the Contingencies section for the FY21 Budget was 4% of total expenses and had some analysis of upcoming work streams. The FY22 Budget has no such analysis and has maintained the same without discussion concerning the appropriateness of the 4% contingency. The GNSO Council requests an explanation of the factors used to determine an adequate contingency amount.	See section 2.2.1 Contingency
Generic Names Supporting Organization Council (GNSO)	The GNSO Council notes that there is an entry of \$5.5M USD for the FY22 Budget for Incremental Operating Initiatives. The GNSO Council requests specific details as to the allocations across the eight Operating Initiatives that show funding throughout the five-year plan	See section 2.6.2 Operating Initiatives Resources
gTLD Registries Stakeholder Group (RySG)	<p>Presentation and Complexity</p> <p>The RySG appreciates ICANN's efforts to provide comprehensive and detailed documentation, continued fiscal vigilance, and efforts to thoroughly plan and track expenditures. This said, the documents have become massive and challenging to deal with from a volunteer perspective.</p> <p>We appreciate that ICANN is responding to longstanding community requests for more detailed and transparent plans and budgets. We recognize this and so encourage ICANN to continue to improve how information is presented to and shared with the community in a digestible manner to offer more transparency and accountability.</p> <p>Unfortunately, providing detail is not without risk, it can reduce clarity of focus and make it more difficult to find information. The Plans do provide a substantive overview of the full range of actions and initiatives, but miss providing the information on progress, ongoing activities, work already done and priorities for the upcoming financial year(s), that allows the community to gain insight and perspective. Brief narratives that link achievements, ongoing work in the current fiscal year, and next year's plans and priorities, would help the community to better assess where any given project stands in relation to its goal.</p>	See section 2.1.1 Document Details and Length

<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>RySG suggestions to rationalize the documentation and optimize the public comment process on ICANN's Plans and Budgets</p> <p>The RySG suggests a number of actions and hopes to see improvements when next year's Plans and Budgets are presented:</p> <ul style="list-style-type: none"> ● Replicating structure and content of the documents, and the use of an indication (a delta (Δ)) for new initiatives is extremely helpful. In addition, we request that a redline version is made available that shows all changes within these documents from year-to-year. 	<p>See section 2.1.2 Future Improvement Suggestions.</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>For items that were initiated in prior years, we recommend including a brief narrative that updates on achievements, ongoing actions, and plans for the upcoming year, and situates the current state of the initiative compared to its ultimate goal(s).</p>	<p>See section 2.1.2 Future Improvement Suggestions.</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>To facilitate the Public comment proceeding, we suggest ICANN to compile specific questions for key issues that ICANN is seeking community guidance on. Clearly, such an approach should not limit or exclude commenting on other issues but instead provide an enhanced focus for specific comments.</p>	<p>See section 2.1.2 Future Improvement Suggestions.</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>Prepare more detailed quarterly financial updates (that provide information on ongoing projects and activities, as background to the current high-level update on Funding and Expenses).</p>	<p>See section 2.1.2 Future Improvement Suggestions.</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>Provide details on how specific initiatives perform and how budget is being spent in a concise but dynamic way throughout the year. For example, in the form of a barometer on the initiatives (via wiki-page) that feeds into the detailed quarterly financial updates suggested above.</p>	<p>See section 2.1.2 Future Improvement Suggestions.</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>Include budget updates with the relevant regular Board updates on how strategic goals are progressing.</p>	<p>See section 2.1.2 Future Improvement Suggestions.</p>

gTLD Registries Stakeholder Group (RySG)	The RySG would like to better understand how ICANN org evaluates the need for policy support and how it determines what portion of its funding should be dedicated to this core function of the organization. We request that additional information be added to the documentation, including projections based on the support provided in the current and previous year(s). Adequate funding for this area is critical because policy development is one of ICANN's core and most important functions.	See section 2.3.9 Policy Development and Advice
gTLD Registries Stakeholder Group (RySG)	While the documentation provides detailed information on ICANN's Strategic and Operational Activities, it lacks clear definitions and criteria that allow the reader to comment on or assess performance and success. We request ICANN to complete its plans by not only identifying goals and objectives but to also define success criteria for each of them.	See section 2.9 Progress Measurement and Reporting
gTLD Registries Stakeholder Group (RySG)	The RySG supports the ongoing activity to replenish the Reserve Fund from surplus operating funds. We take note of ICANN's intention to use part of the savings from not having face-to-face meetings to make a previously unplanned 10M USD contribution to the Reserve Fund at the end of FY20. The RySG would like to stress that diligent cost control of ICANN's expenditure remains a critical concern of this group in relation to an effectively functioning ICANN organization.	See section 2.2.6 Reserve Fund
gTLD Registries Stakeholder Group (RySG)	We would appreciate more transparency with regard to the Additional Budget Requests procedure, including an opportunity to provide feedback on rejection rationales that parties receive. Such an approach would not only improve transparency but reduce the frustration associated with failed ABRs.	See section 2.5.2 Constituent Travel and Additional Budget Request (ABR)
gTLD Registries Stakeholder Group (RySG)	We appreciate that 'ICANN org has begun to evaluate its existing carbon footprint and 'to gather information about greenhouse gas emissions from ICANN-related travel', as explained in last year's Staff report of Public comments and the ICANN CEO's blog post. We believe more transparency from ICANN regarding progress and a reasonable timeline would be beneficial. ICANN is a global organisation that should reasonably be expected to be both committed to monitoring the impact of its policies and operations - including but not limited to travel - on the environment and to reducing its impact on the consumption of natural resources	See section 2.5.1 ICANN Meetings

gTLD Registries Stakeholder Group (RySG)	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 program on top of an existing operational capability. Implementation of that 2012 program has now given way to steady-state operations at the significantly increased headcount level. Future rounds of new gTLDs are 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.	See section 2.8 Personnel and Headcount
gTLD Registries Stakeholder Group (RySG)	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 Global Domains and Strategy department and GNSO policy functions.	See section 2.4.5 Funding to Support Activities
gTLD Registries Stakeholder Group (RySG)	The ongoing focus on an annual contribution to the Reserve Fund (towards the target level) from surplus operating funds is logical. To the extent that the Board has taken the decision that a certain level of reserve funding is necessary to ensure organizational 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. 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 and moreover, that the contingency is seen to be exactly that and so not utilized without very good reason.	See section 2.2.6 Reserve Fund
gTLD Registries Stakeholder Group (RySG)	First, is it expected that the Board will be specifically covered by one of these policies?	See section 2.7.5 Develop Internal and External Ethics Policies
gTLD Registries Stakeholder Group (RySG)	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?	See section 2.7.5 Develop Internal and External Ethics Policies

<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>As raised in earlier comments and communication with ICANN, we stress the importance of providing transparency and detail on how the new gTLD Program Funds are being used. On p.23 of the FY22 Draft Budget it is mentioned that ‘ICANN org projects to have sufficient cash on hand in the Operating Fund through FY22 despite the uncertainty from the impact of COVID-19. In FY20, \$20 million of New gTLD Program funds were transferred to the Operating Fund as a reimbursement for expenses paid by ICANN in FY18-20.’</p> <p>We request ICANN to provide transparency with a breakdown and detailed justification of the costs accounted to the 2012 program.</p>	<p>See section 2.2.3 New gTLDs</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>The RySG suggests that the budget include an overview of anticipated costs and support for initiatives that are awaiting Board consideration but where implementation is expected to commence within this FY22 budget term. Understanding that for initiatives awaiting Board consideration (e.g. RPM and Subsequent Procedures recommendations) the expenditures would be estimated</p>	<p>See section 2.6.2 Operating Initiatives Resources</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<ul style="list-style-type: none"> ● 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. ● We continue to believe the community, including the customers of the RSS, should continue to drive the definition and setting of requirements, as well as future solutions, and not only involve interaction between ICANN and root server operators. ● The RySG appreciates ICANN’s Root Name Service Strategy and Implementation report (OCTO-16) providing additional information about the pros and cons of the hyperlocal root configuration and call attention to the RySG comments to that report. ● The RySG would also appreciate additional clarity about how the activities of the root server operators will be funded 	<p>See section 2.7.1 Support the Evolution of the Root Server System</p>
<p>gTLD Registries Stakeholder Group (RySG)</p>	<p>While the RySG supports this initiative in principle, we reiterate our request for ICANN to provide additional information around the purview and intended working methods of the “DNS Security Facilitation Center,” which is not defined or described with any detail. For example: What does ICANN see as its future role in DNS emergency readiness?</p> <p>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.</p>	<p>See section 2.7.2 Facilitate DNS Ecosystem Improvements</p>

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>The report notes that one measure of progress towards milestones in this area is “membership tracking by SOs, ACs, stakeholder groups, and constituencies and other metrics.” (page 196). 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. Can ICANN provide clarity into “other metrics” that it uses?</p>	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking
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. We appreciate ICANN’s continued efforts to increase transparency on these issues.	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking
gTLD Registries Stakeholder Group (RySG)	<p>Similar to Initiative 3, this is another critical issue for the viability of ICANN’s multistakeholder model.</p> <p>The RySG continues to emphasize that 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.</p> <p>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.</p>	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking
gTLD Registries Stakeholder Group (RySG)	<p>The RySG reiterates its requests for clarity on this initiative. 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?</p> <p>The RySG would also like to know whether such policies would also apply to Board members?</p>	See section 2.7.5 Develop Internal and External Ethics Policies

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.	See section 2.7.6 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, the RySG continues to 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.	See section 2.7.8 Root Zone Management Evolution
gTLD Registries Stakeholder Group (RySG)	Staff retention is an absolute necessity for the success of PTI / IANA functions	See section 2.7.8 Root Zone Management Evolution
gTLD Registries Stakeholder Group (RySG)	The RySG believes that an effective GAC is a crucial part of an effective multistakeholder model for ICANN. The RySG appreciates ICANN's work to continue to improve transparency around ICANN's engagement with governments and intergovernmental organizations and forums.	See section 2.7.9 Evaluate, Align, and Facilitate Improved Engagement in the Internet Ecosystem
gTLD Registries Stakeholder Group (RySG)	Monitoring is useful to understand what is coming and we appreciate ICANN's efforts in this area and to engage with the community to determine the type and level of engagement based on topical guidance and look forward to continued work on transparency and community engagement in this area	See section 2.7.11 Monitor Legislation, Regulation, Norms, Principles, and Initiatives in Collaboration With Others That May Impact the ICANN Mission
gTLD Registries Stakeholder Group (RySG)	Formalize the ICANN org Funding Model and Improve Understanding of the Long-term Domain Name Market Drivers We suggest where a provision of the plans is the same as, or building upon, a provision from the previous year plans that ICANN indicate progress achieved thus far including on dedication of personnel and arrangement of resources	See section 2.7.12 Formalize the ICANN org Funding Model and Improve Understanding of the Long-term Domain Name Market Drivers See section 2.9 Progress Measurement and Reporting
gTLD Registries Stakeholder Group (RySG)	We appreciate the commitment, which we view as essential, that ICANN Org will engage with the ICANN community and the Board as it works on researching and developing prioritization efforts in this regard	See section 2.7.14 Planning at ICANN

gTLD Registries Stakeholder Group (RySG)	As noted above, the RySG supports the ongoing activity to replenish the Reserve Fund from surplus operating funds. We take note of ICANN's intention to use part of the savings from not having face-to-face meetings to make a previously unplanned 10M USD contribution to the Reserve Fund at the end of FY20. The RySG would like to stress that diligent cost control of ICANN's expenditure remains a critical concern of this group in relation to an effectively functioning ICANN organization.	See section 2.7.15 Reserved Fund
ICANN Business Constituency (BC)	The BC is fully aligned with the submissions made with regards the initiative and preparations for the implementation of the Board-approved recommendations arising from the Cross-Community Working Group on New gTLD Auction Proceeds (CCWG-AP). As implementation would be funded from the Auction proceeds there would be no shock to the operations of ICANN as its core budget is not impacted.	See section 2.7.13 Implement New gTLD Auction Proceeds Recommendations As Approved by Board
ICANN Business Constituency (BC)	The BC commends ICANN's plan to continue to support and collaborate with key stakeholders in ensuring the stability, security and resilience of the DNS Root zone and the evolution of the Root Servers.	See section 2.7.1 Support the Evolution of the Root Server System
ICANN Business Constituency (BC)	It is unclear what amounts are committed to the KSK Rollover process and what it has caused ICANN over the last budget cycles? Owing to the experience gained from the first KSK Rollover, it is the belief of the BC that ICANN has improved on her skills and knowledge on how subsequent Rollovers should be affected and should periodically communicate to the community how the practice is evolving with cost saving mechanism built into the Process.	See section 2.7.1 Support the Evolution of the Root Server System
ICANN Business Constituency (BC)	Planning for emergencies, especially in a post-COVID era is critical at this time. Advocating for improved DNS Security architecture through deployment of DNSSEC and implementation of DANE is encouraged by Business.	See section 2.7.2 Facilitate DNS Ecosystem Improvements
ICANN Business Constituency (BC)	Business also encourages improvements on Technical Engagements and Capacity Development especially in ICANN Regions that lack such capacity through all probable means over the next 5 years.	See section 2.7.2 Facilitate DNS Ecosystem Improvements
ICANN Business Constituency (BC)	The BC supports that ICANN continues to foster successful and mutually beneficial relationships with local, regional, and global partners to ensure knowledge building about ICANN and its Mission and that ICANN is engaged, its role acknowledged, and its presence valued in the arenas where topics within its remit are discussed. The BC also supports that ICANN plays an important role in raising awareness among legislators, regulators, and stakeholders about its Mission and the effect of various regulatory and other proposals on the Internet ecosystem.	See section 2.7.9 Evaluate, Align, and Facilitate Improved Engagement in the Internet Ecosystem

<p>ICANN Business Constituency (BC)</p>	<p>Again the BC submits that the manner in which the resources in the budget of \$4.5M were allocated for Root Zone Management would have helped arrive at a better judgement of the adequacy of the budget.</p> <p>BC notes that the budget of \$4.5M includes resources for launching of a significant new version of the Root Zone Management System (RZMS) with redesigned backend, launching of a new authorization model to allow additional appropriate parties to be authorized as TLD managers with associated user management improvements and launching of customer application programming interface (API) access asides implementation of approved policy recommendations on IDNs. The implementation of approved policy recommendations on New gTLD Subsequent Procedures, ICANN org’s Operations team needs and Audit criteria of the RZMS needs should have at least have the ratios of their budget size represented in graphs or other analytical patterns.</p>	<p>See section 2.6.2 Operating Initiatives Resources</p>
<p>ICANN Business Constituency (BC)</p>	<p>The BC notes the concern around Political sensitivities to reducing some participation that the community relies on and would like to know the extent of study done to in a bid to mitigate issues arising.</p>	<p>See section 2.7.9 Evaluate, Align, and Facilitate Improved Engagement in the Internet Ecosystem</p>
<p>ICANN Business Constituency (BC)</p>	<p>The BC notes that approximately 1.5 FTEs within ICANN org’s Engineering and IT function would be deployed to perform software development and 1 FTE on the IANA team deployed to provide product management, design and requirements setting, however it is not clear if these deployments are completely new hires or realignments between the workforce which would result into no significant impact on the headcount.</p>	<p>See section 2.6.3 Root Zone Management Evolution</p>
<p>ICANN Business Constituency (BC)</p>	<p>The BC notes the Allocation of adequate resources to sufficiently monitor global dialogue and alignment with the Strategic Plan in the bid to increase the capacity of new members joining the GAC and by extension improving the outcomes from the GAC interventions and advice, but fail to see why the sum allocated to this operational initiative is not declared or a similar focus provided to the business community to enhance their participation in ICANN</p>	<p>See section 2.7.10 Through Targeted Engagement Improve Governments and Intergovernmental Organizations (IGOs) Engagement and Participation in ICANN</p>
<p>ICANN Business Constituency (BC)</p>	<p>Without aligning 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>See section 2.7.10 Through Targeted Engagement Improve Governments and Intergovernmental Organizations (IGOs) Engagement and Participation in ICANN</p>

<p>ICANN Business Constituency (BC)</p>	<p>Importantly, overall distrust and the zero-sum mentality that typify current silos are in some cases caused by the structural deficiencies. 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 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>See section 2.7.10 Through Targeted Engagement Improve Governments and Intergovernmental Organizations (IGOs) Engagement and Participation in ICANN</p>
<p>ICANN Business Constituency (BC)</p>	<p>We reinforce the BC's view that "We do already have a tool intended for silo breaking, which is Meeting B. The ICANN B Meeting is supposed to be exactly about making this sort of outreach, listening to each other, having sessions where we get to discuss."</p>	<p>See section 2.7.10 Through Targeted Engagement Improve Governments and Intergovernmental Organizations (IGOs) Engagement and Participation in ICANN</p>
<p>ICANN Business Constituency (BC)</p>	<p>The BC agrees that active development of community dialogue mechanism with support of ICANN org's Policy Development Support function could help in developing and mature systems to detect and monitor legislative initiatives and other governmental or IGO actions or initiatives that could impact ICANN's Mission or operations</p>	<p>See section 2.7.11 Monitor Legislation, Regulation, Norms, Principles, and Initiatives in Collaboration With Others That May Impact the ICANN Mission</p>
<p>ICANN Business Constituency (BC)</p>	<p>The BC is happy to collaborate further with the Regional Global Stakeholder Engagement teams to assist in analysis of reports on upcoming regional legislation that might impact ICANN and seek more collaboration in the analysis of data generated from such engagements.</p>	<p>See section 2.7.11 Monitor Legislation, Regulation, Norms, Principles, and Initiatives in Collaboration With Others That May Impact the ICANN Mission</p>
<p>ICANN Business Constituency (BC)</p>	<p>The BC believes that effective cross functional collaboration is essential for the success of the work ahead, and leading to the launch of the rounds. Based on the draft reports issued by the SubPro Policy Development Process Working Group, ICANN org through its Legal team, Communications, Global Stakeholder Engagement, Human Resources, Finance, Global Domains and Strategy desk, Office of the Chief Technology Officer, IANA, and Engineering and IT would need to guide the board through the Launch of the next rounds and the evaluation of every application received.</p>	<p>See section 2.7.6 Promote and Sustain a Competitive Environment in the Domain Name System</p>

ICANN Business Constituency (BC)	Noting that the processing of applications in future application rounds for new gTLDs is expected to remain subject to the principle of cost recovery with a need for a number of groundworks to support the launch before applications opens, the BC supports absolute transparency in the process leading to the allocation of funds and advises to the board concerning the source of funds that will need to be identified and approved by the Board.	See section 2.7.6 Promote and Sustain a Competitive Environment in the Domain Name System
ICANN Business Constituency (BC)	As there are indications to the possibility of a next round during this planning cycle, the BC proposes that a caretaker budget within a certain threshold deemed adequate to carter for the launch of the next rounds being a fraction of the expense gathered during the previous round be set aside from resources raised from the last subsequent round of new gTLDs which is separate from ICANN Operational core budget.	See section 2.7.6 Promote and Sustain a Competitive Environment in the Domain Name System
ICANN Business Constituency (BC)	The BC agrees that Universal Acceptance helps to breed innovation, while fostering competition and consumer choice. It is becoming increasingly important that outreaches to providers of standards and increased capacity for developers to update applications to be UA ready is relational to the outcomes expected in new gTLD rounds.	See section 2.7.7 Universal Acceptance
ICANN Business Constituency (BC)	The BC is fully aligned with the submission that ICANN should seek to validate and improve forecasting accuracy through review of data including zone files, registry transaction reports, contracted party family affiliation, corporate disclosures, market intelligence, and more to improve on the health of the Domain Name marketplace and reduce vices like abuse that negatively impact the market.	See section 2.7.12 Formalize the ICANN org Funding Model and Improve Understanding of the Long-term Domain Name Market Drivers
ICANN Business Constituency (BC)	The BC cautions that as ICANN org formalizes its funding model and plans to evaluate the migration of the forecast model to a platform that will provide a robust system for preparing and analyzing future funding projections, Internal systems already existing that can be customized to deliver such processes should be explored first before considering other options.	See section 2.7.12 Formalize the ICANN org Funding Model and Improve Understanding of the Long-term Domain Name Market Drivers
ICANN Business Constituency (BC)	The task of ensuring active participation with Global representation in the policy development process by all SO's/AC's is important for the BC and the huge demographic she represents. Equally continued improvements through specific reviews that are community and consensus driven to the ICANN By-Laws are welcomed by the BC.	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking

ICANN Business Constituency (BC)	The budget highlight specifies budget for 1 headcount as Project Manager to facilitate and advise as well as funds for implementation. The BC seeks clarity to know if the intention is for a staff in this resource role or a consultant to manage the By-Law Organizational and Specific reviews.	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking
ICANN Business Constituency (BC)	The BC continues to believe that the PDP 3.0 is an important step towards the improvement of the Multistakeholder model. It has been previously mentioned in comments by the BC 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.	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking
ICANN Business Constituency (BC)	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.	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking
ICANN Business Constituency (BC)	We believe that clearly defined scopes 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	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking
ICANN Business Constituency (BC)	We would like to reinforce the BC's concern 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 and induct them properly.	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking
ICANN Business Constituency (BC)	The process culminating in the launching of an Ethics webpage and dashboard may further make the ICANN website more challenging to navigate and increase difficulty in discovering information. Already 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.	See section 2.7.5 Develop Internal and External Ethics Policies

<p>ICANN Business Constituency (BC)</p>	<p>The global pandemic has forced an age of Remote work and this has increased the need and dependence on online collaborative tools with language support. As the number of online meetings increase, so will the need for language interpretation in real-time. The BC is glad to see ICANN make provisions for language support to the community but is unable to judge if \$1.5M USD is adequate for the scope of services to be covered over the 5-year period. There was also no note to indicate if the provisioned service is for the entire community or a selected few?</p>	<p>See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking</p>
<p>ICANN Business Constituency (BC)</p>	<p>The structure of the website needs to shift 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>See section 2.7.5 Develop Internal and External Ethics Policies</p>
<p>ICANN Business Constituency (BC)</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 streamlined manner.</p>	<p>See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking</p>
<p>ICANN Business Constituency (BC)</p>	<p>The BC believes that in making clearer what the ongoing processes are and what their expected outcomes should be, a good number of active community members will be assisted in being up to speed with ongoing efforts and potential threats. This is one major way priorities will be understood and agreed upon.</p>	<p>See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking</p>
<p>ICANN Business Constituency (BC)</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>See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking</p>

ICANN Business Constituency (BC)	We reinforce the BC's point over time 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".	See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking
ICANN Business Constituency (BC)	The BC is pleased to submit this comment on Draft ICANN FY22 Budget and FY22-26 Financial Plan. We thank ICANN Org for producing a comprehensive Operating and Financial Plan & Budget proposal that has benefited from comments on past drafts. In this respect, we can say that the BC is satisfied with the quality of the drafts produced. However, ICANN will benefit from more community engagement by reducing the volume of this document and introducing an Executive Summary that highlights the key points as attempted with the 14 page Highlight document.	See section 2.1 Document Structure and/or Future Improvement Suggestions
ICANN Business Constituency (BC)	The BC appreciates the breakout provided with the 15 Operating Initiatives and the thought given to the development of 34 Functional Activities within 5 service groups that represent the way ICANN Org operates the organization as presented in sections 2.2 and 2.3 of the Highlight documents.	See section 2.1.1 Document Details and Length
ICANN Business Constituency (BC)	We appreciate ICANN Org's diligence and clarity in presenting this year's draft, particularly in the circumstances of the pandemic and its unpredictability. The FY21 forecast is particularly welcome since so much has changed since the Adopted FY21 budget was approved. We recognize that the forecast was made after 4 months (July-October) and we recommend that an updated forecast be prepared as part of the review of this Public Comment.	See section 2.4.4 Future Forecasts
ICANN Business Constituency (BC)	Please provide more detail about the Incremental Operating Initiatives. We note the comment that Verisign's contribution to ICANN's Security, Stability, and Resiliency (SSR) initiatives was for a partial year in FY21, which coincides with the \$2 million, and we understand that Verisign is committing \$4 million for FY22, but it is not clear what the full \$5.5 million represents, particularly in the light that \$0 was budgeted in this area in the FY21 Adopted budget.	See section 2.6.2 Operating Initiatives Resources
ICANN Business Constituency (BC)	3.1.4. We note that Professional Services are not returning to FY19 levels. But we are not clear on why they would not, given the proposal for a full year of face-to-face meetings in FY22 where we understand that a significant portion of these services relate are attributed. While cost reductions are always welcomed, it is not clear how this was calculated	See section 2.2.5 Professional Services

ICANN Business Constituency (BC)	3.1.5. According to the chart, at no time since before FY17 has the headcount at ICANN been 405 FTEs. The highest was 397 in FY18. We understand that some personnel associated with the New gTLD program are being placed in normal ICANN operations, specific numbers do not appear to be easily identified so we are seeking clarification whether there are other new positions represented in these numbers.	See section 2.8 Personnel and Headcount
ICANN Business Constituency (BC)	3.2. With FY22 only 6 months away and it is unclear how ICANN has calculated a decrease in New TLD Fixed Fees. And while Fixed Fees are decreasing, transactions are increasing.	See section 2.4.2 Assumptions
ICANN Business Constituency (BC)	3.3. We note that while the number of constituent travelers that are budgeted across most SO/AC groups remain constant across FY22, there is a large increase in GAC representation from 40 to 74 during ICANN74. We were pleased to see that during the Draft FY22 Clarifying Question Report issued on January 26, 2021 that this was incorrectly posted here and will be moved into Additional Budget Requests as core activities in future drafts. Nonetheless, we would appreciate a better understanding of why the numbers swell so significantly for this one meeting.	See section 2.2.2 Expense Details
ICANN Business Constituency (BC)	3.3.3. FY21 and FY22 both have 2 meetings in same locations yet the budgeted amounts for the years are different. Cancun FY21 was budgeted at 4.2 and FY22 at 3.7. Similarly, The Hague FY21 3.7 and for FY22 3.5	See section 2.5.1 ICANN Meetings
ICANN Business Constituency (BC)	3.4. Both FY21 Adopted and FY22 draft, identify the same risks. While the experience of FY21 has informed an adjustment in allocations for half of these risks, GDPR compliance remains earmarked as TBD. We would expect that with an additional year of work devoted to examining the impacts of GDPR that some estimate could be identified for this.	See section 2.2.4 General Data Protection Regulation
ICANN Business Constituency (BC)	For FY22, ICANN org is expecting to have \$75 million in the New gTLD fund. The Multi-year View and chart at 5.1 indicates that the net remaining new gTLD fund is actually \$46 million at FY22 (by combining remaining from FY12 through Fy22). Please provide clarification on how the \$75 million under management is calculated for FY22.	See section 2.2.3 New gTLDs
ICANN Business Constituency (BC)	7.1. This document indicates that 2,450 registrars were accredited as of September 20, 2020. The funding calculation from accreditation fees then goes on to indicate that Annual Accreditation Fees for FY22 will be calculated from 2,356 registrars which includes an anticipated 28 new accreditations. Can you explain how the drop of 94 accreditations occurred?	See section 2.4.2 Assumptions
ICANN Business Constituency (BC)	7.3.1. the review of FY21 Adopted budget vs. the Forecast is valuable in setting an understanding for FY22. Notable was an increase in Capital from a budgeted \$1.2 million to a forecasted \$6.3 million – a 277% increase. Are you able to provide details related to FY21 Capital expenditures and also provide information related the FY22 draft Capital of \$4 million?	See section 2.2.2 Expense Details

ICANN Business Constituency (BC)	The BC notes that from the FY21 budget process 6 of the 34 individual ABR applications received have been moved to core ICANN FY22 budget for annual funding, while the BC has experienced a high decline in its budget requests Year on Year, reasons why production of BC Outreach materials that have enjoyed ABR approval since FY13 has not been moved to core ICANN FY22 budget would be welcomed.	See section 2.5.2 Constituent Travel and Additional Budget Request (ABR)
ICANN Business Constituency (BC)	The BC appreciates that the Fiscal Year 22 -26 Operating Budget and Financial Plan is presented in a uniform and organized manner containing 15 operating initiatives broken into Low, Midpoint and High fiscal estimates. The budget structure could help to track improvements where figures of previous years are benchmarked against the current cycle and where detailed breakdown of the votes are provided.	See section 2.1 Document Structure and/or Future Improvement Suggestions
ICANN Business Constituency (BC)	That ICANN Org's is planning to keep a stable headcount through the FY22 – 26 given the realities posed by the pandemic and other uncertainties is welcoming, but there is need to explain how activities that would become heavily dependent on personnel like the next rounds of New gTLD Auctions and consolidation of reviews amongst other policy development tracks will be managed with the existing staff strength.	See section 2.8 Personnel and Headcount
ICANN Business Constituency (BC)	In the plan for FY22 – 26 the operating initiatives is projected to consume 5% of ICANN budget by FY26, whilst this is comparatively small compared to a 55% margin allocated as personnel cost, the components of this cost item need to be broken down further to allow for easy tracking and justification.	See section 2.6.2 Operating Initiatives Resources
ICANN Business Constituency (BC)	As highlighted in our earlier comment on the budget for FY22, the budget item on Incremental Operating Initiatives has a vote for \$5.5M USD but no provisions are highlighted for the other years leading up to FY26. The BC request that in addition to the specific details of this vote, the plan leading up to FY26 should be highlighted.	See section 2.6.2 Operating Initiatives Resources
ICANN Business Constituency (BC)	The BC notes the desire to develop mechanisms by which the community can be alerted on issues relating to rapid growth of the Root Zone, development of a monitoring system to collect data on the operations of the Root Server Systems as discussed in RSSAC 047 and development of mechanisms to further distribute and scale the Root of the DNS, more details would be required before we are able to adjudge if the budgeted mid-point sum of \$4.5Million Dollars would be adequate over the 5-year period.	See section 2.6.2 Operating Initiatives Resources
ICANN Business Constituency (BC)	The BC has committed its own funds in the current Financial Year towards Research and encourages ICANN to do more especially around issues that focuses on the health of the DNS Ecosystem. Again, due to the lack of details in the base budget proposed, the BC is unable to conclude if the sum of \$6M USD allocated for this core aspect of ICANN operations over a 5-year period is adequate.	See section 2.6.2 Operating Initiatives Resources

ICANN Business Constituency (BC)	The details provided makes it difficult for the BC to judge if the mid-point and base sum of \$4.3M USD provisioned for strengthening the MSM over the next 5 years is adequate.	See section 2.6.2 Operating Initiatives Resources
ICANN Business Constituency (BC)	The BC finds it difficult to support the development of an Internal ICANN Org Ethics Policy and another for ICANN community Ethics Policy and the attendant gap analysis for close to \$1M USD	See section 2.6.2 Operating Initiatives Resources
ICANN Business Constituency (BC)	The BC notes that declaring the budget allocated to this initiative would aid transparency and allow for better accountability for resources.	See section 2.6.2 Operating Initiatives Resources
ICANN Business Constituency (BC)	The BC notes that the number of ICANN org resources involved over the five-year plan period are expected to increase as compared to the previous five-year plan to accommodate the need for operational alignment, prioritization, increased number and quality of plans, and increased communication but fail to see how this is catered for in the budget.	See section 2.7.14 Planning at ICANN
ICANN Business Constituency (BC)	The BC also notes that Limited external resources will be needed to help with education, skills, and facilitation at the beginning of the period as internal capabilities ramp up. More details on the skillset of the external resources required and the gap that exist in that wise internally would be helpful	See section 2.7.14 Planning at ICANN
ICANN Business Constituency (BC)	The BC agrees that newer community members need time to get used to ICANN's planning process and may not fully engage in Public Comment proceedings basically due to the large volume of details in the documents presented for public comments and the need to read through each line of documentation and possibly require additional information. This in itself is quite a herculean task for any veteran, let alone a newcomer. ICANN needs to seek better ways to present its financials such that it provides a high-level explanation of the budget and financial plan with clarity while being concise.	See section 2.7.14 Planning at ICANN See section 2.6 Operating Initiative Resources
ICANN Business Constituency (BC)	The BC also agrees that ICANN will need to provide information and engagement opportunities to ensure that the Bylaws-mandated review and Empowered Community timelines are achievable. 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.	See section 2.7.14 Planning at ICANN
ICANN Business Constituency (BC)	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.	See section 2.7.14 Planning at ICANN

<p>ICANN Business Constituency (BC)</p>	<p>In furtherance to the Board resolution to replenish the Reserve Fund to an amount equal to one year of operating expenses as the minimum target level of the Reserve Fund the BC applauds the continuous replenishment of the reserve fund but would like a situation where the margin is increased relative to the amount generated in the Financial year. A savings of \$1M USD relative to an income of \$141M USD is relatively marginal. The BC is concerned that if the level of the Reserve Fund is expected to grow to approximately \$165 million by the end of FY26, deliberate savings must be made into the funds</p>	<p>See section 2.7.15 Reserved Fund</p>
<p>ICANN Business Constituency (BC)</p>	<p>The BC note that since the replenishment strategy suggests that approximately USD \$32 million be allocated to the Reserve Fund over eight years, savings made from the non-conduct of physical meetings through FY20-21 should be added to the Reserve funds to cause for the desired buffer for future increases in operating expenses if it were triggered.</p>	<p>See section 2.7.15 Reserved Fund</p>
<p>ICANN Governmental Advisory Committee (GAC)</p>	<p>The GAC appreciates that ICANN org staff have not only recognized the GAC’s intention to proceed with planning the committee’s next High Level Governmental Meeting (HLGM) but also have made apparent allowances for providing travel support resources for such an eventuality in FY22 (see Draft FY22 Budget at page 12). The Draft FY22-26 O&FP further reinforces that delivery of GAC HLGM meetings are a key progress milestone needed to increase the engagement and participation of governments and intergovernmental organizations in the work of ICANN (see Draft FY22-26 O&FP at page 49). The GAC Leadership is currently collaborating with the ICANN Governmental Engagement Team to review and consider the best options available for the committee’s next HLGM in FY22 or beyond</p>	<p>See section 2.3.5 Government and Intergovernmental Organization Engagement</p>
<p>ICANN Governmental Advisory Committee (GAC)</p>	<p>The GAC thanks the ICANN org Finance Team for further improving the detail and scope of information provided to the community in the draft operating plan and budget materials. Over the past few years, the GAC Leadership has observed ongoing improvements to the format and detail of the extensive materials made available for community review as well as the information provided during direct opportunities for community information sharing with the ICANN org Finance Team. It has also been noted that this year’s public comment opportunity has again been moved up to occur earlier in the calendar year, continuing the trend of productively extending the time period available for organizational and community planning.</p>	<p>See section 2.1.1 Document Details and Length</p>

<p>ICANN Governmental Advisory Committee (GAC)</p>	<p>The GAC is pleased to acknowledge the apparent careful coordination within and between both the Draft Operating and Financial Plans for FY22-26 and FY22 (hereinafter Draft FY22-26 O&FP - https://www.icann.org/en/system/files/files/draft-op-financial-fy22-26-opplan-fy22-2020-en.pdf) and the Draft FY22 Operating Plan & Budget (hereinafter Draft FY22 Budget draft-budget-fy22-2020-en.pdf). The draft documentation allows readers to see how the organization’s strategic and operating initiatives are addressed over the course of both one-year and five-year operating plan periods. This coordination is important in providing assurances to governments that particular areas of GAC interest are preserved as important organizational operational priorities that will be adequately resourced over the next five years.</p>	<p>See section 2.1.1 Document Details and Length</p>
<p>ICANN Governmental Advisory Committee (GAC)</p>	<p>In describing functional activities involving community engagement and service, the Draft FY22-26 O&FP continues to recognize the need for increased resources to address “[s]takeholder demand for engagement and capacity development through the GAC’s Underserved Regions Working Group and Public Safety Working Group” (see Draft FY22-26 O&FP at page 116). In past years, the GAC has had to rely on the ICANN Additional Budget Request phase of the annual ICANN budget cycle to secure support for its successful capacity building workshop program. The GAC was pleased to receive assurances from ICANN org staff this year that those workshops can be adequately resourced from the core organizational budget during FY22 as the community eventually returns to face-to-face meetings. The GAC hopes to be able to use the available engagement resources to plan and implement two face-to-face regional capacity building workshops and another workshop in conjunction with an ICANN public meeting during FY22.</p>	<p>See section 2.5 ICANN Meetings, Constituent Travel and Community Engagement Support</p>
<p>ICANN Governmental Advisory Committee (GAC)</p>	<p>The GAC also supports the resource commitment in the Draft FY22 Budget to maintain constituency travel support at the current FY21 budget levels. While it is possible that in future budget years it may be needed to temporarily increase community travel support to encourage attendance as ICANN public events return to in-person formats, it is also reasonable to expect in FY22 that many potential attendees will be either personally leery of or professionally not permitted to engage in international travel for much of the budget year. In fact, improvements to remote meeting access developed during ICANN 67, 68 and 69 may limit future demand for in-person attendance at public ICANN events.</p>	<p>See section 2.5.1 ICANN Meetings</p>

<p>ICANN Governmental Advisory Committee (GAC)</p>	<p>GAC members generally support the 15 ICANN Operating Initiatives as described in the draft documentation (see Draft FY22-26 O&FP at page 14) – particularly the initiative to “Monitor legislation, regulation, norms, principles, and initiatives in collaboration with others that may impact the ICANN mission”. It is noted that this important operating initiative is incorporated across a number of the ICANN organization’s functional activities in both the five-year and one-year time frames including in the Office of The Chief Technology Officer (id. at pages 65 and 234), Government and Intergovernmental Engagement (id. at pages 113 and 283), Global Communications and Language Services (id. at pages 124 and 293), and Governance Support (id. at pages 137 and 307).</p>	<p>See section 2.7.11 Monitor Legislation, Regulation, Norms, Principles, and Initiatives in Collaboration With Others That May Impact the ICANN Mission</p>
<p>ICANN Governmental Advisory Committee (GAC)</p>	<p>Governmental regulatory attention related to Internet issues has become one of the key factors impacting the current Internet ecosystem, and in particular ICANN, in recent years. Noting that ICANN is committing resources in each of the mentioned functional activities above (see, id. Financial Estimates Table at page 182), the GAC reaffirms its commitment to ICANN’s mission to ensure the stable and secure operation of the DNS.</p>	<p>See section 2.6.1 Financials</p>
<p>Individual</p>	<p>I am requesting that Planning and Finance be more mindful of accessibility issues when posting documents. ICANN should ensure that they follow the Web Accessibility Guidelines established by the World Wide Web Consortium (W3C) and the Web Content Accessibility Guidelines, WCAG 2.0 or later, https://www.w3.org/TR/UNDERSTANDING-WCAG20/. Many of the figures and tables used in the document do not contain ALT text describing the table or figures so that a person who is blind or has low vision and uses a screen reader can read these documents. Color contrast is a common web accessibility issue that is often overlooked. The same goes for icons and situations where highlighting is used to draw attention (such as the hover effects on links). It is a good idea to ensure that the contrast ratio between text color and background color is at least 4.5:1. For Level AA conformance, WCAG 2.0 Success Criterion 1.4.3 recommends that regular text has a minimum contrast ratio of 4.5:1 and that large text (18-point or 14-point bold) has a minimum contrast ratio of 3:1. A common question web designers have when addressing color contrast is what colors to avoid. It is not so much about avoiding colors as much as it is about ensuring that colors used in web design have appropriate contrast. http://www.w3.org/TR/UNDERSTANDING-WCAG20/visual-audio-contrast-contrast.html. There is also a lack of any Accessible Bookmarks. These bookmarks help people using screen readers access different pages and topics covered in the report. Adobe’s accessibility checker stated that the documents lacked these features.</p>	<p>See section 2.1.2 Future Improvement Suggestions.</p>

<p>Non-Commercial Stakeholders Group (NCSG)</p>	<p>In 2019, the NCSG formulated a few recommendations, including, in part, the following: Look inward at its own overall spending patterns and provide a clearer explanation as to how operational efficiencies will be achieved this year and into the future. Provide the community with further clarity around who is authorizing spending and where resources are going in the community</p>	<p>See section 2.4 Funding Assumptions and Projections</p> <p>See section 2.5 ICANN Meetings, Constituent Travel and Community Engagement Support</p>
<p>Non-Commercial Stakeholders Group (NCSG)</p>	<p>In all, we are satisfied that ICANN is currently contemplating on a stable operating expenditure for FY22 to FY26. This is especially important given its own revenue forecast for the period, which displays a non-negligible risk of a slight decrease</p>	<p>See section 2.4 Funding Assumptions and Projections</p>
<p>Non-Commercial Stakeholders Group (NCSG)</p>	<p>The funding for the Operating Initiatives is forecasted to take slightly less than 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>In that regard, we welcome the information provided by the table on page 4 of the Highlights document, as it gives us an idea as to what the midpoint scenario involves in terms of yearly resources usage and attribution until 2025. That being said, we believe that such information could also have found its place in the larger document, eventually with a more granular breakdown, when appropriate. In cases where a more granular breakdown of expenditures is not possible, at least a form of forecast can be given for the upcoming FY. For example, we believe that Org probably knows how much it will spend on/pay the project manager for the Operating Initiative Nr. 3 (Evolving the Multistakeholder Model) at least for the upcoming FY. Such information should be included in both the Highlights and the more detailed Plan</p>	<p>See section 2.6.2 Operating Initiatives Resources</p>
<p>Non-Commercial Stakeholders Group (NCSG)</p>	<p>We are wary of the processes that involve external consultants or project managers, 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</p> <p>We note that Operating Initiatives Nr. 1, 3, 5 and 7 all include consultant/project manager-type of expenditure.</p>	<p>See section 2.2.5 Professional Services</p>

Non-Commercial Stakeholders Group (NCSG)	The lack of funding to some Operational Initiatives, justified by its inclusion within functional resources, draws our attention. Even though most aspects of this OIs would be indeed included in the functional activities, identifying and allocating resources for previsible unexpected costs could be fruitful. This apparently was made in some OIs, such as small amount of resources can be allocated specifically to topics such as “Formalize the ICANN org Funding Model and Improve Understanding of the Long-term Domain Name Market Drivers”, but not in others that present in their Considerations section the risk of demanding more resources, such as “Evaluate, Align, and Facilitate Improved Engagement in the Internet Ecosystem” and “Monitor Legislation, Regulation, Norms, Principles, and Initiatives in Collaboration With Others That May Impact the ICANN Mission”.	See section 2.6.2 Operating Initiatives Resources
Non-Commercial Stakeholders Group (NCSG)	About topic 5 (“Develop Internal and External Ethics Policies”), considering the diversity and multiculturalism within ICANN, as well as the inherently delicate nature of ethical policies and the primary risks being “lack of internal and external awareness of the work and resulting lack of buy-in to the effort.”, it would be fruitful for the budget to define extra and more detailed steps of public consultation in identifying gaps, which would help provoke engagement. Furthermore, “Tracking mechanism” mentioned in the collaboration with ICANN’s Engineering and IT functions should be better explained	See section 2.7.5 Develop Internal and External Ethics Policies
Non-Commercial Stakeholders Group (NCSG)	<p>Separately, as was mentioned last year in our comment, over FY21, ICANN is/was planning to fund meetings of both the European and Latin American components of ALAC, for a total sum of One hundred and seventy thousand US Dollars (US\$170,000). We understand that such information is now presented under the header “Other SO/AC Events” along with such other funded events. This is a positive development.</p> <p>There are two elements we would like to highlight with regard to constituent travel funding. First, we observe a high discrepancy in constituent travel funding amounts across locations for a given SO/AC, discrepancies that do not seem to peg with the general cost of the location of the meeting.</p>	<p>See section 2.2.2 Expense Details</p> <p>See section 2.5 ICANN Meetings, Constituent Travel and Community Engagement Support</p>
Non-Commercial Stakeholders Group (NCSG)	Second, we also observe the high amount of funding provided by Org to regional At-Large organizations’ general meetings, totaling One hundred and eighty-two thousand US Dollars (US\$182,000), while CROP, an initiative that benefits all of ICANN community members (including ALAC members) receives three times less support. Additionally, CROP funding is subject to strict guidelines, including transparency. Indeed, CROP guidelines and actual funding are readily available through a simple search engine query, while it is much more difficult to figure out on what basis ALAC was granted more than 180 000 USD for its regional meetings and what justifies these amounts. Such information must be included in the budget.	See section 2.5.2 Constituent Travel and Additional Budget Request (ABR)

Non-Commercial Stakeholders Group (NCSG)	<p>While these OIs are integrated within the core budget, we question the decision not to attribute a specific budget line to them. This is particularly true considering how central these OI appear with regard to ICANN's task, and how relevant they are with regard to a unified and global internet.</p> <p>Moreover, accomplishing these OIs would be helpful to the performance of other ICANN functions. The need for incremental resources is even mentioned in the considerations ("Possible increased resources needed to cover new venues with additional technical resources for legislative analysis") and as such having a designated amount for unexpected costs could be a more transparent approach.</p>	See section 2.6.2 Operating Initiatives Resources
Non-Commercial Stakeholders Group (NCSG)	<p>Although the development of a forecasting tool for market trends requires specific funding, it's not clear what justifies One million US Dollars (1M USD), while it appears that part of this OI is already integrated in the functional activities. This choice to attribute a specific budget line to this OI appears more puzzling when considering the opposite choice that was made for OIs 9 and 11, for example.</p>	See section 2.6.2 Operating Initiatives Resources

3.2 Public Comments Received after the public comment period deadline

Submitter Organization/ Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
Article 19	<p>Our analysis shows that the draft operating plan contains several positive and commendable provisions, including inclusion of "implementation of Board-approved recommendations of the Cross-Community Working Group on ICANN Accountability Work Stream 2" and "facilitation and implementation of the Enhancing the Multistakeholder Model work plan".</p> <p>However, this is not reflected in the actual budget. Which means that despite being mentioned, the implementation might be a challenge and thus no actual steps to implement the human rights recommendations under Work Stream 2 recommendations would have been taken.</p> <p>ARTICLE 19 therefore urges ICANN to consider the recommendations below, which would help align the ICANN Draft FY22-26 Operating & Financial Plan and Draft FY22 Operating Plan & Budget more closely with international law and best practice.</p>	See section 2.2 Financial Management

Article 19

We welcome the inclusion of the following two items into the draft operating plan:- “implementation of Board-approved recommendations of the Cross-Community Working Group on ICANN Accountability Work Stream 2” and “facilitation and implementation of the Enhancing the Multistakeholder Model work plan”.

These two items are key to achieving human rights within the ICANN multistakeholder community and we have written about them before 2 noting that “...The Workstream 2 Recommendations on Accountability are seen as a big step ahead in the incorporation of human rights in ICANN’s various processes, with over 100 recommendations on aspects ranging from diversity to transparency. An Implementation Team has been constituted which comprises the Co-chairs and the rapporteurs from the WS2 subgroups. They will primarily help the ICANN organization in interpreting recommendations of the groups where further clarification is needed on how to implement the same. As the next step, an Implementation Assessment Report has recently been published which looks at the various resources and steps needed. The steps are categorized into actions meant for one of the 3; the ICANN Board, Community and the ICANN organization itself. These will be funded by ICANN’s General Operating Fund, the Board and the org.

The report is divided into the following 8 issues: 1) Diversity, 2) Guidelines for Good Faith, 3) Recommendations for a Framework of Interpretation for Human Rights, 4) Jurisdiction of Settlement of Dispute Issues, 5) Recommendations for Improving the ICANN Office of the Ombudsman, 6) Recommendations to increase SO/ AC Accountability, 7) Recommendations to increase Staff Accountability and 8) Recommendations to improve ICANN Transparency....”

While we appreciate that the draft operating plan mentions these two issues (WorkStream 2 recommendations and Enhancing Multi Stakeholder Model workplan); it is important to highlight that these are mentioned vaguely only in the operating plan but not explicitly listed under the budget. This oversight makes it difficult to understand what is budgeted for under each of the 100 Board-approved recommendations of the Cross-Community Working Group on ICANN Accountability Work Stream 2” and the amount budgeted for “facilitation and implementation of the Enhancing the Multistakeholder Model work plan”.

In this regard, ICANN should clearly and explicitly publish what amount is budgeted for under each of the 100 recommendations and also the amount budgeted for “facilitation and implementation of the Enhancing the Multistakeholder Model work plan”. This will help ensure that internet users’ human rights at the Domain Name System level are taken seriously and the internet is governed in a public and multistakeholder manner

See section 2.7.3 Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking

The Registrar Stakeholder Group (RrSG)	The RrSG sees a notable increase in headcount (+10) between FY21 and FY22. Although this accounts for the increased personnel costs (+3.5 million USD), given there is not a lot of growth expected in the domain name industry, more information on what the additional staff are being hired for would be appropriate.	See section 2.8 Personnel and Headcount
The Registrar Stakeholder Group (RrSG)	The RrSG further notes that in the breakdown of ICANN meeting constituency travel for ICANN72 - 74 (pg 12), Fellows have almost the same allocation as GNSO (45 v 49 trips per meeting), with NextGen receiving a further 15 trips per meeting. As the RrSG has previously commented on several occasions, in their current form the Fellowship and NextGen programs offer limited benefit to the majority of GNSO's SG/Cs. Given the GNSO is both responsible for policy development and are the primary participants in it, it seems inappropriate that less travel support be given to those who are actually involved in a key purpose of both ICANN and face to face meetings. To be clear, the RrSG is not necessarily advocating for a higher travel budget, but a reduction in size (and preferably a consolidation and streamlining) of the Fellowship and NextGen programs so that some of the travel funds can be redistributed to the GNSO, or at least others whose presence will actually help progress the important policy work done at ICANN meetings. The RrSG would further like to know whether the draft plan and budget accounted for the money saved from prior ICANN meetings that were held virtual, instead of face-to-face	See section 2.5 ICANN Meetings, Constituent Travel and Community Engagement Support
The Registrar Stakeholder Group (RrSG)	Finally, the forecast and adopted budget (pg 32) appear to be very different. The RrSG would like to know if there has been a change in method to make the forecast that accounts for the difference	See section 2.2.2 Expense Details
The Registrar Stakeholder Group (RrSG)	It appears that the FY22-26 Operating Plan & Budget does not take into consideration any new gTLD round launch in the next five years. Creating such a conservative budget in this respect may lead to issues, since a new round is certainly at least a possibility.	See section 2.6.2 Operating Initiatives Resources