Staff Report of Public Comment Proceeding

Draft PTI Strategic Plan FY21-24	
Publication Date:	16 June 2020
Prepared By:	Marilia Hirano

Public Comment Proceeding			**Important Information Links**
Open Date:	20 April 2020		Announcement
Close Date:	1 June 2020		Public Comment Proceeding
Staff Report Due Date:	15 June 2020		View Comments Submitted

Staff Contact:	Marilia Hirano	**Email:**	marilia.hirano@iana.org

Section I: General Overview and Next Steps

This is a draft of the Public Technical Identifier's (PTI) first Strategic Plan for community review and input prior to finalization and adoption by the PTI Board of Directors. The plan defines PTI's strategy in delivering the Internet Assigned Numbers Authority (IANA) functions and represents a subset of the ICANN organization's strategy. The PTI Board has developed this draft with IANA staff and the broader ICANN org, proposed to cover the fiscal years 2021 through 2024. During the Public Comment proceeding, PTI held community webinars on the topic and received feedback that were then submitted as Public Comment and accounted for in this report.

Next Steps:

The amended draft and the public comments will be considered by the PTI Board of Directors for adoption. This is anticipated for the next meeting of the PTI Board at the end of June 2020.

Section II: Contributors

At the time this report was prepared, a total of eight (8) community submissions had been posted to the forum. The contributors, all from organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
Caribbean Telecommunications Union/ GAC Liaison to the CSC	Nigel Cassimire	CTU
Country Code Names Supporting Organization SOPC	Giovanni Seppia	ccNSO SOPC
ARTICLE 19	Ephraim Percy Kenyanito	A19
gTLD Registries Stakeholder Group	Samantha Demetriou	RySG
At-Large Advisory Committee	Holly Raiche and Ricardo Holmquist	ALAC
Business Constituency	Steve DelBianco	BC
Non-Commercial Stakeholder Group	Rafik Dammak	NCSG
Root Server System Advisory Committee	Ozan Sahin (RSSAC support staff)	RSSAC

Section III: Summary of Comments

The Draft PTI FY21-FY24 Strategic Plan received a total of eight comments from the above mentioned organizations and community groups. All of the comments are supportive of the objectives and goals laid out in the plan. Objective 5 received the most comments of support, specifically on its Targeted outcome "Alignment of PTI Strategic Planning timeline to ICANN's five-year planning cycle."

Clarification was requested in the way the risks were outlined. Some asked for mitigation plans to be defined alongside the risks, and other comments asked the team to clarify a particular risk. A specific risk that was asked about in a few of the submissions is "The evolving data privacy regulation landscape may have impacts on the level of transparency for the IANA registries, which may erode trust and accountability," which is a risk identified for Objective 1. There were questions about mitigation of that risk, and questions on whether this would be a risk given the nature of the IANA functions. On that same topic, there were commenters who suggested that PTI increases its participation in policy discussions such as EPDP. Lastly, commenters asked for the plan to include SWOT (strengths, weaknesses, opportunities and threats analysis).

Section IV: Analysis of Comments

We have grouped the comments we received into three main categories.

1) Plan Structure - includes comments that relate to how the plan was written and its overall structure.
2) PTI Remit - includes comments that ask for further explanation of the work for which PTI is responsible.
3) Business Continuity - includes comments that touch on PTI's ability to sustain operations given the COVID-19 Pandemic.

Comments on Plan Structure	Response
Request for editorial changes: replace verbs with nouns to distinguish actions and means to achieve them. (ccNSO SOPC)	Thank you for your suggestion. After careful consideration, we decided to keep the verbs in the Objective because replacing them with nouns produced less clarity. The rephrasing also gave an impression that the objective had been achieved in cases where it had not.
Commenters offered general support for the overall approach and the objectives listed. (ccNSO SOPC, ALAC, BC, NCSG, RSSAC, CTU)	Thank you for the review and your support.
Commenters asked to better articulate how the current Draft PTI FY21-24 Strategic Plan will be translated into an Operating Plan including prioritisation. (RySG)	Thank you for this suggestion. We have included an explanation on how the plans align in the draft, and linked back to ICANN's Five-Year Operating Plan where there will be details on how we will achieve our strategy.
Commenters requested that the Risks be clarified to include a mitigation strategy. (A19, CTU, BC, NCSG).	Thank you for your suggestions and concerns with how the risks are laid out in the plan. We have made changes to the Risk sections of the Draft PTI FY21-FY24 Strategic Plan to include actions we are taking, or plan to take to address the identified risks. We took into account the inputs in support for the Plan to stay concise when addressing the need to include risk mitigation. We were also careful to not divulge confidential information that could in itself increase risk to PTI. For more information on how PTI will achieve our strategic objectives, please review the ICANN FY21-FY25 Operating Plan and the PTI Annual Operating Plan & Budget documentation that comes out ahead of every fiscal year.
Commenters asked PTI to include SWOT analysis, or clarify in the plan, if one was conducted. (CTU, NCSG, BC)	While it is best practice to conduct a SWOT analysis as input into an organization's strategic planning process, it is not common for organizations to include the complete findings of such exercise in the Strategic Plan. That being said, we agree it is useful to explain how we gathered input to drive our strategy. To address this comment, we have included the work that went into the Strategic Plan development to the Introduction section of the plan. We also included the key strengths and weaknesses identified through those mechanisms that were deemed priorities when developing our Plan.

Commenter asked for clarification within the plan on lessons learned from the use of the IANA Stewardship Transition Plan as an interim Strategic Plan. (BC)	Thank you for your comment. To support the comments that appreciated the simple, concise structure of the Plan, while also addressing your comment, we would like to point out that Objective 5 was mainly created to address lessons learned since PTI was established. Sections 5.2 and 5.3 of Objective 5 focus on work we've identified to reduce that complexity and try to eliminate duplication of efforts. The IANA Stewardship Transition Plan was not explicitly structured as a strategic plan. It was structured as the set of tasks needed to ensure PTI was fully operational and ready to deliver the IANA functions. We have now successfully completed those tasks.

Comments on PTI Remit	Response
Commenters in support of aligning the time horizon of the PTI Strategic Plan to ICANN's Strategic Plan. (CTU, NCSG, ALAC, BC).	PTI and ICANN org recognize that having separate cycles is not ideal. This is why we plan to prioritize the work needed to align the timing of PTI's Strategic Plan to ICANN's planning cycles. This is highlighted as Targeted Outcomes of Strategic Objective 5, more specifically through 5.2 and 5.3.
Commenter requested incorporating a Human Rights Impact Assessment as part of ICANN's monitoring and assessment processes, as well as in its Bylaws. (A19)	PTI's operations are inherently tied to ICANN's. PTI is an entity formed by ICANN for the purpose of performing the IANA Functions through contracts with ICANN. The two entities are closely linked, with ICANN maintaining obligations for many support areas through the [Services Agreement](#) between PTI and ICANN. The 2019 Human Rights Impact Assessment (HRIA) performed for ICANN looked at four operational functions within the organization: Human Resources, Procurement, Events and Security Operations. Under Section III of the Services Agreement, each of these functions are provided to PTI by ICANN, therefore the efforts under the HRIA already are addressed as it relates to PTI. As PTI performs limited operational activities under contract to ICANN, the concept of placing a reference to human rights into the PTI Bylaws does not appear to be a solution that is appropriately tailored to PTI's role.

Commenters supported PTI being more active in policy development discussions that will impact the IANA functions. (ALAC, NCSG)	The IANA Naming Function Agreement with ICANN continues an historical limitation on PTI's role: "[PTI] shall ensure that its staff performing the IANA Naming Function do not publicly initiate, advance or advocate any policy development related to the IANA Naming Function." PTI is expressly prohibited from participating in policy development activities beyond the provision of information, expertise and insight. PTI's remit involves implementing agreed policies and principles in a neutral and responsible manner. We have and will continue participating in policy discussions when invited by the community working groups to contribute our expertise. We note, for example, the extensive collaboration we have had on certain ccNSO policy development processes that pertain to the IANA functions, at the invitation of the ccNSO. PTI also regularly contributes to internal ICANN org discussions regarding the potential operational impact of policies under development, and in that process PTI is called upon to provide feedback. We have worked closely with the Policy Development Support team in these discussions. Working groups that feel PTI can contribute necessary expertise to their deliberations (i.e., regarding the operational impact of policy on IANA operations, or historical experience on a particular matter) should consider appropriate mechanisms, such as liaison relationships or seeking operational impact reviews of draft proposals.
Comments requested PTI to clarify its Risk regarding Data Privacy Regulations. (NCSG, A19)	The IANA functions predominantly involve publishing open registers of allocations of public resources, and freely allowing duplication of these compilations to facilitate software interoperability and other related objectives. The nature and requirements of these allocations varies, but many involve publication of some elements of personal data, such as the identities of those to whom allocations have been made and relevant points of contact, and appointed persons who serve as 'designated experts' who adjudicate amendments to these registries. We note that the Internet standards process is based on high levels of transparency on contributions (https://www.ietf.org/privacy-statement/) and much of the IANA-related registry data is a consequence of these contributions. The organizations that set our policy, such as

	ICANN and the IETF, are largely responsible for grappling with issues pertaining to data privacy and for striking the appropriate balance in policy that is in compliance with applicable laws. However, as the operator that implements these policies, we need to continue to monitor this work, provide feedback to inform policy evolution, and to remain adaptable.
	We have identified this as a risk as privacy regulation continues to be an area of significant evolution in many jurisdictions. Should these evolve in a direction that compromises our ability to administer open and transparent coordination functions, it may impact our ability to fulfil our mission of enabling a global interoperable Internet in the manner we do today.
Commenter in support of goal 2.2, concerning key ceremony operation (RSSAC)	Thank you for the review and your support.

Comments on Business Continuity	Response
Commenters asked PTI to clarify how the COVID-19 pandemic impacted or will impact its Strategy & Operations. (RySG, BC)	Thank you for your feedback. The continued delivery of the IANA functions is core to ICANN's mission, and therefore the risk of PTI being materially impacted by financial changes due to global events such as COVID-19 is extremely low. The practical impact to our work is centered around our ability to effectively engage with our stakeholders in situations where travel is restricted. This is particularly evident in performing Key Signing Key Ceremonies which are heavily reliant on international travel and participation.
	Recognizing the impact of COVID-19 is likely to be long lasting, we made changes to the plan's Objective 2 by including a new targeted outcome: Policies and Procedures are adapted to ensure successful engagement and future operations despite long-term limits on travel due to COVID-19 pandemic and other similar events.
Commenters sought clarity on the risk of losing resources and the impact on PTI's ability to perform its work. (NCSG, A19)	The risk we identified in Objective 4: *PTI operating without enough spare resources to allow for cross-training and skill development leads to single points of failure and bottlenecks.*
	The work performed by PTI spans beyond policy implementation. Personnel is PTI's most important resource and therefore ensuring the team is

| | skilled, motivated, and have all of the necessary tools in place to perform and deliver the IANA functions is a key part of our commitment to our customers.

PTI seeks to anticipate need in advance, through monitoring of evolving policies and operational requirements, so that its resource needs can feed into ICANN and PTI's planning processes.

PTI works closely with ICANN throughout its Planning processes to ensure its FY21-25 Five Year ICANN Operating and Financial Plan; FY21 ICANN Operating Plan; FY21 ICANN Budget; and the FY21-FY25 Strategic Plans are aligned with the resource needs of the affiliate. |
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