

ICANN Organization’s Report of Public Comment Proceeding

Draft PTI and IANA FY21 Operating Plans and Budgets																			
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Section I: General Overview and Next Steps																			
<p>PTI (Public Technical Identifiers) was incorporated in August 2016 and became operational in October 2016. Under PTI’s Bylaws, draft Operating Plans and Budgets for PTI must be submitted to the PTI Board nine months before the start of each fiscal year. A draft Operating Plan and Budget for PTI for FY21 were presented to the PTI Board and ICANN Board Finance Committee for review and published for public comment on 14 October 2019.</p> <p>The FY21 PTI Operating Plan and Budget will be proposed for adoption by the PTI Board on 09 January 2020. As required under the PTI Bylaws, the PTI Operating Plan and Budget will also be presented to the ICANN Board as an input into ICANN org’s budget process and will also be the basis for the required IANA Budget. The FY21 IANA Operating Plan and Budget will be proposed for adoption by the ICANN Board at the end of January 2020.</p> <p>ICANN org and PTI use comments on draft planning documents to identify areas of strength and areas for improvement. Comments provided in this public comment proceeding will help identify specific changes that may be incorporated into the final budget documents and/or implemented in the next planning process. This analysis is part of our commitment to continuous improvement.</p> <p>Each year, ICANN org and PTI use 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 and PTI’s process of continuous improvement.</p>																			

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

Section II: Contributors

At the time this report was prepared, 6 communities and one individual posted comments to the forum. The following table lists these contributors in alphabetical order. Any quotations taken from contributor comments will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
GNSO Council	Terri Agnew	GNSO
ICANN At Large Advisory Committee	ICANN At-Large Staff	ALAC
ICANN Business Constituency	Steve DelBianco	BC
Non-Commercial Stakeholders Group	Rafik Dammak	NCSG
Registrar Stakeholder Group	Zoe Bonython	RrSG
gTLD Registries Stakeholder Group	Samantha Demetriou	RySG

Individuals:

Name	Affiliation (if provided)	Initials
Syed Iftikhar H. Shah	Individual	SS

Section III: Summary of Comments

General Disclaimer: This section intends to summarize broadly and comprehensively the comments submitted to this public comment proceeding but does not address every specific position stated by each contributor. The preparer recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

There were seven submissions to the public comment forum on the Draft FY21 PTI and IANA Operating Plans and Budgets. The comments were further broken down into a total of 32 individual comments and segmented by theme. Further analysis follows in the section below.

Many comments pertained to financial management or document structure on both the PTI and IANA documents. These comments provided suggestions for changes to improve readability and understanding. Other comments included those pertaining to general comment, level of detail provided in the documents, and strategic planning.

Comments have been separated thematically, and not based on the group submitting them, to gain a better understanding of the comments. The comment themes are listed here and the analysis

section provides a high-level assessment of the observations, questions, and requests. Responses to individual comments are provided in the appendix.

Themes

Financial Data and Format (18 Comments)

General (two Comments)

PTI Structure and Information (11 Comments)

Public Comment Process (one Comment)

Section IV: Analysis of Comments

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

Financial Data and Format

There were 18 comments submitted by five groups on various aspects of ICANN org's and PTI's expenses and data format.

General

Two comments were submitted in support and general acknowledgement of the PTI and IANA budget structure.

PTI Structure and Information

There were 11 comments submitted by six groups on various aspects of PTI Strategy and supporting details.

Public Comment Process

One comment was submitted in regard to the public comment process and format.

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1 Introduction

ICANN org and PTI published the Draft FY21 PTI and FY21 IANA Operating Plan and Budgets on 14 October 2019 for public comment. We received 32 specific comments from six community groups and one individual.

This document provides ICANN org and PTI's responses to the 32 comments submitted through the public comment process. These responses were organized into three relevant themes, which constitute the three sections that follow this Introduction and precede the Appendix. To more effectively address the comments, this document has adopted a new presentation format. This new format differs from the one used previously in the Staff Report of Public Comment on the FY20 PTI and IANA Operating Plan & Budget. Instead of displaying each question and each response in side-by-side columns, this document presents all of the questions in the Appendix. Responses, however, are featured in the three sections that immediately precede the Appendix and follow this Introduction. To find responses to submitted questions:

- Community organizations and individuals should first locate their organization name (or individual name) in the left-hand column (the Contributor column) of the Appendix.
- The middle column (the Question/Comment column) displays the comment submitted by the organization or individual. If an organization or individual submitted more than one comment, these are located sequentially in the middle column adjacent to the name of the organization or individual.
- The right-hand column (the Reference column) displays the section of this document that contains the response to the submitted comment.

ICANN org and PTI welcome and recognize the diverse participation from stakeholders as ICANN org and PTI's planning processes continue to evolve, including ICANN org's Strategic Plan, Operating Plan, Budget, and on-going operational and financial updates.

2 Financial Data and Format

ICANN org and PTI continually strive to provide more information in the published documents to enhance transparency and accountability. ICANN org and PTI will implement further controls and align formatting and style for future Operating and Budget Plans. ICANN org and PTI encourage input from the community for improvements to future iterations.

ICANN org and PTI acknowledge that changing the verbiage of the charts to indicate the change from one year to the other has been confusing. ICANN org and PTI will work to make it clear and concise in future publications. In reference to the Appendices in the Operating Plan and Budgets, ICANN org and PTI will revise footnotes for more clarity and insight for community members new to the PTI and IANA Operating Plan and Budget. ICANN org and PTI will also consider showing more cost details for the IANA Services expenses.

The FY19 actuals were \$2.1M under the FY19 budget. This variance was driven mainly by the open headcount for \$1.0M and the unused budgeted contingency for \$0.5M. Contingency is budgeted each year at a consistent amount in order to compensate for unforeseen and/or unallocated expenses

In the FY21 Draft PTI and IANA Operating Plans and Budget, an inflation rate of 3% was assumed for the personnel expenses growth over the FY20 budget. The incremental costs for personnel were offset by decreases in direct shared activities. Personnel levels will remain relatively flat as the program requirements for IANA are stabilizing.

IANA customers and the core maintenance of the Root Zone Maintainer System, as well as other IANA functions, are well accounted for in the budget and remain a priority. In addition, the IANA Budget remains flat to FY20 because 0.3 FTEs were reduced due to the program stability needing less personnel time, offset by incremental expenses for root zone maintenance. ICANN org and PTI will consider showing more details for the IANA Services expenses for clarity.

Areas of clarification:

1. In the Draft FY21 PTI Operating Plan and Budget, the financial table in section 4.1.1, is showing funding as an increase of \$0.1M over FY20.
2. In the Draft FY21 PTI Operating Plan and Budget, the financial table in 6.3 includes \$0.5M of contingency expense in Professional Services and \$0.3M of depreciation expenses in Admin. We will format the table going forward to be clearer.
3. Figures are shown in millions in order to maintain consistency with how the total ICANN org Operating plan and Budget is presented to the community.

3 PTI Structure and Information

3.1 Research and Development

PTI does not embark on significant research and development (R&D) efforts beyond the evolution of the work methods and systems to support operation of the IANA functions. These efforts are predominantly supported through personnel time, which is a component of the personnel costs presented. Pure research activities within ICANN org relating to unique identifiers is conducted by ICANN's Office of the Chief Technology Officer (OCTO) and that budget is presented to the community as part of the ICANN Operating Plan and Budget process. The work of OCTO and the outcomes of OCTO's research informs PTI operational decisions.

3.2 Root Zone Management

ICANN org and PTI do not foresee any material impact on PTI and IANA costs for FY21 due to implementation of RSSAC 037 and RSSAC 038. ICANN org and PTI will continue to monitor that activity for future budget impact and note that there is likely budgetary impact elsewhere in ICANN org. There are no foreseen material costs for IANA and PTI in implementing changes to the root server operators.

3.3 Strategic Planning

The PTI Board is actively developing a multi-year strategic plan that it intends to present to the community in 2020. This follows an interim period by which the IANA Transition documents along with the contracts for performing the IANA functions formed the basis of the PTI strategy. Additionally, PTI's work resides under one of ICANN's strategic goals in ICANN's FY21-FY25 Strategic Plan, to "Continue to deliver and enhance the IANA functions with operational excellence." The development of a PTI strategic plan will indicate more clearly the duration of projects and programs.

ICANN org and PTI acknowledge that the GNSO council New gTLD Subsequent Procedures Policy Development Process Working Group is currently developing policy that may lead to changes to the existing Introduction of New Generic Top-Level Domains policy recommendations from 8 August 2007 as well as the Applicant Guidebook dated June 2012.

3.4 Structure and Naming

Terminology used in the operating plan and budget is derived from the various contracts and documents that govern the business activities of PTI. ICANN org and PTI work to adhere to this terminology accurately to be faithful to these community agreed documents, which may come at the expense of clarity. In addition, the term “IANA” has limited allowable usages under the IPR agreements that govern its use. ICANN welcomes identifying ways of adding clarity to the presentation that does not contradict these governing documents.

ICANN org and PTI note the confusion referring to “thematically aligned activities” in section 4 of the Operating Plan and Budget and will review to improve the language and clarity.

4 Public Comment Process

ICANN org and PTI are continually revising and assessing how best to utilize the public comment process. ICANN org and PTI acknowledge that a more interactive question format may be more beneficial to the community and will review the feasibility of adding this functionality to future public comments.

5 Appendix – Contributor Question/Comment and Reference to Response

5.1 List of Public Comments Received

Contributor	Question / Comment	Reference
RySG gTLD Registries Stakeholder Group	The FY21 budget is fiscally prudent in that it is forecast to only marginally exceed the FY20 forecast. This is welcomed by the RySG.	Section 2: Financial Data and Format
RySG gTLD Registries Stakeholder Group	The FY21 budget as presented represents (US\$10.6m) a marginal increase on FY20 and therefore appears to be fiscally prudent; this is generally welcomed by the RySG. That said, the FY20 forecast of US\$10.5m represents a significant uplift on the FY19 actuals (US\$7.9m) so the apparent prudence of FY21 needs to be seen in that context. Further detailed explanation on the underspend in 2019 and why this cannot be retained would be helpful.	Section 2: Financial Data and Format
ICANN Business Constituency (BC)	While it was noted that the PTI Budget of \$10m is an increase of only 1% of the preceding year’s budget (\$9.9m) due to inflation with respect to personnel compensation, the BC for transparency purposes requests that the comparative inflationary rate in view should be indicated.	Section 2: Financial Data and Format
ICANN Business Constituency (BC)	Furthermore, looking at the table below in “Funding” row and “Under/(Over)” column: The BC desires clarity on whether an increase of \$100,000 over the FY20 budget for FY21 Budget should be classified as a decrease rather than an increase	Section 2: Financial Data and Format
ICANN Business Constituency (BC)	The BC also seeks clarification on the use of the Contingency funds identified in this table. We note that while there is no increase anticipated from FY20 to FY21, FY19 provided no funding in this area. Since it represents \$500,000 of the PTI budget, we request details on how the Contingency was used in FY20 that warrants continued allocation for the coming year.	Section 2: Financial Data and Format

Contributor	Question / Comment	Reference
ICANN Business Constituency (BC)	Comparing the above table to the one provided in Section 6.3 below, BC also requests clarification of expenses for Professional Services and for Admin, which differ. We surmise that the table folds Contingency and Deprecation into these categories, but it would be helpful to have this identified so that the two tables do not conflict.	Section 2: Financial Data and Format
ICANN Business Constituency (BC)	The BC noted that the IANA FY21 Budget sum of \$600,000 is flat compared to that of FY20. We ask why is there no inflationary effect on that cost, noting that personnel are also involved?	Section 2: Financial Data and Format
ICANN Business Constituency (BC)	As a general note, the BC would like to compute the budgets to arrive at the percentage values indicated and would therefore like to have access to the raw data from which computations were made. Or as an alternative, base data could be provided up to 2 or 3 decimal points. Based on the data provided, we should also be able to verify the computational results indicated without any assumptions.	Section 2: Financial Data and Format
GNSO Council	While it was noted that the PTI Budget of US\$10m is an increase of only 1% of the preceding year's budget (US\$9.9m) due to inflation with respect to personnel compensation, for transparency purposes, it would be appropriate to indicate the comparative inflationary rate utilized.	Section 2: Financial Data and Format
Non-Commercial Stakeholders Group (NCSG)	NCSG strongly supports the continued maintenance of the PTI budget to ensure continuity of service in the IANA functions. The flat year on year approach of the FY21 budget is acceptable to NCSG as long as the IANA customers and the core maintenance of the RZMS and the other IANA functions are sufficiently accounted for in the FY21 budget.	Section 2: Financial Data and Format
Non-Commercial Stakeholders Group (NCSG)	NCSG would look favourably on increasing the precision of the numbers presented in future budgetary documents. Indeed, irrespective of accounting standards, a comparatively small budget of 10 millions USD would in our view require rounding up to no more than the closest 10 000. We formulated a similar comment last year and it appears it was not taken into consideration in the preparation of the FY21 budgets	Section 2: Financial Data and Format

Contributor	Question / Comment	Reference
Non-Commercial Stakeholders Group (NCSG)	In addition, several elements of the two documents under comment here are presented without definitions, explanations or in a generally obtuse way. As a not-for-profit organization accountable to its community, it is paramount that ICANN deploys the required efforts in order to properly enable that community to inform itself, produce comments and generally engage the organization on issues it deems important. This is especially important when such information is of a more technical nature, like in the case of accounting or quantitative information. This is not about simply finding the right amount of details to include in disclosure documents, but also about presentation, which is paramount when it comes to quantitative information.	Section 2: Financial Data and Format
Non-Commercial Stakeholders Group (NCSG)	In our comment on last year’s operating plans and budgets, we made similar comments on the importance of presentation and definitions. No visible improvements were made. In addition, new obfuscating elements have found their way in this year’s budget documents, decreasing further their intelligibility and in doing so the capacity of the community to engage	Section 2: Financial Data and Format
Non-Commercial Stakeholders Group (NCSG)	Footnote (a) of Appendix A and B cannot be understood without precise knowledge of the context of the transition of IANA from ICANN to PTI as well as the numbering of Section 5.1 in the IANA Budget. NCSG is happy to work further with the relevant persons and departments of ICANN org to find ways to improve the accessibility of future budgetary documents while meeting ICANN org’s objectives of uniform presentation.	Section 2: Financial Data and Format
Non-Commercial Stakeholders Group (NCSG)	Moreover, it also appears that this year’s draft budget tables (e.g. Appendix A and B of the draft IANA budget) were changed in two ways. First, the replacement of the terms “increase” and “(decrease)” by “under” and “(over)” respectively, as well as the addition of an extra under/over column on the right of FY19 actuals. NCSG deplores both of these changes and would suggest reverting to what was done in the FY20 document.	Section 2: Financial Data and Format
Non-Commercial Stakeholders Group (NCSG)	Even for those familiar with the accounting parenthetical notation, the terms “over” and “under” most likely remain equivocal. It is possible to make sense of them, but it does require knowledge of accounting. Without that knowledge, one may not understand that it is the budget numbers which are understood to be “over” or “under” either the forecast or actuals. This issue is compounded by the fact that the basis for the over/under comparison for actual is	Section 2: Financial Data and Format

Contributor	Question / Comment	Reference
	not even given. Usage of “increase” and “decrease” more directly implied that what is planned (next FY budget) is an increase or a decrease over the more certain numbers (the current FY forecast or the actuals for the previous FY). It does not suffice that one may understand the meaning of “over” and “under” by looking at the numbers and reasoning by induction. The meaning of these two terms should be obvious without looking at the numbers, and for now it is not	
Registrar Stakeholder Group (RrSG)	However, the RrSG notes that although there is only a modest budget increase in FY21, there is a significant increase from the PTI services FY19 actuals of 7.9 million to the FY21 budget of 10 million, the bulk of which is coming from personnel costs. This is questionable given the headcount is actually going down between 2020-21 (albeit following an increase in 2019-20). The RrSG recognises that there is already a commitment to these personnel, but we would now expect the personnel budget to remain stable over the next 3 years, as no further changes should be required. Likewise, the decrease in budgeted administration costs shown from FY20-21 should also continue now that the department is fully established.	Section 2: Financial Data and Format
Registrar Stakeholder Group (RrSG)	Finally, for the sake of transparency, the RrSG would like to see a better breakdown of the budget for the IANA services. Although notably smaller than the PTI services budget, there should still be more information provided on how the 0.6 million is allocated	Section 2: Financial Data and Format
GNSO Council	The GNSO, as a Decisional Participant within the Empowered Community, recognizes that arms-length separation of ICANN and PTI is important and that should any of its constituent parts have issue with the IANA/PTI budget, it is the PTI-IANA Operating Plan and Budget that would be subject to possible rejection petition should that occur.	Thank you for your feedback and we acknowledge your comment
GNSO Council	The GNSO Council noted PTI’s expectation in FY21 to deliver a comprehensive set of systems and tools to support protocol parameter assignment workflows following a multi-year development effort. This is a welcome development and it is GNSO Council’s expectation that PTI will continue to focus on service improvement as a culture.	Thank you for your feedback and we acknowledge your comment

Contributor	Question / Comment	Reference
Individual	<p>The proposed budget is the same as the previous year. However, I am unable to see the budget for the PTI R&D activities and budget to create awareness on PTI functions among the global community. I think these both components are important for PTI better services and to get handsome feedback from the global community on PTI related matters including its PDP processes. I proposing that there may be some budget for the PTI R&D activities and to create awareness about PTI functions among the global community.</p>	Section 3: PTI Structure and Information
ICANN at Large	<p>In August of this year, community comment was requested regarding the evolution of the Root Zone Management System, based on RSSAC 037 and RSSAC 038. The ALAC provided a statement in response to the ICANN Public Comment on Evolving the Governance of the Root Server System accordingly. This evolution involves a big change in the governance of the Root Server System. But these changes are not reflected in the proposed PTI and IANA FY21 Operating Plan and Budgets. Did these changes have any consequences (short, medium or long term) to the PTI and IANA Operating Plan and Budgets? Do ICANN, PTI and IANA need to be prepared to take on an additional Root Server?</p>	Section 3: PTI Structure and Information
RySG gTLD Registries Stakeholder Group	<p>The budget as presented is lacking in underlying detail and any apparent linkage to a strategic plan and this makes it difficult to comment in substantial detail on any of the key areas of expenditure.</p>	Section 3: PTI Structure and Information
RySG gTLD Registries Stakeholder Group	<p>Review of the budget as presented presents a challenge to a third party seeking to comment. For example, Section 4 provides clear and useful descriptions of the activities carried out in various areas of work. But there are no questions posed to anyone commenting or indications of the choices or compromises being made. Absent such information, it is challenging for a commenter to provide substantial or material input. While the RySG is not be asked to approve the budget as such, if we were being asked to do so, we would find that difficult to do with this limited level of detail. The RySG appreciates that the PTI budget process necessitates that this budget is for a reasonably long time ahead and therefore it is challenging to provide some of the details. But, recognising the obvious constraints, alternatives to the current presentation should be considered. The development and socialisation of a longer</p>	Section 3: PTI Structure and Information

Contributor	Question / Comment	Reference
	<p>term view - a strategic plan for the IANA services - and the linkage of such a plan to the budgets may help here.</p>	
<p>RySG gTLD Registries Stakeholder Group</p>	<p>Fiscal prudence is only one parameter and, should the IANA services require investment, the RySG would welcome the opportunity to understand and comment on what investment may be required. To this extent, the RySG welcomes interaction with the IANA staff and, potentially, a more interactive style of budget. For example, the budget as presented could offer more than one option for investment. Such an approach could offer two or even three options along the lines of a base budget, a development budget and an investment budget that the community could comment on. We anticipate that users of the IANA services may find such an approach particularly helpful in facilitating more detailed and interactive community comment and input.</p>	<p>Section 3: PTI Structure and Information</p>
<p>ICANN Business Constituency (BC)</p>	<p>The BC notes PTI's expectation in Fiscal Year (FY) 21 to deliver a comprehensive set of systems and tools to support protocol parameter assignment workflows following a multi-year development effort. This is a welcome development and it is BC's expectation that PTI will continue to focus on service improvement as a culture. As an improvement, the BC would like PTI to indicate the expected end of similar projects going forward. Projects and Programs should have start dates and proposed end dates which are subject to change based on management approval. The idea behind this is to avoid unending/unpredictable multi-year efforts. Once the project/Program is completed, it can be absorbed into the general day-to-day activity as part of "business as usual".</p>	<p>Section 3: PTI Structure and Information</p>
<p>GNSO Council</p>	<p>The GNSO Council notes that one of our current policy development activities does potentially intersect with the operations of the IANA Functions by PTI. The New gTLD Subsequent Procedures Policy Development Process Working Group is currently developing policy that may lead to changes to the existing Introduction of New Generic Top-Level Domains policy recommendations from 8 August 2007 as well as the final Applicant Guidebook dated June 2012. This may ultimately lead to ICANN instructing PTI to place new gTLDs into the root. However, it is not anticipated that delegations would occur in FY21.</p>	<p>Section 3: PTI Structure and Information</p>

Contributor	Question / Comment	Reference
GNSO Council	As an improvement, the GNSO Council would recommend that PTI provide more details on such improvements and could also indicate the expected end date of similar projects going forward. Projects and programs should have start dates and proposed end dates which are subject to change based on management approval. The idea behind this is to avoid unending/unpredictable multi-year efforts. Once the project/program is completed, it can be absorbed into the general day-to-day activity as part of what is called “business as usual”.	Section 3: PTI Structure and Information
GNSO Council	The budget as presented is lacking in underlying detail and any apparent linkage to a strategic plan and this makes it difficult to comment in substantial detail on any of the key areas of expenditure. Given that the process necessitates that this budget is for a reasonably long time ahead and it is clearly challenging to provide some of the underlying details but, recognizing this, alternatives to the current presentation should be considered.	Section 3: PTI Structure and Information
Non-Commercial Stakeholders Group (NCSG)	Naming conventions - there is no standard usage of terms, and it appears several terms overlap each other, at least partially or completely (“Core IANA Services”, “IANA Services”, “PTI Services”, “PTI O&B”, “Contract Oversight and Auxiliary Services”) This makes reading and understanding difficult, if not outright guesswork. NCSG would strongly recommend the usage of defined terms, with one single term per item or concept, as is common practice in the professional services industry, with an appendix giving a list of definitions.	Section 3: PTI Structure and Information
Non-Commercial Stakeholders Group (NCSG)	Relationship between ICANN, IANA and PTI - these are three different entities (or group of “functions,” as far as IANA is concerned) which are easily confused. While the boxes visual is a helpful aid, the variation in language across the document undermines the usefulness of that aid. Moreover, under section 4 of the IANA budget, it is mentioned that PTI is divided in “two groups of thematically aligned activities”. However, what follows is a list of four elements, which is found nowhere else the tables or in the text of the document. NCSG would strongly recommend an individual explanatory section, which would contain both a visual and text, both using the standardized vocabulary recommended above.	Section 3: PTI Structure and Information

Contributor	Question / Comment	Reference
RySG gTLD Registries Stakeholder Group	The format is a statement of the budget as planned. Community input and comment may be better facilitated by the authors providing specific questions around key expenditure for community input and comment.	Section4: Public Comment Process