

Staff Report of Public Comment Proceeding

ICANN Strategic Plan for Fiscal Years 2021 – 2025

Publication Date: 29 March 2019

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Public Comment Proceeding

Open Date: 20 December 2018

Close Date: 25 February 2019 (extended from 11 February 2019)

Staff Report Due Date: 11 March 2019 (extended from 25 February 2019)

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Section I: General Overview and Next Steps

On 20 December 2018, ICANN organization opened a public comment forum on a draft ICANN Strategic Plan for fiscal years 2021 to 2025. Considering the end-of year holidays and office closure, deadline for comments was set to 11 February, and was then extended by two weeks, representing a 67-day public comment period in total.

The draft includes a proposed new vision of the future state of ICANN, and a proposed set of strategic objectives and goals, along with desired outcomes and associated risks for the next five years.

Strategic planning is a fundamental part of ICANN's governance, mandated by the organization's Bylaws. The ICANN 5-year strategic plan is a core element of ICANN's three-fold planning process cycle, along with a 5-year operating plan, and the annual operating plan and budget. Strategic planning sets a direction towards a desired future ("the vision") and lays out the critical outcomes and specific accomplishments identified as necessary to successfully serve ICANN's mission and fulfill the vision.

To prepare for the development of this plan, ICANN initiated a process to identify internal and external trends that impact ICANN's future, its mission, or operations. The ICANN community, Board, and ICANN org all provided extensive input to this effort. During the ensuing months, the ICANN Board assessed the impacts of these five primary trends, including an evaluation of the associated Strengths, Weaknesses, Opportunities and Threats (SWOT analysis). The result of that work was reflected in this draft strategic plan.

At ICANN64 in Kobe, the community, the organization and the ICANN Board discussed the current draft, the comments received, and the strategic planning process during a high-interest [open session](#). Fourteen individuals made one or more comments during the session.

The Strategic Planning Board caucus group and ICANN organization will incorporate feedback from this public comment proceeding, as well as the comments received at ICANN64, into a revised document. The final document will be presented to the ICANN Board, with the aim of Board adoption in May / June 2019.

Section II: Contributors

At the time this report was prepared, a total of fifteen (15) community submissions had been posted to the forum. The contributors, both individuals and 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
Regional Internet Registries	Alan Barrett, NRO Chair	RIRs
SOPC Strategic and Operational Planning Committee (SOPC)	Giovanni Seppia	SOPC
At-Large Advisory Committee	ICANN Policy Staff in support of the At-Large Community	ALAC
gTLD Registries Stakeholder Group	Samantha Demetriou, RySG Vice Chair, Policy	RySG
Registrar Stakeholder Group	Zoe Bonython, RrSG Secretariat	RrSG
GNSO Council	Berry Cobb, GNSO Policy Consultant	GNSO Council
ICANN's Business Constituency	Steve DelBianco	BC
ICANN Governmental Advisory Committee	Robert Hoggarth, ICANN – Policy Development and GAC Relations	GAC
Non-Commercial Stakeholders Group	Rafik Dammak	NCSG
At-Large Advisory Committee	ICANN Policy Staff in support of the At-Large Community	ALAC

Individuals:

Name	Affiliation (if provided)	Initials
Larry Masinter	-	LMM
Larry Masinter	-	LMM
James Gannon	-	JAG
Chokri Ben Romdhane	-	CBR
Mark Svancarek (CELA)	Business Constituency	MSV

Individuals who commented during the ICANN64 session:

Name	Affiliation (if provided)	Initials
Julie Hammer	SSAC	JUL
Wolf-Ulrich Knoblen	ISPC (Internet Service Providers Constituency)	WUK
Alan Greenberg		ALG
Elsa Saade		ELS
Kavouss Arasteh		KAA
John Curran	ARIN / NRO	JOC
Donna Austin		DOA
Vivek Goyal		VIG

Name not transcribed		NNT
Lori Schulman		LOS
Barrack Otieno	SOPC Strategic and Operations Planning Committee	BAO
Roelof Meijer		ROM
Stephanie Perrin	NCSG	STP
Marilyn Cade		MAC

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).

General comments

Commenters broadly supported the draft strategic plan and acknowledged that this plan was created with the input of community members.

The BC noted that *“Strategic Objectives result from a diligent outreach and information gathering process, and generally supports objectives that are surfaced with this level of rigor and diverse input.”*

The GAC acknowledged *“the effort of all ICANN communities to participate in this strategic planning effort.”*

The GNSO council indicated being *“broadly comfortable with the five trends that have been identified.”*

The RySG *“at a high level supports both the proposed Vision for ICANN and the five overarching Strategic Objectives.”*

Strategic Planning process

Some questions were raised on the process that was followed to develop the plan, and the methodology that was adopted for prioritizing strategic goals, and for identifying outcomes and risks.

JAG commented that *“the strategic plan is lacking some of the core aspects of strategic plans such as basic analysis, PESTER/SWOT, and that there is a strong lack of strategic narrative across the document.”*

The SOPC indicated that *“a strong logical chain from the Targeted Outcomes to the Strategic Goal is not always apparent.”*

The RySG *“believe that the plan requires more detail about how the objectives will be achieved, as well as how the plan will be costed and ultimately integrated with the financial planning cycle.”*

The RySG also underlined the importance to have a clear and transparent process in place for adapting the Strategic Plan, if needed, as ICANN goes through the cycle.

At ICANN64, several individuals questioned how progress would be measured towards achieving the strategic goals, and how the plan would be updated to adjust to changes.

Introduction

The BC, SOPC, GNSO Council, and NCSG commented on the usage and absence of definition of the notion of 'global public interest'.

The SOPC mentioned that *"in the absence of a specific interpretation of the concept of 'global public interest', it would be wise to refrain from its usage or have it be accompanied by strictly-defined qualifications."*

The GAC suggested that the *"role [afforded to GAC members and observers to contribute to the development phase of the initial draft strategic plan] be clearly acknowledged in the new Strategic Plan for 2021-2025."*

Vision

The SOPC, GNSO Council, and NCSG commented on and supported the new vision statement, and requested or suggested some edits.

The NCSG agreed *"that updating the vision statement (in italics below) post IANA transition is necessary, but we do request changes in some instances."*

The SOPC noted that *"what seems to be missing is a reference to the notion of stewardship."*

Mission

The SOPC, RrSG, BC and NCSG all noted that the mission of ICANN had not been changed and supported this decision.

The RrSG welcomed *"ICANN restating that it shall not act outside of its mission (b) and shall be held accountable to its mission statement. Additionally, as is stated in (c), it's important to have reiterated that ICANN is not a regulator."*

Security

Commenters broadly agreed with the proposed strategic objective, goals, targeted outcomes and risks.

The ALAC *"agrees this should be the primary strategic objective for ICANN and strongly supports the four strategic goals 1.1 to 1.4 as listed in the draft strategic plan."*

Goal 1.1:

SOPC *"would appreciate a definition of 'DNS stakeholders'."*

JAG suggested *"reworking the outcomes and risks to have planer language."*

Goal 1.2:

JAG indicated that *"the association of DNSSEC deployment and alternative roots is not grounded in any strong factual basis that I am aware of. Alt roots are certainly an area that needs to be tracked and root server cooperation is important however the strategic risks associated with 1.2 should be revisited."*

The SOPC suggested that the last risk be updated to read *'The lack of an accountable collaborative private-sector-led governance structure could lead to insufficiency in DNS root service, potentially encouraging certain actors to attempt to develop alternative DNS root services'.*

Goal 1.3:

The RrSG noted: *“Whilst the RrSG welcomes this focus, we would be interested to know how ICANN intends on engaging with the registrars and DNS stakeholders to understand and mitigate the mentioned security threats.”*

Goal 1.4:

The SOPC suggested *“merging the two foremost Targeted Outcomes.”*

JAG agreed that *“more strategic focus on the KSK and KMF processes is appropriate. Close integration of this area with the RZM is extremely important, I suggest that a separate paper on this topic is likely warranted to define the RZM and Root Zone Key strategy for the same time period due to the tri party arrangement (ICANN, PTI, VRSN).”*

Governance

Commenters broadly agreed with the proposed strategic objective, goals, targeted outcomes and risks.

The GNSO Council noted they *“support this objective and have taken our own steps in 2018 and early 2019 to develop “PDP 3.0 Recommendations” for improved efficiency and effectiveness of the Council in managing the GNSO Policy Development Processes.”*

The SOPC noted that: *“It is hard to distinguish the difference between Strategic Goals 2.1., 2.2., and 2.3.”*

Goal 2.1:

CBR questioned why outcome 4 was *“limited to policy development cross-community working groups should also care about technical and financial aspects.”* He also noted on the first three outcomes that *“the most crucial item is the identification of real and elementary community needs based on bottom up Model which will help to reach consensus about new processes in acceptable duration.”*

ALAC believe that *“all groups should be adequately resourced to enable them to do the work they are charged to do,”* and suggested an *“iterative revisiting of priorities for reviews, policy development and decision-making.”*

The RrSG asked *“How does ICANN intend to achieve the seemingly competing goals of increasing diversity and capacity across all parts of its ecosystem and ensuring that work gets done and policies are developed in an effective and timely manner?”*

At ICANN64, WUK suggested to include goals towards improvements of Organizational and Specific Reviews. ELS underlined the developments of PDP 3.0 already underway, and the work on anti-harassment.

Goal 2.2:

ALAC wished to underline *“the need to be aware of the tradeoffs involved when we seek to introduce cost efficiencies while protecting the principles of accountability and transparency.”*

ALAC also underlined the need to acknowledge *“the link between strengthening the multistakeholder decision making process and the financial ability of SO/ACs, RALOs and other partners to participate.”*

CBR noted as an outcome to *“ensure that SO and ACs members are effectively representative of their respective communities.”*

The GAC *“believes that the second strategic goal would be bolstered by specifically mentioning the contribution of policy advice in the multistakeholder decision making process.”*

The RrSG indicated it is *“concerned by the use of policy development as a means to push for a singular view or outcome.”*

Goal 2.3:

The GNSO Council, and NCSG noted the goal could be strengthened by a small change, noting the *“importance of ‘informed’ policy making.”*

CBR proposed as an outcome to *“review the model to reduce decisions making cycle duration by engaging real and more specific community representative stakeholder to avoid fictive stakeholder.”*

CBR also proposed to *“activate the Review of Geographic Regions process to give the opportunity for emerging regions to have their own AC or SO structures Review membership process of some technical AC such SSAC and RSSAC in order to guarantee balance of regional representation in addition of technical skills.”*

ALAC suggested to *“rebalance input at Board level”* by adding a second ALAC-nominated Board member.

RrSG questioned *“How does ICANN intend to accelerate policy development when there is a recognized burn-out of participants?”*

The GAC indicated it was *“important that completion and delivery of the ITI be a featured part of the strategic plan implementation.”*

Unique Identifier System

While most commenters agreed with the proposed strategic objective and goals, JAG & NCSG indicated that goal 3.3 should be removed, and BC noted that goal 3.4 seemed inconsistent with the rest of the section.

The RIRs requested that goals 3.1, 3.2 and 3.3 be amended *“to reflect that work on these goals with respect to Internet Number Resources should be coordinated with the RIRs.”*

The RrSG *“would like to see ICANN looking outside its traditional areas of operation. Potentially, ICANN could play a useful role in coordinating (for example) unique identifiers to the IoT that would guarantee universal resolution. [...] The RrSG also believes that allocation of funds to this work would be an appropriate use of auction proceeds.”*

Goal 3.1:

LMM indicated that *“the current focus on TLD selection in ICANN priorities for IDN development should be expanded to include a focus on other barriers to actual USE of IDNs embedded in other globally unique identifiers, including email addresses and URLs.”*

On IPv6, JAG noted that *“ICANN should and must have a more defined strategic goal on its expected future investments vs pushing further adoption via 3rd parties.”*

At ICANN64, several commenters welcomed the focus on IDNs, and DOA proposed a consumer awareness campaign in support of the adoption of IDNs.

Goal 3.2:

JAG, GNSO Council, and NCSG all underlined the necessity to define the notion of emerging technologies.

CBR suggested to *“focus on Academia in less technology developed country in order to spread basic knowledge and to give the opportunity to community to join Universal Acceptance efforts,”* and to *“encourage collaboration between countries of the same region by sharing mutual success experience.”*

SOPC recommended to revise the risks to be more relevant to the goal.

Goal 3.3:

LMM suggested to invest to improve the usability of IANA registries.

JAG & NCSG indicated that this section should be moved out of this plan, to a document specific to the IANA function.

Goal 3.4:

The SOPC found it *“would be logical to complement the list of Outcomes with the statement, ‘The new round of gTLD is a success, with their maxim possible proportion delegated to the root and sustain operation and consistent expansion thereafter.’”*

The GNSO Council *“acknowledges the Targeted Outcomes and Risks, but can only accept this outcome subject to the satisfactory completion of relevant policy development work first being undertaken.”*

JAG noted that *“the outcomes for this section are statement of fact or hope, with no SMART aspects, this section needs to be rewritten to be actual objectives in order to be operationalized.”*

The BC indicated that *“Strategic Goal 3.4 concerning new gTLDs seems tactical and not strategic, and not consistent with the level of import of other points in this section.”*

At ICANN64, VIG suggested that this goal include the execution of new rounds, and not just the planning.

Geopolitics

Commenters broadly agreed with the proposed strategic objective, goals, targeted outcomes and risks.

The BC noted that *“ICANN appears at risk of being marginalized by governments and organizations that wish to increase their influence over internet policy, as evidenced by policies originating out of the EU, China, and Russia. If ICANN truly wants to be a ‘Champion’ of the open internet it surely needs to retain or regain its footing on the global stage.”*

SOPC believe that *“ICANN could (and should) collaborate more with country code registries to gain information and approaches on issues that begin nationally but have the potential to grow wider.”*

“At-Large believes the multistakeholder process is worth fighting for, as it represents a governance model reflective of the original values around which the Internet was originally conceived – bottom-up and inclusive. The importance of the public interest in this process - and which is rightfully the responsibility of the entire ICANN community - cannot be overestimated.”

JAG commented on both goals 4.1 and 4.2 that *“If this goal is to be achieved it needs to be understood that this function and goal needs to be targeted by professionals as their core responsibility.”*

Goal 4.1:

CBR noted that it would be *“less expensive if ICANN acquire the ability to adopt its mission and activities according to some local, regional legislations.”*

“The RrSG welcomes a more proactive approach. The community can certainly be used as an early warning system, but ICANN must be prepared to listen rather than react when it is essentially too late.”

Goal 4.2:

The GNSO Council *“recognize the value of a deep and informed pool of volunteers that will contribute to GNSO policy development activities.”*

At ICANN64, BAO recommended more collaboration with country code top-level domain registries to highlight best practices.

Financials

While most commenters broadly agreed with the proposed strategic objective, goals, targeted outcomes and risks, The BC suggested that *“this Objective be re-worded to reflect only Goal 5.2, and possibly 5.3.”*

The SOPC indicated that *“considering ICANN’s age, [these three goals] are slightly alarming. One would expect such goals in a start-up/scale-up phase, but not in a mature, multimillion organization.”* They also noted that *“ICANN should not only consider its income and expenses but should also be very restrictive with regard to new engagements that involve financial support.”*

The RrSG commented that *“a balance between income growth and realistic expenditure must be sought and the community must do more to limit reliance on ICANN’s cash.”*

Goal 5.1:

CBR suggested to *“seek alternatives in the region where the DNS market outcomes is down.”* *“The ALAC would like to see more analysis on this topic, more specifics on what ICANN is planning to do in this area.”*

The NCSG and GNSO Council noted that *“market trends are only relevant insofar as they overlap with the current mission of ICANN.”*

At ICANN64, LOS mentioned that this goal was too vague, and needed to be clarified.

Goal 5.2:

The NCSG indicated that *“these [outcomes] should not impact the community first, and efforts should be shared by all, including ICANN staff and the Board.”*

ALAC noted that *“ICANN Org must continue to make other positive efforts to address maintaining an agreed level of Reserve Funds, such as adjustments where essential to expenditure and in budgeting and of course continuing to make regular contributions.”*

ALAC also suggested that *“conflicts about resource allocation be addressed and resolved in a process that engages the wider ICANN community.”*

ALAC finally *“strongly believes that ICANN’s strategic priorities and goals must drive resource allocation, not the other way around, and that the maintenance and development of ICANN’s unique multistakeholder system must be primary among those priorities and goals.”*

Goal 5.3:

JAG commented that *“this objective seems at odds with itself. ICANN needs to become more agile and flexible, however a move to a 2-year planning cycle is proposed. I would in fact suggest the opposite, design more agile planning methods to move to an agile strategic management plan where financial changes can be processed within a less than 12-month timeframe.”*

Section IV: Analysis of Comments

General Disclaimer: This section intends to provide an analysis and evaluation of the comments submitted along with explanations regarding the basis for any recommendations provided within the analysis.

The 15 submissions received through the public comment proceedings, and the 20 comments made at ICANN64 were broken down into 172 comments, which cover the following topics as follows:

	Total	# of comments expressing support	# of comments expressing support, but with edits	# of comments indicating concerns	# of other comments or suggestions
Total # of elementary comments received	172	53	43	7	69
General comments	21	8	1		12
Introduction	5	1	2		2
Vision	15	8	5		2
Mission	4	4			
#1 - Security	19	6	9		4
#2 - Governance	37	9	8		20
#3 - Unique Identifier System	32	3	15	5	9
#4 - Geopolitics	20	8	3		9
#5 - Financials	19	6		2	11

A transcript of the public session held at ICANN64 can be found [here](#).

As a next step, ICANN organization and Board will incorporate feedback from this public comment proceeding and from ICANN64 discussions, into a revised document.

The determination of changes to be made to the strategic plan document is currently under way. Details of how each comment received was considered in the revised plan will be added to this report once the strategic plan has been finalized.

The revised document will be presented to the ICANN Board, with the aim of Board adoption in May / June 2019.