Public Comment Summary Report

ICANN Draft FY23–27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget

Open for Submissions Date:
Tuesday, 7 December 2021

Closed for Submissions Date:
Monday, 7 February 2022

Summary Report Due Date:
Wednesday, 30 March 2022

Category: Operations

Requester: ICANN organization

ICANN org Contact(s): planning@icann.org

Open Proceeding Link:
https://www.icann.org/en/public-comment/proceeding/draft-fy23-27-operating-and-financial-plan-and-draft-fy23-operating-plan-and-budget-15-09-2021

Outcome:
The ICANN organization (org) received submissions from six community groups, which consist of 100 comments about the Draft FY23–27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget. The comments are categorized into six themes: document structure, operating plan, operating initiative plan, functional activity plan, financial management and other. The Public Comment summary report includes ICANN org's response to the submission. All received comments will be taken into consideration, and where appropriate and feasible, incorporated into the Revised Draft FY23–27 Operating and Financial Plan and Revised Draft FY23 Operating Plan and Budget, prior to ICANN Board adoption consideration.

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Section 1: Scope of Comments

On 7 December 2021, ICANN org published the Draft FY23–27 Operating and Financial Plan and the Draft FY23 Operating Plan and Budget for Public Comment. During the Public Comment period, two community webinars about these draft plans took place on 8 and 9 December 2021. The ICANN org planning team was also invited to several community group meetings where the team further discussed and engaged with those community members on the draft plans.

ICANN org received submissions from six community groups. From those submissions, ICANN org identified 100 specific comments covering six different themes. This report's Appendix includes all comments and corresponding responses. Two submissions were received after the deadline. From these two late submissions, ICANN org identified 21 comments listed separately in the Appendix, along with a reference to a response.

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.

This report includes ICANN org's response to the comments received through the public comment process. The Revised Draft FY23–27 Operating and Financial Plan and Revised Draft FY23 Operating Plan and Budget will be presented to the ICANN Board for adoption consideration at a Board meeting in May 2022.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
At-Large Advisory Committee	ICANN Policy Staff in support of the At-Large Community	ALAC
ccNSO Strategic and Operational Planning Committee	Andreas Musielak	ccNSO SOPC
Generic Names Supporting Organization Council	Philippe Fouquart	GNSO
gTLD Registries Stakeholder Group		RySG

Section 2a: Late Submissions

ICANN org accepted two late submissions, which have been appended to this summary report.

Organizations and Groups:

Name	Submitted by	Initials
ICANN Business Constituency	Tim Smith, Lawrence Olawale-Roberts, Jimson Olufuye	BC
Registrar Stakeholder Group	Zoe Bonython	RrSG

Section 3: Summary of Submissions

There were six submissions to the Public Comment proceeding on the Draft FY23–27 Operating and Financial Plan and the Draft FY23 Operating Plan and Budget. The six submissions were further broken down into 100 comments. To better understand the comments, they have been grouped into themes and are listed below. Section 4 of this report contains the summary response of the comments received. All comments received are provided in the Appendix. All comments received by the submission date are also available on the Public Comment page.

Other 3.0%
Operating Plan 6.0%
Operating Initiatives 22.0%
Functional Activities 24.0%
Document Structure 13.0%
Financials 32.0%
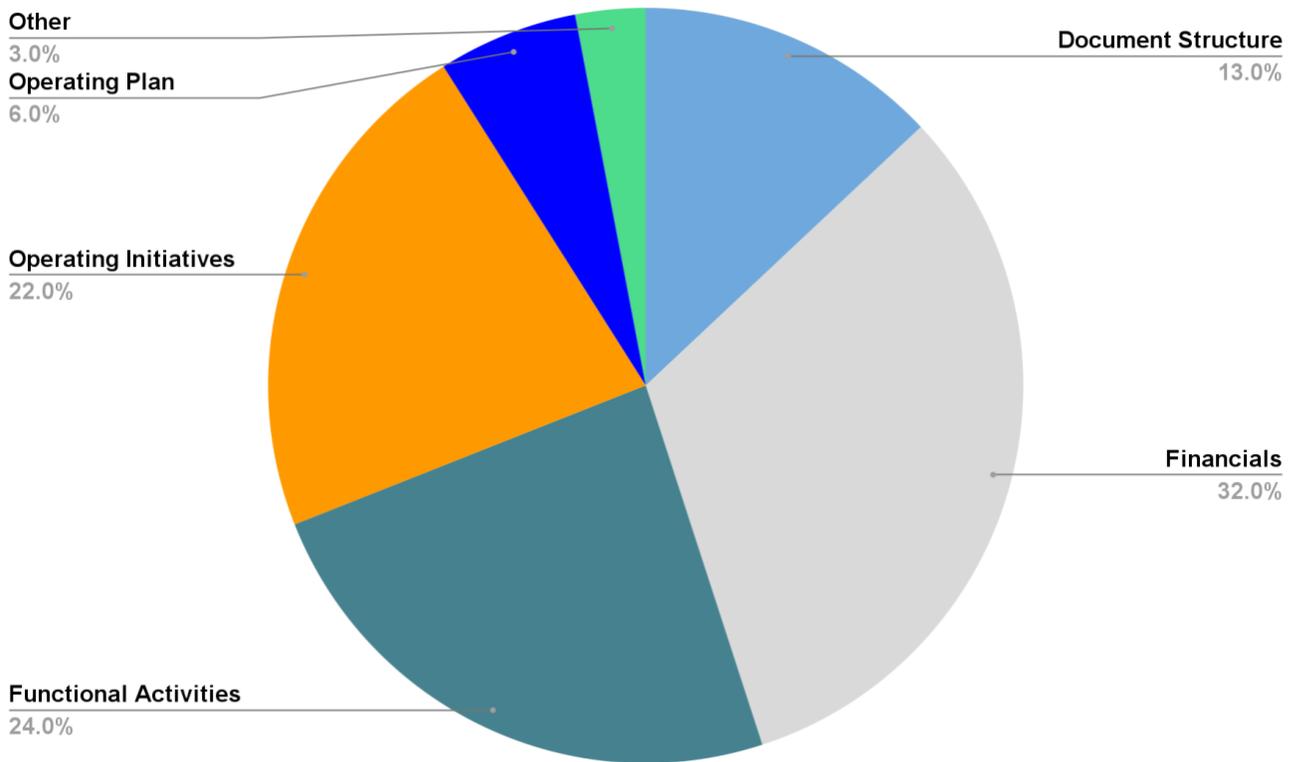
Section 4: Analysis of Submissions
4.1 Document Structure
Five groups submitted 13 comments regarding the document structure, particularly about the document's length and details, as well as some suggestions for future enhancement.

ICANN org appreciates the ALAC, BC, ccNSO SOPC, RrSG and RySG's compliments and support of the improvements in the draft planning documents this year.

The ALAC supported the five-year rolling roadmap of Policy, Review, and CCWG work, and suggested this method could/should be used to track other elements of the plan. ICANN org appreciates the ALAC's compliment of the five-year rolling roadmap. ICANN org acknowledges and appreciates ALAC's suggestion of reporting and tracking other elements of the plan using a similar method. ICANN org will continue to evaluate ways to measure progress toward achievement of the plans. A targeted outcome of the Planning at ICANN Operating Initiative is the design and implementation of a progress reporting framework. ICANN org will highlight enhancements to future plans when engaging with the community on the draft plans moving forward.

The ALAC also commented that Appendix B does not provide a comprehensive view of the linkage between the Operating Plan and the Strategic Plan, as it did in the previous years' plan. In the FY22's planning document, the Strategic Goals Targeted Outcomes section contains essential information that ties each Operating Initiative and Functional Activity back to ICANN's Five-Year Strategic Plan. However, as part of the continuous improvement during the FY23 draft plan development, ICANN org noted that the content under the "Strategic Goals and Targeted Outcome" section is repetitive among some Operating Initiatives and/or Functional Activities. Moreover, a block of text on the page not only takes much of the footprint, but it also does not necessarily provide the complete visual linkage between the two plans. Thus, ICANN org introduced Appendix B as an improvement. ICANN org appreciates the ALAC's comment about Appendix B not showing full linkage of the Strategic Plan to the Operating Plan. ICANN org will evaluate and assess whether further improvements can be made in the next planning cycle.

The BC suggested that the planning document title should better reflect the versions of the documents. For example, the word "Draft" should precede the title of the documents when they are considered draft editions. ICANN org acknowledges and appreciates the BC's suggestion of the plan's naming convention. ICANN org will evaluate and where appropriate, incorporate in the next version of the planning documents.

The ccNSO SOPC and RySG suggested easier ways to identify changes or new activities in the draft plan when compared to the previous year, such as a red-line or comparison version suggested by the RySG. ICANN org acknowledges that the planning documents are massive for the community; it is also challenging to balance

between "stay at a high and strategic level" and yet be "more transparent" about all activities each function plans for the upcoming years. Currently, new strategic activities are indicated with a delta (Δ) icon in the plans. ICANN org is committed and will continue to evaluate and engage with the community for ways to further improve the plans.

The RySG made several comments about providing information on progress, ongoing activities, work already done, and updates on achievements for the coming years. ICANN org appreciates the RySG's comments on reporting progress against the planned activities. The Draft Five Year Operating and Financial plan and the Draft Annual Operating Plan and Budget are, however, forward looking plans with activities, estimated resources, progress measurement to be reported, etc., versus report out documents. Currently, ICANN org reports performance via the CEO Reports to the Board and ICANN's Annual Report, which are published on icann.org. Please also see section 4.2.2 for more details on progress measurement and reporting.

The RySG suggested ICANN org compile specific questions for key issues on which ICANN org is seeking community input during the Public Comment proceeding to enhance the focus for specific comments. ICANN org appreciates the RySG's suggestion and will work with the relevant functional teams to evaluate this suggestion, and where appropriate, incorporate the suggestions in future planning cycles.

4.2 Operating Plan

ICANN org received six comments about the overall Operating Plan, including comments about prioritization, Operating Initiatives resources, functional activities resources and overarching progress measurement and reporting.

4.2.1 Prioritization

ICANN org appreciates the ccNSO SOPC's comment on prioritization and acknowledges its concern about the short to mid-term workload and resources impact on projects and activities, such as the implementations of the New Generic Top-Level Domain (gTLD) Subsequent Procedure (SubPro) recommendations and System for Standardized Access/Disclosure (SSAD), particularly if they are to be run in parallel with other major programs, for example, the implementation of Work Stream 2 and the Third Accountability and Transparency Review Team (ATRT3) recommendations.

The ICANN org planning team is leading the effort developing the Planning Prioritization Framework that is intended to serve as a guide for what to prioritize, who will prioritize, when to prioritize, how to prioritize, etc, so that the community, org, and Board can collaborate during the annual planning process. The framework was published in February 2022 and ICANN org is running a pilot now with the community to test the process and methodologies developed, and identify gaps for further improvement. The pilot is intended to be complete by the April/May timeline. One of the outcomes of this pilot is a list of activities to be prioritized for FY23. Once the community pilot group

delivers the list, ICANN org will evaluate and develop work plans, and obtain resources for implementation.

The other outcome of the pilot is to gather lessons learned and refine the draft framework. During the FY24 annual planning process, ICANN org will implement the prioritization framework with the full scope of activities to be prioritized in discussion with the community.

4.2.2 Progress Measurement and Reporting

Both the ALAC and ccNSO SOPC commented on progress reporting and measurement. ICANN org appreciates both the ALAC and ccNSO SOPC's comments and suggestions about metrics, Key Performance Indicators (KPIs) and related data collection about performance measurement and reporting.

Related to progress measurement, it can vary depending on the nature of the activities, just as the ccNSO SOPC pointed out, for example, the "transactional and non-transactional KPIs." ICANN org's planning documents includes several types of progress measurements, for example:

- Progress can be measured by a completion of deliverables (outcomes), such as the planning team's timely delivery of ICANN's Five-Year Operating and Financial Plan and One-Year Operating Plan and Budget, which are required by the Bylaws, see page 231 of the Draft FY23 Operating Plan.
- Progress can also be measured by performance, such as the number of complaints resolved by the Contractual Compliance team, see page 182 of the Draft FY23 Operating Plan.

ICANN org will review and engage with the community in FY23 to identify potential improvements in progress measurement. The "How Progress is Tracked" sections of the plan will continue to be refined and more metrics-driven in future documents.

Related to progress reporting, ICANN org currently reports performance via the CEO Report to the Board and ICANN's Annual Report, which are published on icann.org. ICANN's Planning team will be working on a progress reporting framework as part of the "Planning at ICANN" Operating Initiative deliverable and also to support the Board Strategic Planning Committee's work plan of measuring and reporting progress of ICANN's FY21-25 Strategic Plan. ICANN org looks forward to working with the community and Board on this initiative.

4.2.3 Operating Initiatives Resources

The ALAC commented on the removal of the five-year financial estimate of the Operating Initiative resources.

As part of the continuous improvement of the planning documents, ICANN org identified that almost every Operating Initiative includes two types of work in its plan: the incremental continuous operation activities and project-based activities. In light of

improvements made to the budget, resources approval and allocation process, the resources for Operating Initiatives are now presented differently:

- The resources for incremental continuous operation activities are included as part of the annual functional activity budget.
- The resources for project-based activities will seek available funding once the project plan is approved, such as seeking for funding through the Supplemental Fund for Implementation of Community Recommendations (SFICR). This type of funding is budgeted centrally and can be allocated to the project or function upon approval, similar to the way org headcount is budgeted.

For clarification and improvement, ICANN org removed the Operating Initiative estimate tables from the plan. Please refer to Section 4.5 for more information related to SFICR and headcount.

4.2.4 Functional Activities Resources

The ccNSO SOPC commented on activities related to potential implementation of Board-approved SSAD and SubPro policy recommendations, and its concerns of resourcing and funding related to these significant activities. ICANN org acknowledges the ccNSO SOPC's comment and concern. If the Board approves the SSAD implementation plan, it will require significant up-front costs to launch. ICANN org is planning to utilize the SFICR to fund the SSAD implementation plan if approved by the Board. This same approach is expected to apply to implementation of Board-approved SubPro policy recommendations. There is no doubt these activities will result in workload increase. In ICANN Operations, ICANN org budgeted an average headcount of 423 over the five-year period FY23-27, an increase of 29 headcount from the FY22 Forecast. Please refer to Section 4.5 for more information on headcount and SFICR.

The GNSO asked how additional resources will be drawn from, such as the SFICR or contingency budget. ICANN org's Planning Prioritization Framework, in which the community participates, will drive the prioritization process of Board-approved community recommendations. Once a project has been prioritized, ICANN org will then determine how it should be funded (e.g., operational budget, contingency, SFICR, etc.) and these projections will be presented in the following planning cycle. Please refer to Section 4.5 for more information on contingency and SFICR.

4.3 Operating Initiative Plans

4.3.1 Support the Evolution of the Root Server System

The RySG expressed its strong interest in the ongoing strength of the Root Server System (RSS) and appreciates ICANN's Root Name Service Strategic and Implementation report (OCTO-16).

The RySG would appreciate additional clarification about how the activities of the root server operators will be funded. In response to the RySG's comment, ICANN org indicates that the org supports evolving RSS governance according to the proposed

model in RSSAC037. ICANN also supports the efforts of the RSS Governance Working Group (GWG) to achieve consensus outcomes that implement enhanced RSS governance and root server operator accountability. The ICANN Board convened the GWG for this purpose. At the time of planning for FY23, the RSS GWG discussions continue, and it is too early to know the specific details for future RSS governance. As the RSS GWG refines its proposal, ICANN org will work with the GWG to estimate the cost and plan detailed activities for implementation of the eventual RSS governance model. Today, independent Root Server Organizations (RSOs) are responsible for funding the technical operations of their service. Evolving RSS governance will result in significant changes to ICANN. Any budgetary and financial implications will be handled through ICANN planning processes that ensure accountability and transparency.

4.3.2 Facilitate the DNS Ecosystem Improvements

The RySG inquired for more information and engagement opportunities with ICANN org about the kinds of research ICANN intends to undertake regarding the use of artificial intelligence to understand abuse trends in domain registration. This Operating Initiative focuses on deep learning methods to predict malicious domains. The goal of machine learning for malicious domain detection is to maximize predictive accuracy. This Operating Initiative will assess the potential of machine learning and provide the community with understanding of the strengths and weaknesses of such predictive methods.

The RySG also commented on the "consideration" section of this Operating Initiative suggesting that there should be more information on the expected impact or its potential solutions. These considerations are standard risks that the org takes into account, but with a particular focus on data acquisition.

- Inline of the consideration about risks to exceed ICANN's remit and privacy impact, ICANN org must continue to adhere to the adopted practices related to the European Union General Data Protection Regulation (GDPR). The data in which the org might decide to collect must fit within the scope of the org's remit and the adopted data privacy practices.
- There might also be times in which the org may not be able to gain access to a particular dataset that could be helpful in its research. These are not identified, and the org will take every effort available to work with the data provider to attain said data.
- Finally, around the last consideration regarding the risk of "Key stakeholders may not agree with norms developed"; this is primarily around the efforts surrounding the Knowledge-Sharing and Instantiating Norms for DNS Naming Security (KINDNS) project. It is a foreseeable risk that ICANN has anticipated. One way ICANN org mitigates this is through continuous engagements via an open mailing list, to allow all stakeholders to contribute to the process of developing and agreeing on the best practices. The outcome is not about absolute consensus but focuses on general acceptance of norms and best

practices. ICANN org invites you to participate in the work of KINDNS by going to the community wiki page at https://community.icann.org/display/KINDNS.

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

The ALAC commented on the challenges of following the progress of this Operating Initiative. In addition, the ALAC also commented on the lack of overall strategy to recognize efforts, especially the community-led efforts towards the initiative. The ALAC suggests a regular, inclusive progress report to stakeholders, including a call-out to the community for contributions. ICANN org appreciates the ALAC's comment and suggestion regarding progress reporting of this initiative, and more broadly, the overall progress reporting of ICANN's Operating Plan and Strategic Plan. Please refer to section 4.2.2 for more information about progress measurement and reporting in general. Related to this Operating Initiative, ICANN org's Implementation Operations function is working on an action plan to address the community comments received on the Draft Evolving ICANN's Multistakeholder Model Work Plan and summarized in the paper "Enhancing the Effectiveness of ICANN's Multistakeholder Model" published on 14 October 2020. (see https://www.icann.org/en/system/files/files/enhancing-effectiveness-multistakeholder-model-14oct20-en.pdf). The plan will be presented to the community in the coming months. A dedicated community page will be created to ensure a timely update on the various actions. In addition, the org publishes various reports on a regular basis to keep the community up to date on the status of the implementation of the various implementation activities. Public Comment proceedings together with webinar sessions serve to collect community contributions. In regard to the overall strategy to recognize community-led efforts towards this initiative, the org would appreciate receiving clarification and input on this comment so that it can follow up in an appropriate manner.

The ALAC emphasized the importance of proceeding with the Holistic Review with the timing requirement and associated dependencies. ICANN org recognizes the need to proceed with the Holistic Review pilot, in view of the recommended time frames. Therefore, the Draft FY23–27 Operating and Financial Plan confirms that planning is underway for the Holistic Review pilot. In February 2022, the Chair of the Board's Organizational Effectiveness Committee wrote to the ATRT3 shepherds to invite them to work with a subset of the Organizational Effectiveness Committee of the Board and develop draft Terms of Reference for the pilot that will be sent to all SOs and ACs for input. The final Terms of Reference will then serve as "important input for future prioritization and budgeting across ICANN" (see https://www.icann.org/en/system/files/correspondence/doria-to-shepherds-02feb22-en.pdf). The Draft FY23–27 Operating and Financial Plan also recognizes that the Holistic Review pilot is a critical dependency for the timing of all future Reviews, and proposes a potential sequencing of Reviews-related work, including initiating design for the Holistic Review and Continuous Improvement pilots. In approving specific ATRT3 recommendations, the Board noted that the Holistic Review and Continuous Improvement pilots would be subject to prioritization. In the case of the Continuous

Improvement pilot, the Board stated that this is to be conducted "when deemed appropriate through the prioritization process" (see https://www.icann.org/en/system/files/files/resolutions-atrt3-final-recs-board-action-scorecard-30nov20-en.pdf). Related to this, ICANN org's Planning team is currently preparing to conduct a pilot of the Draft Prioritization Framework, involving representatives from the community, between March and May 2022. Focusing on those Specific Review recommendations that the Board has adopted and that are pending implementation, the outcome of this pilot will inform ICANN org's assessment and allocation of resources for the implementation of the various Review-related recommendations, including the Holistic Review and Continuous Improvement pilots.

The ALAC recognized the need to collect diversity related data, but also emphasized that the focus should be on education and support mechanisms to make better use of the diversity already in place. The ALAC also emphasized that diversity must be evident at all levels, most particularly at all leadership levels, including the Board of Directors. ICANN org agrees that diversity is critical to the ICANN ecosystem and should be evident at all levels. ICANN org has continued to prioritize the implementation of Work Stream 2 (WS2) into FY23. Implementation of relevant WS2 recommendations by the SO/AC/Groups (e.g., on diversity strategies and assessment, and outreach and participation) should provide regular and helpful insights into diversity within the ICANN community, including opportunities to improve entry points and to leverage existing opportunities. The WS2 recommendations that the Board approved also include the need for ICANN org to provide support for the community's diversity assessments and strategies. Engaging an external diversity expert to provide subject matter expertise to assist with the org's support of the community's implementation of the WS2 diversity recommendations is a key step toward improving diversity throughout the ICANN community.

The GNSO commented on the level of resources needed for FY23 and welcomed the opportunity to engage on the future work of the GNSO to be examined by ICANN org for personnel resources decisions and best practices for project management staffing. ICANN org agrees with the GNSO Council that the two additional staff planned for the Policy Development Support function will be critically important to ensure adequate support for the community's policy work. ICANN org regularly reviews its personnel levels to ensure that it can continue to support the community's changing needs and workload, which includes an org-wide process that enables each function to identify any additional staffing needs for review by the responsible executives in light of available resources and overall priorities as determined by the Five-Year Strategic Plan and Operating Plans. ICANN org appreciates the GNSO Council's adoption of planning and other tools, such as the Action Decision Radar, to manage its work as well as the GNSO's continuous improvement efforts to enhance efficiency and effectiveness of its policy processes, such as Policy Development Process (PDP) 3.0. These community efforts provide ICANN org with helpful information regarding the community's needs and priorities. ICANN org looks forward to engaging with the GNSO Council and interested

community groups to ensure that the org has an up-to-date and clear understanding of each group's workload, planned priorities and support needs.

The RySG commented on the importance of transparency of the Multistakeholder Model (MSM), in particular, the activities undertaken by ICANN org and the CEO, including interactions with governments or regulators and how the community and ICANN org can coordinate on our support of the MSM. ICANN org appreciates the RySG's support of the MSM. One of ICANN's President and CEO's goals for this fiscal year is to "set up an interaction point with the community regarding legislation and legislative proposals." Because of that and in addition to the President and CEO's existing touch points with the community (such as the regular 1:1 CEO-community leadership calls and the SO/AC Chairs Roundtable), ICANN73 was the first recurring community discussion forum on legislative and regulatory developments that may impact the domain name system. ICANN org's Government Engagement function also publishes periodic updates on pending legislation and new regulatory initiatives: https://www.icann.org/resources/pages/government-engagement-publications-2020-03-02-en. ICANN org encourages the RySG and community to suggest how ICANN org can continue to provide the community with relevant updates in a transparent manner.

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

The ALAC once again commented on the progress reporting of the MSM work plan. ICANN org invites the ALAC to refer to section 4.2.2 and section 4.3.3 for more information and similar response.

The RySG suggested ICANN org provide increased training and support for chairs and leaders of ICANN work efforts, including Reviews, PDPs, Cross Community Working Groups (CCWGs), etc. The RySG also appreciates ICANN org's strong staff support and resources for chairs to be able to accurately summarize discussions and drive toward divisions as it is critical to efficient and effective work of PDPs and working groups. Lastly, the RySG suggested that measurement towards this Operating Initiative should also include measures related to Board activity that contributes to the progress on other work items, and not only the "Completion of implementation of Board-approved recommendations from Organizational Reviews." ICANN org agrees that preparatory scoping as well as the identification of specific objectives and precise and manageable tasks are key to effective policy decision making. ICANN org thanks the RySG for its suggestion about increased training and support for community chairs and leaders and looks forward to consulting with the RySG and community on specific ways to improve on the current tools, training and other support for the community, which builds on the community's work in relation to PDP 3.0, the Consensus Playbook and other existing materials.

ICANN org appreciates the community's commitment to enhancing the efficiency and effectiveness of the policy development and other community decision making processes. In this regard, the GNSO's work on PDP3.0, its establishment of the

Committee for Overseeing and Implementing Continuous Improvement, and its plan to review the principles and recommendations developed by the Policy and Implementation Working Group, among other initiatives, are key to further community-led improvements.

Related to the ICANN Board, the Chair regularly updates the community about the Board's priorities, progress, and workshops, including via public blog posts and meetings with community leaders and groups. The Board has also expressed its willingness and desire to engage more frequently and informally with the community, and has approved guidelines to enable Board members to participate and contribute to community work as liaisons, when appropriate (see https://www.icann.org/en/system/files/files/board-liaison-guidelines-31may21-en.pdf).

4.3.5 Develop Internal and External Ethics Policies

The BC recommended ICANN org to include an important step of Ethics Policy review with standards at Transparency International or any other top ethics advancement organizations during the period under consideration. ICANN org appreciate the BC's suggestion regarding the use of established external benchmarks to support this review.

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

The RySG suggested ICANN examine competition within the Domain Name System because it is imperative to examine the industry in order to fully understand the competitive landscape, and eventually promote and sustain competition. ICANN org welcomes any suggestions in relation to studying, understanding, tracking, and supporting the nature of the DNS.

4.3.7 Root Zone Management Evolution

The RySG commented "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." ICANN org is certainly mindful of stability impacts of any operational changes to the root zone and its associated management practices. The org's approach to evolving the user model includes ensuring that it works the same for customers that do not opt to change their current configuration. ICANN org also notes that access to the root zone management functions is not predicated on having system access; change requests can continue to be submitted via other means as is supported today. Another important safeguard is that IANA staff continue to manually monitor and review all changes to the DNS root zone. More detailed information on the changes will be shared with customers of the system as we get closer to implementing these improvements.

The RySG also commented that staff retention is an absolute necessity for the success of PTI/IANA functions. ICANN org appreciates and agrees with the RySG's comment. A

primary purpose of ICANN's Global Human Resources is to attract and retain top talent for ICANN org. Please refer to the Global Human Resources section of the draft Operating Plan for more details.

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

The RySG believes that an effective GAC is a crucial part of an effective MSM for ICANN. The RySG appreciates ICANN's work to continue improving the transparency around ICANN's engagement with governments and intergovernmental organizations and forums. ICANN org appreciates the RySG's comment for the work done to improve transparency and its support of an effective MSM. Further, as part of the continuing work towards the goal of improving transparency, ICANN org will present regularly at ICANN Public meeting sessions to act as an interaction point with the community regarding IGO engagement and legislative proposals that ICANN is monitoring.

4.3.9 Improve Governmental and Intergovernmental Organization (IGO) Engagement and Participation in ICANN Through Targeted Engagement

The BC recommends about the progress reporting of this Operating Initiative and suggested that ICANN org includes a published report on the number of in-country engagements by ICANN org/Affiliates at Fora (e.g., Internet Governance Forum) where potentially impactful issues are discussed including cybersecurity, data protection, privacy, cultural and geographic identifiers, emerging technologies, and proposed new systems of unique identifiers. It is the BC's belief that such engagement would constitute an early warning mechanism for further action by the concerned.

ICANN org appreciates the BC's comment and suggestion. ICANN publishes bi-monthly reports to the GAC on government and IGO engagement activities. Currently 68 reports are published, with each report categorized by region, providing two months of past events and one month of planned events. The reports can be found on the GAC website at this link: https://gac.icann.org/activity/bi-monthly-report-icann-gse-ge-governments-and-igos-engagement-activities. In addition, important information is provided in the analysis and in the government engagement and country focus publications (https://www.icann.org/resources/pages/government-engagement-publications-2020-03-02-en) as well as the CEO reports to the Board (https://www.icann.org/reports-to-board).

ICANN org also appreciates the RySG's comment that an effective GAC is crucial part of an effective MSM for ICANN.

4.3.10 Monitor Legislation, Regulation, Norms, Principles, and Initiatives in collaboration with Others that May Impact the ICANN Mission

The BC recommends the progress reporting of this Operating Initiative similar to its comment in section 4.3.9. ICANN org invites the BC to refer to the response provided in section 4.3.9.

The GNSO recommends that ICANN org include a goal to publish reports on the number of in-country engagements by ICANN org and affiliates at Fora (e.g., Internet Governance Forum) where potentially impactful issues are discussed, such as cybersecurity, data protection, privacy, cultural and geographic identifiers, emerging technologies, and proposed new systems of unique identifiers. ICANN org appreciates the GNSO's comment. ICANN org publishes bi-monthly reports to the GAC on government and IGO engagement activities, such as regional Internet Governance Forums. Currently 68 reports are published with each report categorized by region, providing two months of past events and one month of planned events. The reports can be found on the GAC website at this link: https://gac.icann.org/activity/bi-monthly-report-icann-gse-ge-governments-and-igos-engagement-activities. In addition, ICANN org regularly publishes updates on IGO activities with the potential to impact ICANN's mission. These analyses can be found at this link: https://www.icann.org/en/government-engagement/publications

ICANN org also appreciates the RySG's comment and support for the work in support of this Operating Initiative.

4.3.11 Implement New gTLD Auction Proceeds Recommendations as Approved by Board.

The RySG commented that it looks forward to progress on the Auction Proceeds recommendations and asked for more insight into the timeline for this initiative. The Board and org are progressing the Board's consideration of the recommendations of the Cross-Community Working Group on Auction Proceeds (CCWG-AP). At the ICANN Board's request, ICANN org is currently working on a requirement gathering exercise and initial assessment work. This will be provided to the ICANN Board so that it can review and determine next steps in developing the design of the recommendations. Upon Board review and decision regarding next steps, a timeline will be created and shared with the community.

4.3.12 Planning at ICANN

The RySG commented that it looks forward to the rollout of the Planning Prioritization Framework. ICANN org appreciates the RySG's comment and interest, as well as all community members' interest in the Planning Prioritization Framework. The Draft Planning Prioritization Framework V1 is now published on the ICANN Planning and Finance workspace here. As part of the initiative, the org is organizing a pilot with community members. The pilot will give ICANN org and the community an opportunity to test the process and methodologies developed in the draft framework and identify possible gaps for further improvement. The org is expecting to conduct the pilot during the March/April 2022 timeframe and provide an update to the Board and community once the pilot has completed. The pilot will be limited to the implementation of Board-approved Specific Reviews recommendations.

ICANN org is committed to continue working on the Planning Prioritization Framework, the Prioritization Pilot and the subsequent implementation of the framework in FY24's planning process. Community participation is a critical step in the prioritization process, and ICANN org looks forward to enhancing the overall planning process.

4.4 Functional Activities Plans

4.4.1 ICANN Managed Root Server

The ccNSO SOPC supported the activities planned for the ICANN Managed Root Server (IMRS) that additional locations of IMRS large clusters will be added, the ccNSO SOPC also agrees that these activities require additional year-zero capital expenses funding, year-two maintenance and hardware upgrades to maintain stability and resiliency, as well as year-on-year funding to cover connectivity, colocation, and power costs. ICANN org appreciates the ccNSO SOPC's support of the activities and anticipated resources needed for this function.

4.4.2 Policy Development and Advice

The ALAC commented that the FY22 operating plan for the operating initiative, "Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policy Making" (p.37), acknowledged the possible need for a program or project manager to support the full breadth of the community's policy projects and activities. It was expected that the outcome of the planning and prioritization process would demonstrate the extent to which additional staff was needed and what type of skills and expertise might be necessary. The ALAC asked if the position of project manager mentioned in FY22 is now redundant or has been incorporated into an existing staff role? ICANN org has successfully conducted a recruiting exercise for a Senior Program Manager, to be assigned to the Policy Development Support function, between October 2021 and February 2022. Among other duties, this position will be responsible for managing the portfolio of programs, projects and operations within the Policy Development Support function and to ensure that resources are allocated and prioritized in alignment with the org's strategic, financial and operating plans. ICANN org anticipates onboarding the new Senior Program Manager in or around March 2022.

The ALAC also commented that it would like to have a staff member specifically assigned as policy support for the At-Large community. The org acknowledges the ALAC's comment as it constantly reviews its personnel levels to ensure that it can continue to support the full extent of the community's work and is in line with possible changing community needs. The Policy Development Support function continues to assess how its structures and staff assignments can adapt to best support the increasing community need to work across the various structures in light of the growing complexity of policy issues being tackled by the community and for the new structures created through the IANA stewardship transition and each community's own evolution. These changes have highlighted the need to be able to fill emerging gaps with appropriately-skilled staff and to have sufficient flexibility to respond and provide support in a nimble manner. Currently, new hires into the Policy Development Support function

are generally assigned to a number of policy and advice activities. Building on the fact that the function already has strong leadership teams in place that support individual Supporting Organizations and Advisory Committees, staff assignments and resource allocations are done and adjusted based on current community workload and needs.

The BC indicated that the specific importance of confirmation that current and continuing secretariat support includes responsibility for preparation and distribution of minutes for all BC meetings during FY23 and in future years. ICANN org continues to provide support for the community's policy and advice activities, including the BC as a GNSO Constituency. ICANN org intends to continue to provide the same level of support to the community in FY23, with a view toward evolving the nature and focus of various forms of support in alignment with the community's changing needs. ICANN org will engage with the BC and other community structures to continue to ensure that the nature and level of support is appropriate to the community's needs, in view of overall resources and community priorities.

The GNSO commented on maintaining adequate non-personnel resources for Policy Development Support. In the GNSO Council's comment on the FY22 Budget, ICANN org pointed out 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 were being adequately funded. The GNSO Council acknowledges that most of PDP 3.0 has been implemented and that its various tools and resources are covered by the Policy Development and Support Functional Activity section of the FY23 Budget, and in particular, the Technical Services and Contingency subsections. The GNSO Council noted that it will continue to provide a review and analysis of these budget sections on a recurring annual basis. ICANN org thanks the GNSO Council for its regular input to and feedback on the annual budget and planning documents. The org looks forward to continuing engagement with the GNSO Council, GNSO Stakeholder Groups and Constituencies, and other community structures and committees to ensure that the annual budget and operating and financial plan reflect appropriate levels of support for the community's work in alignment with the community's priorities and the Five-Year Strategic Plan.

4.4.3 Policy Research and Stakeholder Programs

The ccNSO SOPC noted that on page 61 of the draft plan, the policy research and stakeholder program function indicated particular study and research requests, which may require procurement of professional services, e.g., consumer or registrant surveys, extension of statistical analysis of DNS abuse in gTLDs, or economic analysis. The ccNSO SOPC commented that it seems the referenced analysis is only on DNS abuse in gTLD to the exclusion of ccNSO requests. ICANN org appreciates this comment and the interest of the ccNSO SOPC in potentially requesting particular studies. ICANN org will update this point to clarify that the scope of research requests is not limited to gTLDs.

4.4.4 Contracted Parties Services Operations

The ccNSO SOPC noted a reference to the 2012 round New gTLD Program on page 62 of the draft plan. The ccNSO SOPC asked if ICANN org is still accepting/processing applications for the 2012 round of the New gTLD Program? If so, would this impact the next round? The application window for the 2012 New gTLD Round closed in May of 2012. There are currently a number of applications from the 2012 Round that are either in "on hold" or "will not proceed" status and are still being processed. Strings applied for in the 2012 round of the New gTLD Program that still have active applications cannot be applied for in the next round. For more information about the 2012 New gTLD Program statistics, please visit: https://newgtlds.icann.org/en/program-status/statistics.

4.4.5 Global Stakeholder Engagement and Regional Offices

In the draft FY23 Operating Plan, Global Stakeholder Engagement (GSE) travel costs are anticipated to be higher as in-person gatherings resume from historically low levels during the pandemic. Community demand for support to participate in regional events is likely to continue to increase. The ccNSO SOPC notes that this assumption may be not accurate as future meeting models may be more hybrid-based, so travel costs may stay at the same level as the previous five-year period. The comment continued with, "It is not clear which model this is based on and ICANN is invited to share a clarification thereon." Its assumptions are based on the number of events being planned with in-person attendance thus far in calendar year 2022 and on uncertain travel costs (transportation, lodging, local COVID testing requirements, etc.) that may be incurred. Future meeting models are unclear. Given decreased participation and volunteers during the past two years of the pandemic, there is a need to reactivate engagement with a variety of stakeholders and to reach new participants who can contribute to ICANN's technical and policy work. This type of engagement will use a mix of hybrid and in-person approaches, and the best assumption at this point is that travel costs may be higher than before the pandemic.

4.4.6 Public Responsibility Support

The ALAC noted that US$1.7M has been allocated to support this set of initiatives. The ALAC suggested that the crucial process of bringing new participants into the ICANN process and keeping them deserves a higher level of support. Since the purpose of this activity is to increase diversity and lower barriers to participation, which directly addresses the multistakeholder model issue of recruitment and demographics, thee ALAC suggested that funding in this area be increased to US$2.2M and that US$.5M be made available for innovative education and recruitment programs suggested by the community. The funds allocated to support the scope and breadth of existing and planned initiatives has resulted in positive results toward the goal of bringing diverse and informed stakeholders into ICANN. This includes allowing for the capacity and ability to design and execute potential new pilot projects. In close collaboration with the community, the org will continue to support new and innovative programs that seek to address ongoing community needs. These collaborative efforts have proven effective in addressing community needs over the years.

The ccNSO SOPC indicated that, in the draft FY23-27 Operating Plan, the functional plan is to facilitate a community-led Intercultural Awareness Program training session aimed at raising community awareness and understanding of cultural norms and best practices across regions. The ccNSO SOPC wonders whether this program is limited to community leadership or is developed for the entire community? The ccNSO SOPC also questions the added value or benefit therefrom, taking into account the effort it would require from both ICANN org and the community to achieve sustainable and concrete results. The planned Intercultural Awareness Program training session will be limited to the participants of the ICANN Leadership Program in its first iteration. Following this first iteration, ICANN org will collaborate with the community on putting together an online course that seeks to combine all of the learnings and best practices in this area, and make that information readily available for everyone through ICANN Learn.

4.4.7 Government and Intergovernmental Organization Engagement (GE)

The BC recommended that ICANN org include the number of interactions led by the President and CEO (or his designee) at top-level government or Intergovernmental fora where potentially impactful issues are discussed, via cybersecurity, data protection, privacy, cultural and geographic identifiers, emerging technologies, and proposed new systems of unique identifiers. The requested information is reflected in the government activity reports and in the CEO Reports to the Board. In addition, detailed information on potentially impactful issues that are discussed are covered in the government engagement publications. Please see the following for examples: GE Publications: https://www.icann.org/en/government-engagement/publications
CEO Reports to the Board: https://www.icann.org/reports-to-board. GAC Reports: https://gac.icann.org/activity/bi-monthly-report-icann-gse-ge-governments-and-igos-engagement-activities

The ccNSO SOPC commented on the anticipated increased need for professional service contracts to cover specialized events and information gathering. The ccNSO SOPC believes that the proposed changes are fairly broad and vague, making them open to interpretation. The ccNSO SOPC noted that it would expect to see more focused and precise language. ICANN org appreciates the ccNSO SOPC's comment and will address the comment in the next version of the plan by providing examples of specialized events and information gathering that could be covered under the professional service contracts. For example, FY23-27 O&FP encompasses activity that will involve the UN Open Ended Working Group (OEWG), the Ad Hoc Committee (AHC), The Cybercrime convention discussions, the next round of the WSIS discussions as well as the ITU Plenipotentiary and many other geopolitical processes with the potential to impact ICANN's mission and the community's ability to make policy regarding the unique identifiers.

The ccNSO SOPC also commented that the planned activity of "increased participation in arenas that ICANN has not previously engaged as the locus of political action that can impact ICANN shifts" is described vaguely, and therefore the ccNSO SOPC

believes it will be difficult to draw any clear conclusions on whether the goal is achieved or adds value. ICANN org appreciates the ccNSO SOPC's comment. ICANN org has seen a proliferation in IGO and national discussions about cyber security and threats or challenges posed by the Internet. The increase in the number of new legislative proposals with the potential to impact ICANN's mission and create a complex environment for ICANN stakeholders and potentially disrupt the multistakeholder model. Therefore, ICANN org's intent for increasing participation in arenas that ICANN has not previously engaged before is to stay aware of legislative and regulatory proposals that may impact (i) ICANN policies and processes; (ii) ICANN's ability to manage the unique identifier system; and (iii) the community's ability to make policy. A more detailed analysis of this type of work is reflected in the various GE publications covering IGO processes. Please see the following for examples:
https://www.icann.org/en/government-engagement/publications

4.4.8 Global Communications and Language Services
ICANN org notes the suggestion to create and share an ICANN brand and communications manual to save resources needed for the Global Communications team.

While a brand and communications manual is useful (and ICANN org has had one for several years) to ensure consistency of ICANN's brand and content, providing it to the community will not reduce the volume of work the team must perform. The additional staff anticipated to be added to the Communications Team is necessary in order to match the increased volume of work and demand for content. The Global Communications team is responsible for media relationships, all content on ICANN.org, communication support for all functions within ICANN org as well as initiatives such as the SubPro ODP, communications planning for the next round pending Board approval, capacity-building programs and more.

4.4.9 Global Meetings Operations
The ccNSO SOPC commented that while it supports the budgetary assumptions to fund three face-to-face meetings, the ccNSO SOPC wonders if perhaps one of the three annual meetings could become fully remote, and asked if ICANN has given any consideration for such an arrangement. ICANN Public Meetings are important milestones for community work and play a key role in enhancing cross-community interaction including with the ICANN Board and org. The ICANN Meetings Community Planning Group (Planning Group), which is composed of representatives from each SO, AC, Stakeholder Group, Constituency and Regional At-Large Organization ("RALO"), is currently the main interface between ICANN org and the community for ICANN Public Meeting planning.

The Planning Group is a central forum for community information sharing on topics such as: (i) each community group's priorities for an ICANN Public Meeting; (ii) the appropriate time zones, duration and other key questions relating to the structure and

scope of each ICANN Public Meeting; and (iii) requests from ICANN org concerning ICANN Public Meeting scheduling and planning.

As an active member of the Planning Group, the ccNSO is encouraged to bring this proposal forward to the group for consideration by the community as well as the SO/AC Chairs who oversee deliberations and decisions made by the Planning Group.

4.4.10 Governance Support

The ccNSO SOPC commented on the Governance Support function's plan to establish a contract management database with several operational questions, including but no limited to: (i) How to collect the past contracts?; (ii) What is the form of the database, a software or an offline system?; and (iii) What are the needed resources and KPIs? The development of the contract management database will be defined in accordance with CANN's project management framework. This will be an internal tool and all appropriate business needs and requirements will be considered within the project scoping. ICANN org will consider the development of appropriate KPIs around the contract management database as it is created.

The ccNSO SOPC also questioned why the anticipated increased activity by the Governance Support function is limited to ICANN org governance only, as the ccNSO SOPC assumes that in other areas the workload during the pandemic has increased as well. As the Governance Function evaluated areas of significant resource expansion for reflection in the plans, its pandemic-related activities were of a significant enough magnitude to make a call out.

4.4.11 Planning

The ALAC noted that the strategic planning is to include SOs and ACs starting in FY23 for FY24. The ALAC pointed out that there is no additional budget set aside for this and it questions whether that will accommodate possible additional costs including facilitators and translation and interpretation support for meetings. The ALAC noted that such facilitators should help on the possible training for designated SO and AC representatives in the chosen strategic planning tools and prioritization of initiatives and activities, among others. ICANN org appreciates the ALAC's comment about the planning process for FY24, which starts in FY23. The ICANN's overall planning process starts with the Strategic Planning process each year via the Strategic Trend Outlook Identification sessions. This process involves the community, Board and org and the ICANN org planning team usually facilitates this process. Normally, the resources for this process are within the Planning functional activity (please see page 232 of the draft FY23 Operating Plan). No additional resources were budgeted at the time of planning.

The ccNSO SOPC commented on the resources section of page 102 of the FY23-27 Operating Plan, that resources for the planning function is expected to increase during FY23–27, with the following rationale: (1) Support establishing a systematic set of activities to support the annual planning process of a five-year horizon; and (2) Strengthening of Strategic Outlook trends monitoring. The ccNSO SOPC noted that the

ccTLD community is in need for predictable, balanced, accurate and realistic planning, rather than just an array of planning activities with vague KPIs and eventually being a self-servicing instrument. The ccNSO SOPC suggested that rather than increasing the planning efforts, other or additional monitored processes and introduced indicators may achieve the same result. The ccNSO SOPC indicated that examples of such re-definition could be the number of planned indicators-to-attained indicators ratio; the number of staff planned indicators to the number of community indicators ratio; etc. The ccNSO SOPC is therefore not convinced that the proposed changes contribute to the stated goal. ICANN org appreciates the ccNSO SOPC's comment about the planning department anticipated resource changes for FY23-27. One rationale for the anticipated resource changes is the "strengthening of Strategic Outlook trends monitoring." The Strategic Outlook program is a major element of ICANN's Strategic Planning process and a major step in ICANN's annual planning process. Throughout the years, the org has collected thousands of strategic trend related data. As the database of this trend related data grows, ICANN org anticipates the increased need to manage and monitor those trends, which will help ICANN org, together with the community and Board, better assess the impact and mitigate threats. The trend monitoring is not related to performance measurement monitoring or performance measurement reporting. Please refer to the Performance Measurement and Reporting section of this report for more details.

4.4.12 Review Support and Implementation

The ccNSO SOPC asked for clarification about the activities on page 104 of the draft FY23-27 Operating Plan. The ccNSO SOPC found the description of the activities to be unclear, as indicated that "With the current review cycle completed (with resulting implementation work in progress), the focus of work for the Review Support and Accountability team in FY23 will be on the preparations for the implementation of review-related ATRT3 recommendations subject to prioritization (see below), as opposed to the support and facilitation of reviews, as in prior years. The ccNSO SOPC noted that the new Holistic Review recommended by the ATRT3 serves as a critical dependency for the scheduling and timing of all future reviews. Therefore, according to the ccNSO SOPC, the Holistic Review pilot that the Board directed ICANN org to initiate (subject to prioritization and available resources) could be prioritized for planning and implementation ahead of other ATRT3 and community-issued recommendations." In response to this comment, ICANN org is clarifying that the result of the effort outlined in the noted paragraph is to provide support and facilitation to the Holistic Review pilot, to be undertaken once the related ATRT3 recommendation is prioritized for implementation. The Holistic Review pilot is a Specific Review Board-approved recommendation by the ATRT3. As such it will be conducted by a community-led review team, to be appointed by the SOs and ACs. The work of the community-led review team is expected to last 18 months.

The ccNSO SOPC also asked for further clarification of the anticipated resources needed for this function during FY23-27 and whether or not there is a need for additional resources in FY23 and going forward? The ccNSO SOPC also asked, what

are the parameters that define this need? ICANN org is clarifying that the parameters that define the need for additional resources relate to the timing and scope of work associated with the next round of Specific and Organizational Reviews, in terms of the facilitation and support provided by the Review Support and Accountability team.

The ALAC commented that the draft budget does not seem to be in line with the ATRT3 recommendations both for periodic reviews by community groups, and particularly for the recommendation for a "Holistic Review." When the Board approved ATRT3 recommendations pertaining to reviews in November 2020, the Board took that action subject to prioritization and with certain caveats. Specifically, the Board approved recommendation 3.5 to create a Holistic Review, subject to prioritization, and "...with the caveat that more information is required to better understand how to operationalize the Holistic Review to ensure it yields the outcomes intended by the ATRT3." Similarly, the Board approved recommendation 3.6 to evolve Organizational Reviews into a Continuous Improvement Program, subject to prioritization and "...with the caveat that more information is required to better understand how to operationalize the Continuous Improvement Program to ensure it yields the outcomes intended by the ATRT3 before Bylaws amendment is completed." As noted in the Draft FY23 Operating Plan: "The new Holistic Review recommended by the ATRT3 serves as a critical dependency for the scheduling and timing of all future reviews. Therefore, the Holistic Review pilot that the Board directed ICANN org to initiate (subject to prioritization and available resources) could be prioritized for planning and implementation ahead of other ATRT3 and community-issued recommendations. While the timing of this cannot be determined at the time that this plan is being developed, ICANN org recognizes the possibility of work toward initiation of the Holistic Review pilot taking place in FY23." The Draft FY23 Operating Plan and Budget is responsive to the Board approved ATRT3 recommendations while taking into consideration the prioritization work underway. Please also refer to section 4.3.3 for additional relevant information.

4.4.13 Global Human Resources and Administrative Services

The BC recommended that ICANN org make best efforts to ensure a balanced talent hunt across the world that reflects diversity and the global nature of ICANN. The org appreciates the BC's recommendation. ICANN org will continue to pursue a balanced global workforce across all regions that reflect diversity and global nature of ICANN.

The BC also recommended that ICANN org provide recommendations on the possibility of ICANN acquiring a permanent office complex in California. Over the past year its administrative services took steps with ICANN org's leadership team to ensure ICANN's long-term presence in California. ICANN org has secured a long-term lease until early 2033 at the current headquarters location in Los Angeles. ICANN org, along with its real estate brokers, examined the real estate market and determined that at this time it was more beneficial for ICANN org to lease rather than purchase office space.

4.4.14 Security Operations

The ccNSO SOPC commented that the last activity described in the security operations' FY23-27 Operating Plan on page 119 needs more clarification. ICANN org responded that the referenced text in this plan discusses Security Operations' plans to help the security operations function continue to grow and mature to support the needs of ICANN. Maturing the internal governance and structure of the team and succession planning helps ensure the team's ability to responsibly perform its critical work now and in the future. The Security Operations team maintains a broad skill set to be able to respond to present and emerging circumstances, and internal improvements support its continued readiness. More details on the Security Operations work as it relates to current and ongoing circumstances such as the COVID-19 pandemic, is available within the FY23 Budget and Operating Plan portion of the document at page 248.

4.5 Financial Management
4.5.1 Financials Reporting Schedules
Comments were received inquiring about the basis for cost estimates and ICANN org's commitment to cost optimization and efficiencies. The org is confident in the level of expenditures and its effectiveness in supporting ICANN's mission and community initiatives. Cost optimization and cost reduction is an ICANN org priority, and measures have been put in place to periodically review contracts and vendor spend in order to find efficiencies and economies of scale. In addition, the procurement team is fully staffed and rolling out new efforts to review contracts and vendors, and conduct Request for Proposals (RFPs) when appropriate in order to ensure that the best services and rates are being utilized. Lastly, stringent headcount policies have been put in place to ensure that the proper level of staffing is achieved and prioritized. Please see section 4.5.5 Headcount for more details.

To address concerns regarding inflation, ICANN org has considered inflationary impacts for both personnel expenses and non-personnel expenses. Personnel incorporates a standard cost of living increase. For non-personnel, functional areas provide budget inputs that incorporate recent trends and proposed expenses from vendors that work closely with ICANN or that are being reviewed by the procurement team for competitive services and pricing.

The ccNSO SOPC commented on professional services and the use of consultants as a supplemental and flexible alternative to hiring full-time staff. 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. Generally, about 50% 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% includes legal services for such items as contracted party agreements, accreditation matters, litigation, and dispute resolution. About 12% 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.

The RrSG noted and inquired upon the different rates for travelers in section 4.5.1 Constituent Travel of the Draft FY23 Budget document. The difference in costs between groups for ICANN Public Meetings is due to certain travelers qualifying for business class travel versus the standard economy class. Business class travel is available only for ICANN Public Meetings and is authorized only for the current chairs of the three Supporting Organizations, four Advisory Committees, and the Nominating Committee. Eligibility is non-transferable. Vice chairs and incoming chairs are ineligible to fly in business class. ICANN Travel Support will certify waivers for the use of premium economy or business class travel to accommodate a medical or other special need as an exception to economy class travel. Supported travelers who receive medical waivers must be certified annually through a written statement. Please refer to the Community Travel Support Guidelines.

ICANN org acknowledges community requests over the past few budget cycles to understand resources allocated to each SO and AC. The org has been working extensively on this request and is dedicated to providing that information.

4.5.2 New gTLD Program
The New gTLD Program consists of the 2012 Round and the Subsequent Procedures (SubPro) Operational Design Phase (ODP). In response to the ALAC comments inquiring on the source of funds for the New gTLD Program, all costs for the 2012 Round and the SubPro ODP are funded by the collected 2012 Round application fees. The ICANN Board approved a US$9M use of funds from the 2012 Round to the SubPro ODP on 12 September 2021. Please see the resolution here.

The BC asked about the balances of expenses for the US$9M Board approved support for the New gTLD SubPro ODP. US$4M is reflected in the FY22 Forecast in section 6.3.1 Total ICANN FY22 Forecast of the FY23 Budget. The balance of US$5M can be found in section 3.1 Financial Overview. The FY23 budget is a total of US$10M for New gTLD Subsequent Procedures.

The ALAC asked how many strings from the 2012 Round of the New gTLD Program are left to be assigned. Twenty-nine applications representing 17 strings remain in the 2012 Round of the New gTLD Program. One application is actively working towards contracting and 13 applications make up two contention sets which remain on hold. Fifteen applications are not eligible for contracting and are awaiting withdrawal.

4.5.3 Funds Under Management
ICANN org received a comment from the ccNSO SOPC regarding the timing and amounts for transfers to the Supplemental Fund for Implementation of Community Recommendations (SFICR) and to the Reserve Fund. Board-approved transfers from FY21 net excess occurred both in July 2021 and October 2021. In July 2021, US$5M

was transferred to the Reserve Fund and US$15M to the SFICR. In October 2021, the ICANN Board approved a further allocation of US$10M to the Reserve Fund and US$5M to the SFICR. For presentation purposes, ICANN org decided to show the July 2021 transfers in FY21 balances, and the October 2021 transfers in FY22 balances. The chart had incorrect amounts labeled for the Reserve Fund and will be updated in the next version of the budget document.

The ccNSO SOPC inquired about the different rates of return between the Auction Proceeds and Reserve Fund. The difference in rates of return is due to the objectives and policies of each fund. For the Auction Proceeds, the objectives are to ensure that funds are safe and that capital is preserved until a decision on the use of the funds can be made by the cross community working group. The Reserve Fund is ICANN org's last resort to cover large expenses resulting from unavoidable, unpredictable or unplanned events that cannot be funded from ICANN's operating fund. The investment profile for the Reserve Fund has a medium investment horizon and a conservative-moderate investment objective to enhance return on assets. Please see section 3.3 Funds Under Management in the FY23 budget for a comprehensive view of the funds under management and investment policies.

ICANN org received comments on the growth and balance estimates for the Reserve Fund. The FY23 Reserve Fund balance is projected to be US$181M due primarily to return on investment growth. At the time of publication, the Reserve Fund balance was US$175M and a projection of 3.4% return was assumed for FY23. The Reserve Fund Policy states only the requirement for a minimum of 12 months of expected expenditures. If the Reserve Fund continues to grow significantly over its minimum requirement, ICANN org and Board will review the policy and assess potential changes.

4.5.4 Funding Assumptions and Projections

The BC inquired about why the FY23-27 Funding Assumptions and Projections project a reduction in contracted parties over the five-year period. The table on page 130 of the Draft FY23–27 Operating and Financial Plan and Draft FY23 Operating Plan portrays a declining count of contracted parties at both the low and base-case forecast scenarios. Both scenarios factor in the assumption of further contracted party consolidation, albeit at varying levels. Assumptions for each of the scenarios can be further detailed as follows:

- The base funding scenario, which provides a conservative appraisal of the growth of the contracted party base, assumes a decline of 58 delegated TLDs (equal to -5%) by the end of 2027. However, this decline is partly offset by the continued organic growth in the accredited registrar base, which is assumed to grow from 2,419 at the start of FY23 to 2,454 at the end of FY27.

- The low funding scenario, which aims to illustrate a depressed outcome arising from a decrease in all drivers to ICANN's funding, assumes a decline of 138 delegated TLDs (equal to -12%) by the end of 2027. In addition to the decline in

delegated TLDs, the low funding scenario assumes consolidation in the accredited registrar base, which is assumed to decrease by 436 accreditations (equal to -18%) over the forecast horizon. The overall accredited registrar base would decline from 2,419 at the start of FY2023 to 1,983 at the end of FY2027.

It is important to note that neither of these scenarios assume any further TLD delegations arising from the 2012 Round of the New gTLD Program, even though there might still be one or more delegated.

The ccNSO SOPC commented that the scenarios for funding vary widely between the low and high estimates of new gTLD transaction-based fees in the FY23 Draft Budget versus the FY22 Forecast. Given their relatively lower domain transaction volumes and competition among many companies, new gTLDs have thus far demonstrated higher levels of transaction volume volatility in comparison to legacy gTLDs. To account for this likelihood of fluctuations, a broader range of variance is being projected for new gTLD transaction volumes over the forecast period. The potential drivers and inhibitors at the low and high funding scenarios are outlined in the "new gTLD Transaction fees section" within Figure 4 of the [Funding Forecast Assumptions document](). In both low and high funding scenarios, the org assumes that the perceived impact to new gTLD transaction counts is greatest in the near-term, which explains the gradual contraction in annual percentage growth variance between the low and high scenarios over the progression of the five-year forecast horizon.

The BC also noted that ICANN org did not include any funding from meeting sponsorships in FY23 even though it expects to conduct three face-to-face ICANN Public Meetings. In general, ICANN org budgets funding conservatively. In years without travel restrictions, meeting sponsorships comprise quite a small percentage of ICANN's total funding. Because it is a small percentage and ICANN org budgets conservatively, the FY23 budget does not include expected funding for meeting sponsorships. If face-to-face meetings do occur as planned, any meeting sponsorships received would be noted as an unplanned funding versus the FY23 Budget.

4.5.5 Headcount
ICANN org received several comments about headcount assumptions in the FY23 Draft Budget. Below are responses separated by subtopic.

FY23 Headcount and Personnel Budget for Subsequent Procedures ODP
The BC noted correctly that 22 Full-Time Equivalents (FTEs) will be hired in FY23 to support the SubPro ODP. However, the average headcount of 423 and ending headcount of 427 (including 37 new hires) mentioned in the FY23 plans refer to that of ICANN Operations, which excludes both the SubPro ODP and the 2012 Round of the New gTLD Program. Please see the following subsection for more information about the FY23 Headcount and Personnel Budget for ICANN Operations.

The BC also inquired about the responsibilities of the ICANN org staff dedicated to the SubPro ODP. As referenced in the appendix of the FY23 Draft Budget document, the Board authorized a range of US$7-$9 million of direct expenses to fund the resources needed for ICANN org to initiate and conduct the SubPro ODP. This work will build the design and lead to a more efficient and effective implementation. ICANN org is using a general assumption that the SubPro ODP phase will be followed, after Board approval, by a phase of preparation for the next round of the New gTLD Program and, therefore, in many cases, FTE resources may be hired to handle the ODP work. Each FTE or temporary resource translates to approximately 1,800 working hours per year.

A key component of the expenditures will be additional personnel for ICANN org to increase its capacity. Some of the new resources will directly support the SubPro ODP, while some will backfill for existing positions that will be supporting the ODP (and program preparation work after Board adoption) and transitioning prior work. ICANN will be seeking a combination of temporary resources and FTEs to support this project. Work that is temporary in nature and will no longer continue once the SubPro ODP is completed will be handled by temporary resources whereas work that is to continue through the multiple phases of the project or become part of ongoing operations will be supported by FTEs.

FY23 Headcount and Personnel Budget for ICANN Operations
Several comments inquired about the headcount and personnel assumptions and classifications for ICANN Operations. ICANN org begins budgeting for headcount and personnel with existing staff. The FTEs and personnel dollars in ICANN org's service groups and functional activities (see section 4.4 of the FY23 Draft Budget document) reflect only the current state of headcount of ICANN Operations. ICANN org then budgets for new positions. The 37 new hires budgeted in FY23 roughly corresponds to the open positions that ICANN org is currently recruiting for across a variety of functions.

As comments noted, the 37 new hires are not allocated to specific service groups and functional activities. ICANN org budgets several months in advance and anticipates that throughout the fiscal year the functional teams will determine when new positions or resources are needed in light of planned work, undertaking new work as confirmed, or due to unplanned staff attrition. Because of the variables and unknowns, ICANN org leaves an amount of open positions unallocated to service groups and functional activities, and presents them at the total organizational level. As and when position requests have been submitted and approved (see subsection below for an overview of this process), they are accurately reported into the appropriate functional activities.

A few comments remarked that ICANN Operations headcount in FY23 is shown as 427 in some areas and 423 in others. The headcount total of 427 in section 4.4 of the FY23 Draft Budget reflects the FTEs at the end of the fiscal year, whereas other areas of the document refer to the average FY23 headcount of 423 throughout the fiscal year. The difference between ending and average headcount is due to the assumption that

headcount will be added gradually throughout the fiscal year. ICANN org reports both figures, as ending headcount is a better metric to understand capacity and resource planning while average headcount is a better metric to analyze costs. ICANN org will try to better clarify this distinction in the next versions of the plans.

The FY23 Draft Budget also includes a headcount projection for the FY22 Forecast and the ALAC inquired about how the yearly figures relate to each other. Due to some positions planned to be backfilled, the headcount subtotal of the FY22 Forecast does not perfectly align with the FY23 Draft Budget headcount subtotal. Please note that these subtotals are not the beginning headcounts of the respective fiscal years, but rather the ending headcounts as they relate to service groups and functional activities. As indicated above, not all new hires are allocated to specific service groups and functional activities.

Given the current headcount levels with only 3 months left in FY22, the ccNSO SOPC noted that ICANN Operations may have difficulty reaching FY22 Forecast headcount and inquired about the reasons. Due to recruitment challenges during the pandemic and the difficulty in finding appropriately skilled talent required for each position, ICANN org may not achieve the 410 ending headcount (405 average headcount) reflected in the FY22 Forecast. The org is working diligently to fill each open position as soon as possible and will update headcount projections after FY22 ends as part of the FY24 planning process.

ICANN Operations Headcount Growth in FY23 Budget
Regarding comments about the growth in headcount, ICANN Operations' workload is currently expanding in volume and complexity, creating the need to increase the number of staff and diversity of skillset. It is clear in the foreseeable future that the workload of the ICANN ecosystem is going to increase, specifically for the org, which is responsible for facilitating the community's development of policies and advice as well as implementing policies, advice, and recommendations. Some examples of projects that new resources will support include but are not limited to: (i) addressing approximately 250 recommendations from reviews and CCWGs (e.g., ATRT3, SSR2, CCT, RDS, WS2, Effectiveness of the Multistakeholder Model (MSM), and others); and (ii) the RSS governance model. In addition, there are other initiatives outside of ICANN Operations, such as the next round of the New gTLD Program and a grant distribution program of the auction proceeds, which will have separate funding and require additional resources. The workload expansion driven by these projects and activities is also expected to require a strengthening of the organization's support infrastructure, such as support functions and systems.

The ALAC inquired why the headcount for years after FY23 is not higher given the increased workload in ICANN Operations. While headcount is projected to increase through FY23, ICANN org has assumed that ICANN Operations headcount will remain flat throughout the five-year period of FY23-27. This projection assumes that ICANN org will be able to meet its needs with the increased personnel resources given the current

or near-term workload of ICANN Operations. As new projects get approved by the Board, the org will reassess headcount projections in future planning processes.

Process for Adding Headcount

The GNSO and ccNSO SOPC sought to understand ICANN org's process for adding headcount. When an ICANN executive requests a new position or to replace an existing vacant position, the request must be approved by the President and CEO, the SVP, Planning and CFO, and the SVP, Global Human Resources. These three executives e CEO, CFO, and SVP of Global HR meet monthly to review the org's headcount level and the list of hiring requests submitted and justified by each Executive with HR's help. This systematic process allows the organization to strategically evaluate each new hire, controlling headcount levels, and ensuring proper allocation of resources. This measure and other measures help ensure that the org has adequate headcount to accomplish its strategic and operational goals, and have helped the org maintain a stable headcount over the past five years.

In addition, ICANN org utilizes an internal volunteer program for short term needs that also provide a development opportunity for staff internally, and leverages temporary labor for some needs when available and appropriate. Adding new positions is not always the best solution for resource needs and ICANN org is therefore strategic and thoughtful about increasing headcount. ICANN org recognizes the importance of a structured and carefully considered approach to the approval of both additional hiring or back-filling existing vacant positions in order to be good stewards of ICANN's funding and to ensure permanent hiring decisions are long-term focused.

4.5.6 Contingency

The BC inquired about how contingency has been used in the past. Historically, among other things, contingency has been used for unplanned legal matters, IT equipment, short-term contractors, and resources for the Information Transparency Initiative (ITI). For the FY23 Budget, ICANN org has again budgeted for contingency to maintain a 4% level which, in the past, has been adequate for absorbing unplanned activities like those mentioned above.

The BC also requested a financial estimate for General Data Protection Regulation (GDPR) compliance. For the past three fiscal years, ICANN org has spent between US$1 million and US$2 million on legal matters related to GDPR compliance which has been funded from contingency. ICANN org anticipates this level of spending to continue in the short term.

4.5.7 Supplemental Fund for Implementation of Community Recommendations

The Supplemental Fund for Implementation of Community Recommendations (SFICR) is newly created and has not yet been used for any project. The BC noted that while the current balance of the SFICR is partially the result of lower than planned costs in recent years, future contributions to the SFICR are not certain. Driven by travel restrictions

caused by the pandemic, the org has had lower than planned costs over the past two years. As a result, ICANN org had excess in its Operating Fund which was used to enhance the Reserve Fund balance as well as create and add to the SFICR. While the org is not planning to have excess in the FY23 - FY27, it is likely that future costs will come in lower than planned as ICANN org takes a conservative approach to planning. Moreover, if projects get approved for SFICR funding and the balance decreases, the org has the option of planning for a SFICR contribution in future planning cycles. Between these approaches, the org is confident that it can keep an adequate balance in the SFICR to fund projects.

The RySG asked why ICANN org would need to utilize SFICR funding if the SSAD would operate on a cost recovery basis. If the SSAD implementation plan is approved by the Board, it will require significant up-front costs to launch – ICANN org would then propose to the Board to utilize the SFICR to launch the SSAD implementation plan. Eventually, when the SSAD program is fully operational, the pricing will be structured in a way for ICANN org to recoup the up-front costs. The cost recovery program refers to the recoupment of the up-front costs before the SSAD program is fully operational.

The BC also remarked if the SSAD costs consume the SFICR, there are several community recommendations that would not get addressed. As stated above, the org is confident that the SFICR will maintain an adequate balance and will only be used for the up-front costs of SSAD before it becomes a cost recovery program. In addition to funding the SSAD implementation plan, if approved, the SFICR can be used to fund Board-approved community recommendations if implementation of them fit within the SFICR criteria. ICANN org's Planning Prioritization Framework, in which the community participates, will drive the prioritization process for implementation of Board-approved community recommendations. Once a project has been prioritized, the org will then determine how it should be funded (e.g., operational budget, contingency, SFICR, etc.) and funding projections will be presented in the following planning cycle. For more information about the prioritization framework, please see the Prioritization section (4.2.1) in the Operating Plan section of this report.

4.6 Other

The ccNSO SOPC appreciated ICANN's response to the questions raised during the 23 January 2022 Joint ICANN Planning and SOPC engagement meeting. For transparency, the two questions related to WS2 Implementation progress reporting and related information and costs associated with establishment of the IRP Standing Panel. In regard to WS2 implementation details, ICANN org invited the ccNSO SOPC and the community to visit the wiki page here: https://community.icann.org/display/IO/WS2+Implementation+Status. It includes the status of Board-approved recommendations implementation by the org, as well as charts indicating progress of implementation. It does not, however, include any community groups' implementation status. Please feel free to reach out if you have any additional questions about WS2 implementation.

Regarding the question about the Independent Review Process (IRP) Standing Panel. ICANN org work to establish the IRP Standing Panel is currently underway. There will be a variety of costs for the onboarding and maintenance of the initial standing panel, but it is difficult to estimate what those costs are or when they will be realized. ICANN's Draft FY23 Budget has sufficient resources to absorb these costs, and future plans will have a clearer picture of continued panel onboarding and maintenance costs.

As regarding the RySG's request for future engagement about the details in the planning documents, ICANN org appreciate the RySG's interest and continuous participation in the planning process. For any further inquiries, please reach out to the planning team at planning@icann.org. The team will be pleased to assist with any further information, clarification, and engagement as needed and requested.

ICANN org appreciate the GNSO's comment during this Public Comment process and its indication of continued support throughout the upcoming Empowered Community process.

ICANN org appreciates all community input and support in this Public Comment process. The org reviewed and responded to all comments received, and where appropriate, will incorporate the comments into the next version of FY23 planning documents or, will evaluate and incorporate into the further planning cycle as appropriate.

Section 5: Next Steps

Following the publication of this report, ICANN org will revise the Draft FY23-FY27 Operating and Financial Plan and the Draft FY23 Operating Plan and Budget, taking into consideration the Public Comments, and where appropriate and feasible, incorporate the comments into the next version.

The ICANN Board Finance Committee will consider recommending to the ICANN Board the adoption of the FY23-FY27 Operating and Financial Plan and the FY23 Operating Plan and Budget in May 2022.

Following the ICANN Board's adoption of the FY23-FY27 Operating and Financial Plan and the FY23 Operating Plan and Budget, the Empowered Community may consider whether it will reject the plan as adopted. So as long as no Empowered Community rejection process remains pending, the FY23-FY27 Operating and Financial Plan and the FY23 Operating Plan and Budget will go into effect on 1 July 2022.

Section 6: Appendix

The tables below contain all comments received. 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 that displays the section of this document containing the response to the submitted comment.

6.1 Public Comments Received

Submitter Organization	Question/Comment	Reference to Section of Staff Report where Response can be found
ALAC	There is still no fulsome way to follow progress on the full set of multistakeholder model (MSM) issues identified in community discussions. In addition, there is no overall strategy to recognize efforts—especially community-led efforts towards those initiatives. We reiterate our suggestion made last year, that there be a regular, inclusive (all issues) progress report to stakeholders, including a call-out to communities for contributions.	Section 4.3.3
ALAC	The ALAC and At-Large community do not wish to see the Holistic Review delayed. This pilot, set to deliver a first Holistic Review, to identify information gaps and challenges, should be organized before ICANN74 so that the actual review can begin the 1st of July 2022 (1st day of FY23). The Continuous Improvement program of all SOACs will be an ongoing effort, in parallel with the new Holistic Review. Budget allocation must be provided in FY23 and beyond, in order to ensure its completion before a second Holistic Review no more than 2.5 years after the initial implementation of recommendations from ATRT4.	Section 4.3.3
ALAC	The ALAC recognizes the need to collect this data, but the real emphasis should be on education and support mechanisms to make better use of the diversity we already have in our ranks. At-Large, given its RALO-based structure, is already a very diverse community. The challenge is to make sure there are accessible entry points for all who wish to participate. We would also like to emphasize that diversity must be evident at all levels, most particularly at all leadership levels, including the Board of Directors. To this end ALAC and At-Large welcome the recent Request For Proposals call for the proposed DEI Consultant on 14 January 2022, to facilitate this important process and aid in, amongst other things, the development of the DEI Toolkit as recommended in WS2 Rec 1.6.	Section 4.3.3
ALAC	The ALAC would like to know how and when the evaluation of progress will take place, regarding the work identified to date in Evolving the ICANN Multistakeholder Model. We would also like to see regular reporting showing progress or lack of progress in the issues identified.	Section 4.3.4
ALAC	The ALAC notes that the FY22 operating plan for the operating initiative,	Section 4.4.2

	"Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policy Making" (p.37) acknowledged the possible need for a program or project manager to support the full breadth of the community's policy projects and activities. It was expected that the outcome of the planning and prioritization process would demonstrate the extent to which additional staff was needed and what type of skills and expertise might be necessary. Is the position of project manager mentioned in FY22 now redundant, or has this been incorporated into an existing staff role?	
ALAC	The ALAC would also like to have a staff member specifically assigned as policy support for the At-Large community.	Section 4.4.2
ALAC	The draft budget does not seem to be in line with the ATRT3 recommendations both for periodic review by community groups, and particularly for the recommendation for a 'Holistic Review.'	Section 4.4.12
ALAC	The ALAC notes that $1.7M has been allocated to support this set of initiatives. We suggest that the crucial process of bringing new participants into the ICANN process and keeping them deserves a higher level of support. Since the purpose of this activity is to increase diversity and lower barriers to participation, which directly addresses the multistakeholder model issue of recruitment and demographics, we suggest that funding in this area be increased to $2.2M and that $.5M be made available for innovative education and recruitment programs suggested by the community.	Section 4.4.6
ALAC	We appreciate the navigational improvements in the budget documents. With respect to reorganization of content, we note that last year's "strategic goals and targeted outcome supported" section within each operating initiative has been omitted. If Appendix B is meant to replace this section, a great deal has been lost in translation. The Appendix provides none of the colour that was previously included. We feel that this has been a loss—making it more difficult, especially for newcomers, to gain a comprehensive view of the scope and intent of the activity.	Section 4.1
ALAC	We also no longer have the 5-year financial estimate—which was interesting to us.	Section 4.2.3
ALAC	The ALAC appreciates the 5-year road map provided and suggests this method could/should be used to track other elements of the plan.	Section 4.1
ALAC	The ALAC reiterates our previous comments that tracking and progress evaluation has to include qualitative as well as quantitative measures. We have suggested facilitated focus groups which are designed to take a deeper dive into the meaning of the data collected. Numbers alone only tell part of the story.	Section 4.2.2
ALAC	We appreciate the navigational improvements in the budget documents...The ALAC is pleased that the Plan is easier to digest than in previous years.	Section 4.1
ALAC	We note that the strategic planning is to include ACs and SOs, starting in FY23 for FY24. There is no additional budget set out for this, and we question whether that will accommodate possible additional costs including facilitators and translation for meetings—which, at this stage, are to be face-to-face. These	Section 4.4.11

	facilitators should help on the possible training for designated SOs and ACs representatives in the chosen strategic planning tools, prioritization of initiatives and activities, among others.	
ALAC	The ALAC notes that inflation does not seem to be taken into consideration for expenses, although inflation is rising in the US and Europe.	Section 4.5.1
ALAC	Further, the number of full time employees (FTE) is set at 427—the same as for FY23—but elsewhere, the documentation talks about new initiatives, with more people to be needed. Will the planned additional staff be temporary, or should the FTE headcount for at least FY24 be larger?	Section 4.5.5
ALAC	The Reserve Fund increase is significantly higher than other funds—at 3.48%.	Section 4.5.3
ALAC	On new gTLD funds listed, are the costs being funded through the new gTLD program, or through general operations?	Section 4.5.2
ALAC	Are there remaining new gTLD names to be assigned from the 2012 round?	Section 4.5.2
ALAC	There is a significant increase in headcount (from 395-427) which was not in the previous year's budget. Why the increase?	Section 4.5.5
ALAC	In the expenses service group, the costs are assigned based on the actual FTE, but at the bottom, there is a general basket of 37 (nearly 10% of the actual FTE) without breakdown. Is there an explanation for where they will be within ICANN org?	Section 4.5.5
ALAC	From the table, the FTE for years FY22 and FY23 does not seem to correlate. FY22 starts at 387 and ends at 410, FY23 starts at 390 and ends at 427.	Section 4.5.5
ccNSO SOPC	Summary: It is noted that additional locations of IMRS large "clusters" will require additional year-on-year funding to cover connectivity, colocation, and power costs. It is further noted that additional locations of IMRS large "clusters" will require year-zero capital expenses funding followed by year-two maintenance and hardware upgrades to maintain stability and resiliency. Comment: The SOPC agrees with the proposed changes.	Section 4.4.1
ccNSO SOPC	Summary: P119, final paragraph Security is paramount under the present circumstances for each member of the community Comment: It is unclear to the SOPC if and how the effort as described would contribute to the very serious challenge. The language is very vague	Section 4.4.14
ccNSO SOPC	Summary: page 96 △ Establishment of a contract management database. It is our understanding that the contract management database will be a kind of legal support, under ICANN org governance. We also understand from the text that currently there is no database where the full history of contracts is captured. Therefore, problems like original contracts missing may happen. The database may also facilitate the trans-community legal experience exchange. Comment: The SOPC supports the initiative but notes it is couched in general terms. Operational questions like how to collect the past contracts? What is the form of the database, a software or an offline system? Who has access to the	Section 4.4.10

	database? Will determine the resources needed and efforts required. It is therefore strongly suggested to include a KPI to monitor progress.	
ccNSO SOPC	Summary: page 96 △ With the current global environment, there has been an increase in the services provided by Governance Support to aid the org's response to the pandemic. Comment: The SOPC notes this is mentioned under ICANN org governance. However, it is unclear to the SOPC why it is limited to ICANN org Governance. The SOPC assumes that in other areas the workload during pandemic has increased as well	Section 4.4.10
ccNSO SOPC	Summary: We understand that there is an "Increased need for professional service contracts to cover specialized events and information gathering. " Comment: The SOPC believes that the proposed changes are fairly broad and vague, making them open to interpretation. We would expect to see more focused and precise language.	Section 4.4.7
ccNSO SOPC	Summary: Management of ICANN and PTI Boards. Page 81: △ "Increased participation in arenas that ICANN has not previously engaged as the locus of political action that can impact ICANN shifts" Comment: The SOPC notes that this is not directly relevant for ccTLDs. However, the SOPC notes the activity is described vaguely and therefore the SOPC believes it will be difficult to draw any clear conclusions on whether the goal is achieved or adds value.	Section 4.4.7
ccNSO SOPC	Summary: Page 84 △△ In FY 23–27, Global Communications anticipates adding writers, digital and media specialists, and a graphic designer to the team to better support each function. The Global Communications team will use tools, such as social listening, media monitoring, and Google analytics to track key metrics including: blog and announcement reach, content likes, retweets, shares, etc. Resources FY23–27: Resource requirements are expected to increase, as the team has requested the addition of staff to increase capacity. Comment: The SOPC wonders whether ICANN has an organization-wide Brand and Communications Manual? If so, can it be shared and circulated widely in the community to provide guidance on how the ICANN Org and Community Brand is used? The SOPC believes this can save the resources needed for additional Communication Staff. The SOPC believes that with a proper Brand and Communications Manual and well thought out implementation Strategy, a lean team can lead the Communications function in partnership with the Community.	Section 4.4.8
ccNSO SOPC	Summary: "In conjunction with the Leadership Program and following community requests, PRS will facilitate a community-led Intercultural Awareness Program training session aimed at raising community awareness and understanding of cultural norms and best practices across regions." Comment: The SOPC wonders whether this program is limited to community leadership or is developed for the entire community? The SOPC also questions the added value or benefit therefrom, taking into account the effort it would	Section 4.4.6

	require from both ICANN and the community at large to achieve sustainable and concrete results.	
ccNSO SOPC	Summary: GSE also assumes that travel costs will increase as in-person gatherings resume from historically low levels due to the pandemic. Community demand for support with regional events is likely to continue to increase. Comment: The SOPC notes that this assumption may be not right as future meeting models probably will be more hybrid, so travel costs may stay at the same level as the previous 5-year period. It is not clear on which model this is based, and ICANN is invited to share a clarification thereon.	Section 4.4.5
ccNSO SOPC	ICANN and the community have done well remotely during the pandemic but F2F interactions should enable better collaboration and results. We support the budgetary assumptions to fund three face-to-face meetings to avoid the need to adjust the budget. Having said this, we do wonder if perhaps one of the three annual meetings could become fully remotely , distinct from the envisioned F2F. Has ICANN given any thoughts to such an arrangement?	Section 4.4.9
ccNSO SOPC	Summary: P. 61 △ Particular study and research requests may require procurement of professional services, e.g., consumer or registrant surveys, extension of statistical analysis of DNS abuse in gTLDs, or economic analysis Comments: The SOPC notes that the referenced analysis is only on DNS abuse in gTLD to the exclusion of ccNSO requests	Section 4.4.3
ccNSO SOPC	Summary: Contracted Parties Services Operations p.62 Manage all aspects of vendor lifecycle from procurement to operations for vendors that provide contracted party services, applicant evaluation, or related needs. Support 2012 round of the New gTLD Program, including: ○ Application processing (evaluation, contention resolution, application change requests, etc.). Comment: The SOPC notes a reference to the 2012 round. The SOPC wonders if ICANN org is still accepting/processing applications for the 2012 round of the New gTLD? If so, would this impact the next round?	Section 4.4.4
ccNSO SOPC	With respect to budget funding assumptions, the scenarios for funding (medium, high, and low estimate) vary widely - fluctuating between 19% decline and 17% growth – can ICANN staff explain in more detail how they arrived at these assumptions?	Section 4.5.4
ccNSO SOPC	Summary: p.104: △ With the current review cycle completed (with resulting implementation work in progress), the focus of work for the Review Support and Accountability team in FY23 will be on the preparations for the implementation of review-related ATRT3 recommendations subject to prioritization (see below), as opposed to the support and facilitation of reviews, as in prior years. The new Holistic Review recommended by the ATRT3 serves as a critical dependency for the scheduling and timing of all future reviews. Therefore, the Holistic Review pilot that the Board directed ICANN org to initiate (subject to prioritization and available resources) could be prioritized for planning and implementation ahead of other ATRT3 and community-issued recommendations. While the timing of this cannot be determined at the time that	Section 4.4.12

	this plan is being developed, ICANN org recognizes the possibility of work toward initiation of the Holistic Review pilot taking place in FY23. Comment: The SOPC does not understand what is meant by this paragraph. What is the result of this effort? In FY 23 preparation will start, without a clear understanding of what will need to be implemented and in which order (subject to prioritization and available resources). It is also unclear whether this activity includes and is dependable on the availability of community members? The SOPC would appreciate it if the description of the activity could be clarified, including whether there is any need for community involvement.	
ccNSO SOPC	Summary: p.107 Resources FY23–27: During FY21 and FY22, ICANN org has initiated and continued to increase resources focused on implementation work, in support of the implementation of review recommendations resulting from the recently completed cycle of specific reviews. As reviews are streamlined and improvements or changes made to how ICANN org supports reviews throughout their lifecycle in alignment with the Board-directed actions resulting from ATRT3 recommendations, any resourcing adjustments to ensure strong ICANN org support will be addressed. Note: the resources needed to support the next cycle of reviews will be impacted by the outcomes of various work streams to improve reviews in alignment with Board-directed actions to implement ATRT3 recommendations, such as budget amount, staff, and timing. These resource items will be forecasted once the improvement work is further along. Comment: The SOPC does not understand the resource implications: is there a need for additional resources in FY 23 and going forward? What are parameters that define this need?	Section 4.4.12
ccNSO SOPC	The SOPC appreciates and commends ICANN for its continuous efforts to make the Planning documents more accessible for the general public. Although the length of the basic documents may be challenging to examine them in full, the SOPC compliments ICANN to further structure the documents and by indicating new activities and changes in comparison to last year's Five Year Operating and Financial Plan.	Section 4.1
ccNSO SOPC	From the very onset back in 2009, the SOPC reiterated the need for ICANN (org, Board and Community) to balance the workload and resourcing by setting priorities. The SOPC commends ICANN org for initiating the discussion to define a Prioritization Framework. However the SOPC notes that to date priorities have not been set through such a mechanism. The SOPC urges ICANN to complete such a Framework i.e define the rules to select major projects and other initiatives and act accordingly before ICANN org, Board and community make major long-term commitments in terms of people (including time of community members), time and other resources. For example, in the short to mid-term the SOPC is concerned about the impact on other projects and activities of the implementation of the SubPro recommendations and SSAD, particularly if they are to be run in parallel (see also below Section 3 sub b. of this document) and in parallel with other major programs as implementation of the WS 2 Accountability and ATRT3 recommendations. The SOPC believes that results of the Operational Design Assessments or	Section 4.2.1

	similar ex-ante assessments should be embedded in such prioritization efforts and be used to balance the workload and the resourcing required from the ICANN org, Board and the community.	
ccNSO SOPC	The SOPC submissions from 2017, 2018, 2019, 2020 and 2021 all included comments on the definition and relevance of some of the metrics and related Key Performance Indicators included in the various sections of the planning documents. The SOPC appreciates and understands that it is sometimes difficult to define relevant metrics and KPIs, particularly for non-transactional activities. However, if they are defined and included, we expect them to be useful both to ICANN and the community to monitor progress and identify issues, if any, with respect to the development, adoption and implementation of community recommendations or other activities for the benefit of (parts of) the community. Again, the SOPC notes some areas in the FY 23-27 Operational Plan where metrics and/or KPI's are only rudimentary defined, or even absent. Going forward we therefore suggest that ICANN org, the Board and community jointly review the current non-transactional metrics and KPIs to assess whether they measure what they are supposed to measure, for example progress of the project or activity against the stated goal, relevance from a community perspective etc. The SOPC is well aware that this would again imply additional use of the ICANN org and community's resources and that the process needs to be defined. However, we do believe that such an effort would ensure enhanced support from the community and facilitate the management of all the projects and activities from an ICANN Org and community perspective.	Section 4.2.2
ccNSO SOPC	Summary: To supplement the support provided by existing staff, professional services are a cost-effective, flexible way to supplement full-time staff that don't require highly specialized skills, and should be considered along with additional hiring. Comment: The SOPC agrees with the approach; however, the amount should be limited otherwise it is a "blanco cheque" for adding working force. In more GENERAL terms it is advised that a limit should be set upfront for EACH department of ICANN in terms of FTE and the ratio of professional services used. The SOPC noted that the last 12 years ICANN org has increased from a little bit above 100 FTEs to more than 400% of that number.	Section 4.5.1
ccNSO SOPC	Summary: page.102 Resources FY23–27: Resource requirements expected to increase. △ Support establishing a systematic set of activities to support the annual planning process of a five-year horizon. △ Strengthening of Strategic Outlook trends monitoring Comment: The ccTLD community is in need for predictable, balanced, accurate and realistic planning, rather than just an array of planning activities with vague KPIs and eventually being a self-servicing instrument. Rather than increasing the planning efforts other or additional monitored processes and introduced indicators may achieve the same result. Examples of such re-definition could be the number of planned indicators-to-attained indicators ratio; the number of staff	Section 4.4.11

	's planned indicators-to the number of community indicators ratio; etc. The SOPC is therefore not convinced that the proposed changes contribute to the stated goal.	
ccNSO SOPC	The SOPC appreciates the clarifying responses on two questions raised during the 12 January joint ICANN Planning and SOPC session. The two questions related to WS2 Implementation and costs associated with establishment of the IRP Standing Panel.	Section 4.6
ccNSO SOPC	The SOPC notes that the FY23 Operational Plan includes 2 activities that may result in very costly programs, which could have major implications on the workload of the org, Board and community: SSAD and implementation of SubPro policy recommendations. The SOPC understands that ICANN org has introduced the Operational Design Assessment to provide an ex-ante assessment of resourcing needed to implement and execute the recommendations. It is also suggested that the Supplemental Fund for Implementation of Community Recommendations will be used to finance these major efforts. The SOPC would like to understand if these two major activities will be run in parallel, and if so, how this would impact the resourcing (by org and community) and funding. The SOPC would also like to understand if and how implementation of these major efforts impacts existing work and priorities, and how ICANN intends to ensure that these two efforts do not overtake other initiatives going forward.	Section 4.2.4
ccNSO SOPC	The chart in 4.4 on page 17 shows 37 FTE budgeted new hires for ICANN Ops without showing for which Service Group/Functional Activity. Can ICANN staff give more detail on where it expects to deploy these 37 new hires and what activities they will support? In addition, the chart in Section 3.2 (Average Headcount) on Page 9 shows FY23 Draft Budget for 448 headcount. Compare that to FY22 Forecast: 406 (note that the numbers for the FY22 forecast actually add up to 407); the increase is 41 or 42. While the 37 are for Ops and the 41 or 42 are for more than Ops, this area is a little confusing and more detail/clarity would be appreciated.	Section 4.5.5
ccNSO SOPC	The projected Reserve Fund at the end of FY23 is $181.3 million (Section 3.1, page 6). This appears to be in excess of the target for Reserve Funds - one year of operating expenses as the minimum target level. Operating expenses are projected at $152 million (Section 4.1, page 13). We understand the Reserve Funds can exceed the minimum target level, but these figures project a nearly 20% excess above projected annual operating costs. Noting that ccTLDs support a strong Reserve Fund, can ICANN staff explain in more detail the thinking behind this projection for FY23?	Section 4.5.3
ccNSO SOPC	There is significant growth in expenses, mostly from the personnel costs, face-to-face meetings, and professional and admin costs. Is ICANN staff confident that this level of expenditure growth can be accommodated effectively and add value to the community? Also, it appears ICANN will not reach the budgeted headcount (405) for 2022. Is there any	Section 4.5.1

	particular reason for not reaching this budgeted headcount ?	
ccNSO SOPC	Can ICANN staff comment on ongoing efforts toward cost optimization as requested by the SOPC at previous occasions? Is this a priority with respect to the budget?	Section 4.5.1
ccNSO SOPC	In Section 3.3, Funds Under Management, the chart on page 10 shows certain transfers to SFICR and the Reserve Fund in FY21 yet the text on page 11 indicates these were made in FY22 – and the timing of the contributions to the Reserve Fund appear to be incorrect, i.e. was the transfer of $5M to the reserve fund in July or October, and same question for the $10M transfer	Section 4.5.3
ccNSO SOPC	Interest gains. It looks like Auction Proceeds funds are projected to gain interest in FY23 at approximately 0.5%. The increase in FY23 Reserve Funds appears to be a larger percentage, 3.4%. Is that correct? If so, why the differential, and should investment approach be changed for Auction Proceeds?	Section 4.5.3
GNSO	The FY23 OFP indicates that "the FY23 level of resources is generally expected to be consistent with the current level of staff, assuming that FY22 hiring requests are fulfilled and continuing ability to rely on professional services contractors for additional needs." In FY23 the level of resources allocated to this Functional Activity indicates 36 FTE and $8.0M USD, which is an increase of 2 FTEs since 2022 and an increase of $0.9M USD in personnel expenses. The GNSO is pleased to see the planned addition of staff. The two additional staff will be critically important to ensure that there is adequate support for policy development and implementation efforts. However, neither the FY23 OFP nor FY23 Budget provide insight for their readers into the factors analyzed by ICANN org to determine if staffing is adequate. Moreover, the FY23 OFP correctly identifies that (i) the need for data-driven policymaking results in requests for more robust data collection and analysis as well as external experts to aid in policy development; (ii) policy challenges (such as the SSAD) facing the community are becoming more legally and technically complex; and (iii) the growing complexity of the issues along with their broad impact and diversity of stakeholder interests (e.g., on data privacy and DNS abuse) means that significant time and effort needs to be expended on understanding the issue and multiple viewpoints in order to find consensus. In addition, the GNSO Council would point out that the following work is forecasted for the FY23 time frame: In light of these risk factors, the GNSO Council is happy to engage with ICANN org on the future work of the GNSO, the factors examined by ICANN org for personnel resource decisions and best-practices for project management staffing. [Note from Planning team to Planning Liaison, see p2 of GNSO letter on PC proceeding, which displays the FY23 schedule of work on p2 of its submission: https://www.icann.org/en/public-comment/proceeding/draft-fy23-27-operating-and-financial-plan-and-draft-fy23-operating-plan-and-budget-15-09-2021/submissions/council-gnso-07-02-2022]	Section 4.3.3
GNSO	Maintain adequate non-personnel resources for Policy Development Support. In the GNSO Council's comment on the FY22 Budget, we pointed out 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	Section 4.4.2

	evaluate whether the recommended changes associated with PDP 3.0 were being adequately funded. The GNSO Council acknowledges that most of PDP 3.0 has been implemented and that its various tools and resources are covered by the Policy Development and Support Functional Activity section of the FY23 Budget, and, in particular, the Technical Services and Contingency subsections. The GNSO Council will continue to provide a review and analysis of these budget sections on a recurring annual basis.	
GNSO	With respect to the section in the FY23-27 OFP, How Progress is Tracked, the GNS recommends that ICANN Org includes a goal to publish reports on the number of in-country engagements by ICANN Org/Affiliates at Fora (e.g., Internet Governance Forum) where potentially impactful issues are discussed, such as cybersecurity, data protection, privacy, cultural and geographic identifiers, emerging technologies, and proposed new systems of unique identifiers.	Section 4.3.10
GNSO	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. For instance, it would be important for the GNSO Council to understand the percentage of budget resources for Policy Development and Advice that was dedicated to the GNSO. Such information is essential for each of these groups, including the GNSO Council to hold ourselves, and others, mutually accountable to responsibilities, and expected level of performance and efficiency as good stewards of the funds allocated to these groups.	Section 4.5.1
GNSO	The GNSO Council seeks to ensure that the annual Operation and Financial Plans and annual Budgets provide Working Group Chairs with tools and support to ensure effective and efficient leadership. We were pleased to be informed that the enterprise-wide project management software has been purchased, and to see the planned addition of two full-time employees since the adopted FY22 FTE levels. In addition, the GNSO Council is informed that certain specific expenses for important policy-making tools, such as software and consultants, are covered in areas of the budget that appear well-funded.	Section 4.5.1
GNSO	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. In its comments on the FY22 OFP, the GNSO Council noted that there had been no increase in the FY22 OFP as it pertains to resources dedicated to collaboration and planning for future ICANN Policy Work. Like the FY22 OFP, the FY23 OFP provides no detail concerning resources dedicated to planning because "Resources for this initiative are included within the functional activities of the financial plan." These activities are especially critical as in FY23 ICANN will implement the draft prioritization plan during the planning process of the FY24 OFP.	Section 4.3.12
GNSO	The GNSO Council was pleased to see those additional resources for	Section 4.2.4

	coordination and "appropriate tools" were contemplated in the estimates of resources for the Policy Development and Advice Functional Activity. However, no further details are provided as to where these additional resources will be drawn from, such as the Supplemental Fund for Implementation of Community Recommendations (SFICR), the IT budget or contingency budget.	
GNSO	In the GNSO's comment on the FY22 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. The GNSO Council was pleased to see that 36 FTE are budgeted. In the joint meeting between the GNSO Council's Standing Committee on Operations and Budget (SCBO) and the ccNSO Strategic and Operational Planning Committee (SOPC), there was discussion with the ICANN Finance & Planning team concerning these committees gaining a better understanding of the process and factors that ICANN org undertakes to determine staffing needs. The SCBO looks forward to engaging with ICANN Finance and planning and the SOPC on this topic in the future.	Section 4.5.5
GNSO	The GNSO Council appreciates this opportunity to share our perspectives on these important issues. As the GNSO is a part of the Empowered Community we look forward to reviewing all inputs from the public comment process which addresses ICANN's broader strategy and budget. Finally, the GNSO Council would be happy to answer any clarifying questions that you may have regarding the contents of this document.	Section 4.6
RySG	● 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. ● 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 and how the community and ICANN org can coordinate on our support of the MSM. We appreciate ICANN's continued efforts to increase transparency on these issues.	Section 4.3.3
RySG	● The RySG continues to emphasize that a critical aspect of facilitating effective decisionmaking in the policy process is properly scoping work efforts to include specific objectives with precise and manageable tasks. ● ICANN should consider providing increased training and support for chairs and leaders of ICANN work efforts (including Reviews, PDPs, CCWGs, etc.). Registries are appreciative of the continued strong staff support that provides resources for Chairs to be able to accurately summarize discussions and drive toward decisions as it s also critical to efficient and effective work of PDPs and WGs. ● While we agree that diverse membership and efficiency of the SOs and ACs is important to a strong MSM measures of progress on efficiency and effectiveness should review the full lifecycle of decisions, and therefore also include measures related to Board activity that contributes to the progress on work items, and not only the "Completion of implementation of Board-approved recommendations from Organizational Reviews."	Section 4.3.4
RySG	● 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	Section 4.3.1

	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.	
RySG	● We would welcome 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. ● There are several "Considerations" that may impact the proposed work on this initiative. It would be helpful to have a bit more information on the expected impacts or potential solutions associated with the "Considerations."	Section 4.3.2
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. ● Staff retention is an absolute necessity for the success of PTI / IANA functions.	Section 4.3.7
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.	Section 4.3.8
RySG	● As with initiative 9, the RySG believes that an effective GAC is a crucial part of an effective multistakeholder model for ICANN.	Section 4.3.9
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	Section 4.3.10
RySG	The RySG looks forward to progress on the Auction Proceeds recommendations. More insight into the timeline for these items would be beneficial.	Section 4.3.11
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.	Section 4.3.6
RySG	The RySG appreciates ICANN's effort to provide comprehensive and detailed	Section 4.1

	documentation, and efforts to thoroughly plan and track expenditure. We acknowledge the important improvements in recent years to how the information is presented and shared with the community. This said, the ICANN planning and budget documents remain a massive and challenging amount of information to deal with from a community and volunteer perspective.	
RySG	As mentioned as well in our comments on the 2021 documents, the plans do provide a substantive overview of the full range of actions and initiatives, but miss providing 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.	Section 4.1
RySG	While replicating the documents' structure and content, and indicating new initiatives (with a delta (Δ)) provides transparency, a red-line or comparison version that shows what has changed from year-to-year would be extremely helpful.	Section 4.1
RySG	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 years, and situates the current state of initiatives compared to its ultimate goal(s).	Section 4.1
RySG	We suggest that ICANN compiles specific questions for key issues that ICANN is seeking community guidance on. These questions should intend to enhance the focus for specific comments, but not limit or exclude commenting on other issues.	Section 4.1
RySG	The RySG welcomes the continued focus in FY23 on the implementation of CCWG-WS2 recommendations and the Enhancing the Effectiveness of ICANN's Multistakeholder Model work plan, but is looking forward to the rollout of the planning and prioritization framework that was launched at the end of FY21.	Section 4.3.12
RySG	There are some areas where information is provided but more granular transparency may be beneficial to some groups. Could ICANN provide a clear avenue for requests for specific information?	Section 4.6
RySG	More detail around the use of funds in the SFICR would be welcome. For example: $20m has been set aside in the SFICR for use should the Board approve the SSAD implementation plan. Current estimates out of the ODA suggested that the goal is to have the SSAD operate on a cost recovery basis. What then, are the expected uses for the dedicated SFICR funds?	Section 4.5.7
RySG	We appreciate the commitment to the ongoing work that ICANN Org has engaged in with the ICANN community and the Board as it works on researching and developing prioritization efforts in this regard. We view this work as essential and look forward to continued coordination and cooperation in these efforts.	Section 4.3.12
RySG	As noted above, the RySG supports the ongoing activity to replenish the Reserve Fund from surplus operating funds. 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. | |

6.2 Public Comments Received After the Public Comment Period Deadline

Submitter Organization	Question/Comment	Reference to Section of Staff Report where Response can be found
RrSG	The Registrar Stakeholder Group (RrSG) welcomes the opportunity to comment on the ICANN Draft FY23-27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget. Overall, the RrSG is pleased to once again see more information, detail and explanations than used to be provided.	Section 4.1
RrSG	The RrSG notes that an allocation for new gTLDs has now been included in the FY23 budget. Its prior absence is something the RrSG previously commented on and so we appreciate that ICANN have taken on that feedback.	Section 4.5.2
RrSG	The FY23 budget (p19) outlines constituent travel by SOAC and illustrates that travel costs, if divided by the number of people the amount is allocated to, differ between the groups. Although most groups have similar per-individual costs (around $2,900 USD for ICANN75 & ICANN77 and $2,400 USD for ICANN76) there are notable differences in the costs for RSSAC ($4,000 for ICANN75 & ICANN77) and the Technical Liaison Group ($6,320 USD for ICANN75 & ICANN77 and $3,150 USD for ICANN76). Even allowing for the need for more lengthy international travel to certain locations, it is not clear why the costs should be so much higher in these particular groups compared to the others. The RrSG would like to see more information provided that justifies the additional expense.	Section 4.5.1
BC	Of specific importance to the BC, we require confirmation that current and continuing secretariat support includes responsibility for preparation and distribution of minutes for all BC meetings during FY23 and in future years.	Section 4.4.2
BC	On Activities, the BC recommends that ICANN Org makes best effort to ensure balanced talent hunt across the world that reflect diversity and the global nature of ICANN. Also, Administrative services: BC recommends that ICANN Org provides recommendations on the possibility of ICANN acquiring a permanent Office complex in the State of California.	Section 4.4.13
BC	On How Progress is Tracked, the BC recommends that ICANN Org includes an important step of Ethics Policy review with standards at the Transparency International or any other top ethics advancement organisations during the period under consideration.	section 4.3.5

BC	On How Progress is Tracked, the BC recommends that ICANN Org includes a published report on the number of in-country engagements by ICANN Org/Affiliates at Fora (e.g. Internet Governance Forum) where potentially impactful issues are discussed viz cybersecurity, data protection, privacy, cultural and geographic identifiers, emerging technologies, and proposed new systems of unique identifiers. It is our belief that such engagement would constitute an early warning mechanism for further action by the concerned.	Section 4.3.9
BC	On How Progress is Tracked, the BC recommends that ICANN Org includes a published report on the number of in-country engagements by ICANN Org/Affiliates at Fora (e.g. Internet Governance Forum) where potentially impactful issues are discussed viz cybersecurity, data protection, privacy, cultural and geographic identifiers, emerging technologies, and proposed new systems of unique identifiers. It is our belief that such engagement would constitute an early warning mechanism for further action by the concerned.	Section 4.3.10
BC	On How Progress is Tracked, the BC recommends that ICANN Org include the number of interactions led by the CEO (or his representative) at top-level government or Intergovernmental fora where potentially impactful issues are discussed, viz cybersecurity, data protection, privacy, cultural and geographic identifiers, emerging technologies, and proposed new systems of unique identifiers.	Section 4.4.7
BC	On page 130 of the FY23–27 Funding Assumptions and Projections, the Forecast Generation shows a reduction of contracted parties predicted. Is this due to consolidation? The BC would desire explanations on how this assumption was derived.	Section 4.5.4
BC	The BC is pleased to submit this comment on ICANN's Draft FY23–27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget. 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.	Section 4.1
BC	The BC notes that this year's draft FY23-27 OF&P an FY23 OP is again categorized into 15 Operating Initiatives and 33 Functional Activities across 5 service groups, reflective of the previous year's structure and the BC appreciates ICANN org's consistency which helps us in evaluating the Drafts.	Section 4.1
BC	We commend ICANN Org for improving the quality of the draft proposals year-on-year. However, considering that focus is on draft editions of the documents, we wish to recommend that the word draft should precede the title of both documents. Examples: ICANN Draft FY23-27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget could read Draft ICANN FY23-27 Operating and Financial Plan and FY23 Operating Plan and Budget. Also, ICANN FY23 Draft Budget could read Draft ICANN FY23 Budget. The word Draft is recommended to 2 come before the actual title as it is the key descriptive word. Key descriptive word is better to come first before the other title nomenclatures.	Section 4.1
BC	The BC acknowledges the value that the SFICR, as approved by the ICANN Board in FY21, brings to the Community's ability to pursue multi-year, community recommendations that cannot fit within the annual budget. SFICR is funded if	Section 4.5.7

	excess funds exist in the Operating Fund after an allocation to the Reserve Fund. Funding the SFICR has benefited from COVID-19 which has resulted in expense reduction and increased contributions to both it and the Reserve Fund. Yet it is not certain whether such excess funds will exist in future once normal operations resume.	
BC	SFICR is proposed in FY23 to be used to fund the SSAD ODP, subject to Board approval in March 2022. Meanwhile there are numerous other community recommendations still outstanding that would qualify for SFICR and should be evaluated for their impact on the community: from CCTRT, SSR2, and PPSAI. It is the BC's recommendation that a community driven mechanism be established to determine how priority is assigned to projects that benefit from such SFICR funding. To this point, we understand that the SSAD OPD and program development will possibly take 4-6 years before operational. While we are aware that costs for SSAD are proposed to be recouped from user fees over 5 years, this has not yet been finalized and SFICR could find itself drained between tackling this expensive undertaking and not being able to have annual excess funds to replenish it. Meanwhile, several other multi-year outstanding and prioritized community recommendations could have been addressed.	Section 4.5.7
BC	The BC notes that there is $0 allocated to meeting sponsorships for FY23. In a year when ICANN org expects to return to 3 face-to-face meetings, wouldn't this pose a risk to a seamless return to Face -to-Face meetings.	Section 4.5.4
BC	As a footnote to this chart, we are referred to the Glossary of the FY23 budget document which states "In regard to new hires, ICANN org budgets as a whole organization for headcount growth. The new hire figure is represented as a whole and not allocated out to the functional activities since it cannot be predicted at a department level." It is also noted in 4.4 Average Headcounts (from Highlights Document) that "Starting in FY22, ICANN org plans to hire new personnel in support of the Subsequent Procedures ODP.", of which 22 will be hired in FY23. We also note that on Pg. 132 of FY23–27 Financial Projections that stable headcount is proposed at 423 – yet Fy23 predicts headcount at 427 after 37 new hires. We seek a better understanding of this variance. The BC supports proper staffing to continue the important work of ICANN but note that 15 staff are unidentified in their roles. We request further details on the responsibilities of these 15 as well as the roles that the 22 staff will play within the SubPro ODP.	Section 4.5.5
BC	The BC notes that this continues to be identified at approximately 4% of budgeted expenses or $6.0M but not allocated to any specific activities to be used for expenses impossible to forecast. While this appears to have been adequate in past years, we are interested to know how this has been used in the past to ensure that this is appropriately funded going forward.	Section 4.5.6
BC	We are pleased to see that Production of BC Outreach materials, primarily Newsletters and Factsheets specific to events in the total amount of $15,000 with $4,500 allocated to the BC continues to be part of core ICANN org budget and are appreciative that other requests for funding from the BC are still eligible within this	Section 4.5.1

	program.	
BC	We note that expense for GDPR compliance continues to be undetermined and remains a risk as it was in FY22. With an additional year of attention to this matter, we would be interested to see some estimate financial risk to this item.	Section 4.5.6
BC	We note that the ICANN Board has approved 7-9 million for SubPro Operational Design Phase with 4 million reflected in FY22 6.3.1 Total ICANN FY22 Forecast. Can ICANN org confirm where the balance of this expenditure is captured within FY23 Draft?	Section 4.5.2

RrSG response to ICANN Draft FY23-27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget

https://www.icann.org/en/public-comment/proceeding/draft-fy23-27-operating-and-financial-plan-and-draft-fy23-operating-plan-and-budget-15-09-2021

The Registrar Stakeholder Group (RrSG) welcomes the opportunity to comment on the ICANN Draft FY23-27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget. Overall the RrSG is pleased to once again see more information, detail and explanations than used to be provided.

The RrSG notes that an allocation for new gTLDs has now been included in the FY23 budget. Its prior absence is something the RrSG previously commented on and so we appreciate that ICANN have taken on that feedback.

There is, however, one point that the RrSG would like some clarification on. The FY23 budget (p19) outlines constituent travel by SOAC and illustrates that travel costs, if divided by the number of people the amount is allocated to, differ between the groups. Although most groups have similar per-individual costs (around $2,900 USD for ICANN75 & ICANN77 and $2,400 USD for ICANN76) there are notable differences in the costs for RSSAC ($4,000 for ICANN75 & ICANN77) and the Technical Liaison Group ($6,320 USD for ICANN75 & ICANN77 and $3,150 USD for ICANN76). Even allowing for the need for more lengthy international travel to certain locations, it is not clear why the costs should be so much higher in these particular groups compared to the others. The RrSG would like to see more information provided that justifies the additional expense.

COMMENT ON DRAFT ICANN FY23–27 OPERATING AND FINANCIAL PLAN

AND DRAFT FY23 OPERATING PLAN AND BUDGET

07- Feb-2022

Background

This document is the response of the ICANN Business Constituency (BC), from the perspective of business users and registrants, as defined in our Charter:

> The mission of the Business Constituency is to ensure that ICANN policy positions are consistent with the development of an Internet that:
>
> 1. Promotes end-user confidence because it is a safe place to conduct business;
>
> 2. Is competitive in the supply of registry and registrar and related services; and
>
> 3. Is technically stable, secure and reliable.

BC comment on DRAFT ICANN's Draft FY23–27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget

The BC is pleased to submit this comment on ICANN's Draft FY23–27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget. 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.

The BC notes that this year's draft FY23-27 OF&P an FY23 OP is again categorized into 15 Operating Initiatives and 33 Functional Activities across 5 service groups, reflective of the previous year's structure and the BC appreciates ICANN org's consistency which helps us in evaluating the Drafts.

General Comments:

We commend ICANN Org for improving the quality of the draft proposals year-on-year. However, considering that focus is on draft editions of the documents, we wish to recommend that the word draft should precede the title of both documents.

Examples: ICANN Draft FY23-27 Operating and Financial Plan and Draft FY23 Operating Plan and Budget could read Draft ICANN FY23-27 Operating and Financial Plan and FY23 Operating Plan and Budget. Also, ICANN FY23 Draft Budget could read Draft ICANN FY23 Budget. The word Draft is recommended to

come before the actual title as it is the key descriptive word. Key descriptive word is better to come first before the other title nomenclatures.

Section A: DRAFT ICANN FY23–27 Operating and Financial Plan.

A. Develop Internal and External Ethics Policies
   On How Progress is Tracked, the BC recommends that ICANN Org includes an important step of Ethics Policy review with standards at the Transparency International or any other top ethics advancement organisations during the period under consideration.

B: Improve Governmental and Intergovernmental Organization (IGO) Engagement and Participation in ICANN Through Targeted Engagement

On How Progress is Tracked, the BC recommends that ICANN Org includes a published report on the number of in-country engagements by ICANN Org/Affiliates at Fora (e.g. Internet Governance Forum) where potentially impactful issues are discussed viz cybersecurity, data protection, privacy, cultural and geographic identifiers, emerging technologies, and proposed new systems of unique identifiers. It is our belief that such engagement would constitute an early warning mechanism for further action by the concerned.

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

On How Progress is Tracked, the BC recommends that ICANN Org includes a published report on the number of in-country engagements by ICANN Org/Affiliates at Fora (e.g. Internet Governance Forum) where potentially impactful issues are discussed viz cybersecurity, data protection, privacy, cultural and geographic identifiers, emerging technologies, and proposed new systems of unique identifiers. It is our belief that such engagement would constitute an early warning mechanism for further action by the concerned.

D. Governmental and Intergovernmental Organization Engagement

On How Progress is Tracked, the BC recommends that ICANN Org include the number of interactions led by the CEO (or his representative) at top-level government or Intergovernmental fora where potentially impactful issues are discussed, viz cybersecurity, data protection, privacy, cultural and geographic identifiers, emerging technologies, and proposed new systems of unique identifiers.

E. Global Human Resources and Administrative Services

On Activities, the BC recommends that ICANN Org makes best effort to ensure balanced talent hunt across the world that reflect diversity and the global nature of ICANN.

Also, Administrative services: BC recommends that ICANN Org provides recommendations on the possibility of ICANN acquiring a permanent Office complex in the State of California.

Supplemental Fund for Implementation of Community Recommendations (SFICR)

The BC acknowledges the value that the SFICR, as approved by the ICANN Board in FY21, brings to the Community's ability to pursue multi-year, community recommendations that cannot fit within the annual budget. SFICR is funded if excess funds exist in the Operating Fund after an allocation to the Reserve Fund.

Funding the SFICR has benefited from COVID-19 which has resulted in expense reduction and increased contributions to both it and the Reserve Fund. Yet it is not certain whether such excess funds will exist in future once normal operations resume.

SFICR is proposed in FY23 to be used to fund the SSAD ODP, subject to Board approval in March 2022. Meanwhile there are numerous other community recommendations still outstanding that would qualify for SFICR and should be evaluated for their impact on the community: from CCTRT, SSR2, and PPSAI. It is the BC's recommendation that a community driven mechanism be established to determine how priority is assigned to projects that benefit from such SFICR funding.

To this point, we understand that the SSAD OPD and program development will possibly take 4-6 years before operational. While we are aware that costs for SSAD are proposed to be recouped from user fees over 5 years, this has not yet been finalized and SFICR could find itself drained between tackling this expensive undertaking and not being able to have annual excess funds to replenish it. Meanwhile, several other multi-year outstanding and prioritized community recommendations could have been addressed.

FY23–27 Funding Assumptions and Projections

Note: On page 130 of the FY23–27 Funding Assumptions and Projections, the Forecast Generation shows a reduction of contracted parties predicted. Is this due to consolidation? The BC would desire explanations on how this assumption was derived.

5-Year Projections	FY23	FY24	FY25	FY26	FY27
ICANN Ops Funding *(In Millions USD)*					
Base	$152.0	$155.3	$158.7	$160.1	$161.7
Low	$132.9	$127.1	$124.5	$120.7	$117.3
High	$158.4	$167.5	$177.0	$185.2	$194.1
Transaction Volume *(In Millions)*					
Base	227.1	235.4	243.7	252.0	260.5
Low	187.5	178.1	174.5	171.8	169.8
High	239.4	259.4	280.0	302.0	325.6
Contracted Parties					
Base	3,592	3,580	3,567	3,553	3,545
Low	3,346	3,175	3,075	3,020	2,994
High	3,625	3,675	3,730	3,787	3,845

Section 2: Draft FY23 Operating Plan and Budget.

4.2 Funding

The BC notes that there is $0 allocated to meeting sponsorships for FY23. In a year when ICANN org expects to return to 3 face-to-face meetings, wouldn't this pose a risk to a seamless return to Face -to-Face meetings.

In Millions, US Dollars	FY23 Draft Budget	FY22 Forecast	Over / (Under) $	%	Other FY23 Scenarios High	Low
Transactions						
Legacy transaction fees	$ 93.1	$ 90.1	$ 3.0	3%	$ 98.0	$ 77.8
New gTLD transaction fees	9.9	9.5	0.4	4%	11.1	7.7
Sub-total	**103.0**	**99.6**	**3.4**	**3%**	**109.1**	**85.5**
Volume: legacy transactions (millions)	201.2	193.6	7.6	4%	210.6	167.3
Volume: New gTLD transactions (millions)	25.8	24.8	1.0	4%	28.8	20.1
Sub-total	**227.1**	**218.4**	**8.7**	**4%**	**239.4**	**187.5**
Volume: New gTLD billable transactions (millions)	21.1	20.3	0.8	4%	23.7	16.5
New gTLD Billable rate - average	81.8%	81.8%	(0%)		82.4%	81.8%
Registry Fixed Fees	**28.7**	**28.9**	**(0.3)**	**(1%)**	**28.7**	**27.7**
Count of total Registries/TLDs - at end of year	1,145	1,149	(4)	(0%)	1,146	1,102
Registrars Accreditation						
Application fees	0.1	0.2	(0.1)	(59%)	0.2	-
Accreditation fees - annual	9.7	9.7	0.0	0%	9.9	9.2
Per-registrar variable fees	3.4	3.4	-	-	3.4	3.4
Sub-total	**13.3**	**13.4**	**(0.1)**	**(1%)**	**13.5**	**12.6**
Count of total Registrars - at end of year	2,447	2,419	28	1%	2,479	2,244
Contributions						
SSR Contribution	4.0	4.0	-	-	4.0	4.0
ccTLD	2.3	2.3	-	-	2.3	2.3
RIR	0.8	0.8	-	-	0.8	0.8
Meeting Sponsorships/Other	-	-	-	-	-	-
Sub-total	**7.1**	**7.1**	**-**	**-**	**7.1**	**7.1**
ICANN Ops Funding	**$ 152.0**	**$ 149.1**	**$ 3.0**	**2%**	**$ 158.4**	**$ 132.9**

4.4 Expenses by Service Group and Functional Activity

4.4 Expenses by Service Group and Functional Activity

The following table compares the ending headcount (as FTE or Full-Time Equivalent) and expenses by ICANN Operations service group in the FY23 Draft Budget with the headcount and expenses in the FY22 Forecast. There are five service groups under which ICANN org's functional activities are included. To view the expenses by functional activity, please download the Excel file here.

In millions, USD Service Group / Functional Activity	FTE [1]	FY23 Draft Budget Expenses Pers.	Non Pers.[2]	Total	FTE [1]	FY22 Forecast Expenses Pers.	Non Pers.[2]	Total	FTE [1]	Increase/(Decrease) Expenses Pers.	Non Pers.[2]	Total
Technical and DNS Security	73	$14.9	$10.4	$25.3	73	$14.2	$5.9	$20.1	0	$0.6	$4.6	$5.2
Policy Development and Implementation Support	73	$13.9	$6.9	$20.8	71	$12.6	$4.4	$16.9	2	$1.4	$2.5	$3.9
Community Engagement & Services	92	$18.7	$12.5	$31.2	91	$17.4	$8.2	$25.6	1	$1.4	$4.2	$5.6
ICANN Org Governance	34	$11.2	$7.7	$18.9	34	$10.8	$6.7	$17.5	0	$0.4	$1.0	$1.4
ICANN Org Shared Services	118	$24.6	$24.0	$48.6	118	$22.2	$21.5	$43.8	0	$2.3	$2.5	$4.8
Subtotal [3]	**390**	**$83.3**	**$61.5**	**$144.8**	**387**	**$77.2**	**$46.7**	**$123.9**	**3**	**$6.1**	**$14.8**	**$20.9**
Budgeted New Hires	37	$5.7	$0.0	$5.7	23	$2.6	$0.0	$2.6	14	$3.1	$0.0	$3.1
Contingency	0	$0.0	$6.0	$6.0	0	$0.0	$5.2	$5.2	0	$0.0	$0.8	$0.8
Organizational Adjustments and Allocations	0	($2.4)	($2.0)	($4.5)	0	($1.4)	($1.0)	($2.4)	0	($1.1)	($1.0)	($2.1)
Total	**427**	**$86.5**	**$65.5**	**$152.0**	**410**	**$78.4**	**$50.9**	**$129.4**	**17**	**$8.1**	**$14.6**	**$22.7**

[1] Full-Time Equivalents at the end of the fiscal year
[2] Non Personnel Expenses include Travel & Meetings, Professional Services, Administration and Capital
[3] Subtotal of allocated Functional Activities. Items below the Subtotal are not allocated and are defined in the Glossary of the FY23 Draft Budget document

The BC notes that 37 new hires are proposed for addition in FY23.

As a footnote to this chart, we are referred to the Glossary of the FY23 budget document which states "In regard to new hires, ICANN org budgets as a whole organization for headcount growth. The new hire figure is represented as a whole and not allocated out to the functional activities since it cannot be predicted at a department level."

It is also noted in 4.4 Average Headcounts (from Highlights Document) that "Starting in FY22, ICANN org plans to hire new personnel in support of the Subsequent Procedures ODP.", of which 22 will be hired in FY23.

We also note that on Pg. 132 of FY23–27 Financial Projections that stable headcount is proposed at 423 – yet Fy23 predicts headcount at 427 after 37 new hires. We seek a better understanding of this variance.

The BC supports proper staffing to continue the important work of ICANN but note that 15 staff are unidentified in their roles. We request further details on the responsibilities of these 15 as well as the roles that the 22 staff will play within the SubPro ODP.

Of specific importance to the BC, we require confirmation that current and continuing secretariat support includes responsibility for preparation and distribution of minutes for all BC meetings during FY23 and in future years.

4.7 Contingency

The BC notes that this continues to be identified at approximately 4% of budgeted expenses or $6.0M but not allocated to any specific activities to be used for expenses impossible to forecast. While this appears to have been adequate in past years, we are interested to know how this has been used in past to ensure that this is appropriately funded going forward.

4.5.2 Additional Budget Requests (ABRs)

We are pleased to see that Production of BC Outreach materials, primarily Newsletters and Factsheets specific to events in the total amount of $15,000 with $4,500 allocated to the BC continues to be part of core ICANN org budget and are appreciative that other requests for funding from the BC are still eligible within this program.

4.6 Risks and Opportunities

We note that expense for GDPR compliance continues to be undetermined and remains a risk as it was in FY22. With an additional year of attention to this matter, we would be interested to see some estimate financial risk to this item.

6.5 Operational Design Phase for New Generic Top-Level Domains

We note that the ICANN Board has approved 7-9 million for SubPro Operational Design Phase with 4 million reflected in FY22 6.3.1 Total ICANN FY22 Forecast.

New gTLD Program
- Expenses are $8 million.
  - $4 million is related to the 2012 Round including direct expenses and allocations from ICANN Operations.
  - $4 million is related to the Subsequent Procedures ODP (expected to begin in early calendar 2022) including direct expenses and allocations from ICANN Operations.

Can ICANN org confirm where the balance of this expenditure is captured within FY23 Draft?

This comment was drafted by Tim Smith, Lawrence Olawale-Roberts, and Jimson Olufuye.

It was approved in accord with our charter.