
Public Comment Summary Report

IANA 2030 Strategy: Draft PTI Strategic Plan Covering 2025–2030

Open for Submissions Date:

Tuesday, 26 November 2024

Closed for Submissions Date:

Wednesday, 29 January 2025

Summary Report Due Date:

Monday, 03 March 2025

Category: Operations

Requester: ICANN org

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

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Outcome:

The Draft IANA 2030 Strategy Public Comment Proceeding received a total of seven submissions, five from organizations and two from individuals. These contributions provide valuable insights from our community. Commenters expressed general support for the Draft Strategic Plan, with some concerns expressed about Public Technical Identifiers' (PTI) outreach strategies and being appropriately funded to meet the strategic goals.

This report presents the staff summary of the comments and observations related to the topics raised by the submitters. While certain comments were primarily operational in nature and will be addressed in the future PTI Operating Plans and Budgets, others suggest revisions to the Strategic Plan. For those comments that are not expected to result in changes to the Draft Strategic Plan, the rationale for such decisions is outlined in this report.

ICANN extends its appreciation for the time, effort, and participation of all involved in this proceeding and expresses its gratitude to those that provided feedback.

Section 1: What We Received Input On

The PTI Bylaws mandate the development of a five-year Strategic Plan that outlines the organization's priorities as the organization responsible for delivering the IANA functions. The purpose of this proceeding was to seek community feedback on the draft IANA 2030 Strategy covering 2025–2030.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
ccNSO SOPC	Andreas Musielak	SOPC
Customer Standing Committee	Frederico Neves	CSC
GNSO Business Constituency	Arinola Akinyemi	BC
GNSO Registries Stakeholder Group		RySG
ICANN At-Large Advisory Committee		ALAC

Individuals:

Name	Affiliation (if provided)	Initials
Felix Opilli	AFRALO	FO
Milton Mueller	Internet Governance Project	MM

All respondents are referenced by initials below.

Section 3: Summary of Submissions

The seven submissions consist of 57 specific comments, which were categorized into six themes: (1) plan structure; (2) vision; (3) risks; (4) innovation focus area; (5) operational excellence focus area; and (6) community engagement focus area. Section 4 includes ICANN and PTI's response to each theme.

Total Number of Comments by Submitter by Theme							Total by Theme
	ALAC	BC	SOPC	CSC	RySG	Others	
4.1. Plan Structure	2	5	2	1	3	3	16
4.2. Vision	-	-	2	-	-	-	2
4.3. Risks	1	2	-	-	-	1	4
Focus Areas:							

Total Number of Comments by Submitter by Theme							Total by Theme
	ALAC	BC	SOPC	CSC	RySG	Others	
4.4 Innovation	5	-	-	1	1	2	9
4.5 Operational Excellence	4	-	1	1	2	2	10
4.6 Community Engagement	5	4	2	2	1	2	16
Total by Submitter	17	11	7	5	7	10	57

Section 4: Analysis of Submissions

4.1 Plan Structure

The IANA 2030 Strategy received support from respondents that indicated the plan provides a valuable framework to guide IANA's future work. There was considerable support for the focus areas and objectives outlined in the plan. The Country Code Names Supporting Organization (ccNSO) Strategic and Operational Standing Committee (SOPC) sought clarification as to whether the focus areas implied any prioritization. IANA confirms the focus areas are not presented in any specific order of priority, and to provide this clarity the team will consider revising the draft plan to explicitly state this information.

The BC noted that alignment with the ICANN Strategic Plan was needed to ensure consistency and avoid duplication of effort within the ICANN ecosystem. PTI agrees and highlights that alignment was done during the development of the plan as described in the Supplemental Information section of the [Draft IANA 2030 Strategy](#).

MM mentioned a possible historical inaccuracy in the innovation section pertaining to when IANA began. PTI agrees the language is imprecise, but it was referring to the origins of the functions that date back to Jon Postel's early role coordinating identifiers in the 1970s, growing over time and formalizing into what is now called IANA. The team will consider revisions to the language.

4.2 Vision

The SOPC provided support of the proposed vision statement, specifically as it highlights the need to innovate. Other respondents also commented and agreed that

maintaining IANA's central role in coordinating the Internet's unique identifiers was the most critical, with some emphasizing the importance of prioritizing operational excellence efforts over outreach to new stakeholders. PTI appreciates this input and assures the community that the team will continue to prioritize service delivery to its core customers.

4.3 Risks

While the RySG appreciated the clarity of the statement of risks contained in the Draft IANA 2030 Strategy, all respondents showed concern about PTI's resource constraints. The BC indicated that the strategy lacked details on how PTI planned to secure the necessary budget to accomplish its objectives. The group suggested that PTI advocate for increased budget allocations within ICANN, exploring alternative funding sources, and demonstrating the value of these investments. The SOPC noted that reliable performance of the IANA functions should be ICANN's highest priority and therefore PTI should be adequately resourced.

PTI notes that ICANN understands the critical nature of the IANA functions and is committed to providing the funding to PTI for the IANA functions. This is shown in [ICANN's Draft Five-Year Strategic Plan](#) covering the same period, specifically through Strategic Goal 3.3, "Deliver and Enhance the IANA Functions to Meet Evolving Community Needs," and associated Strategies 3.3.1, "Continue to reliably deliver the IANA functions," and 3.3.2, "Ensure that the IANA functions are properly resourced."

The BC and FO commented on staff and community resistance to change, particularly regarding the adoption of new technologies and processes. Both commenters suggested strategies for overcoming this resistance, such as effective communication, training, and change-management initiatives. PTI notes that many of the suggested mitigation approaches are either already existing practices, or are aligned with PTI's operating priorities for the next five years.

Focus Areas

Respondents noted that the three focus areas outlined in the Draft IANA 2030 Strategy were well-aligned with ICANN's overarching strategy. ALAC emphasized how each area supports the achievement of the [United Nations \(U.N.\) Sustainable Development Goals](#), specifically those related to Industry, Innovation, and Infrastructure; Quality Education; and Peace, Justice, and Strong Institutions. ALAC proposed broadening the scope to further support these goals. PTI appreciates ALAC for drawing the connection between the two plans, but given IANA's limited mandate, it would not be appropriate or feasible to expand the scope of its strategy to align with the U.N.'s extensive range of goals.

Many respondents provided valuable feedback regarding the absence of specific implementation plans for each focus area's objectives, and offered thoughtful suggestions on how PTI could achieve each strategic goal and/or mitigate risks. PTI

appreciates these contributions but wishes to clarify that the IANA 2030 Strategy is intended to outline the strategic priorities for PTI over the next five years. The detailed approaches and implementation plans will be articulated through the annual operational planning and budgeting process.

4. 4 Innovation Focus Area

All respondents offered support and some suggestions with respect to innovation. The CSC supported PTI's plan to evolve its systems to improve customer experience and therefore increase customer satisfaction, reduce operational and administrative costs, and enhance security. The RySG appreciated IANA taking a proactive approach toward emerging technologies given the possible risks related to Internet fragmentation and interoperability. ALAC also supported IANA's proactive approach and commented that this could be implemented with minimal pressure on existing staff and resources by partnering with similar activities undertaken in other parts of ICANN. IANA confirms that while PTI works in close collaboration with experts from both the ICANN organization and the broader community (e.g., IETF experts), the highly specialized nature of IANA's operations presents significant challenges in talent recruitment and development. The expertise required for IANA's work is rare, and the associated learning curve is steep. This results in considerable strain on existing staff, requiring a balance between their day-to-day responsibilities with their roles as subject-matter experts on various system enhancement projects. As a result, this dynamic impedes PTI's overall agility.

The SOPC proposed relocating two key performance indicators, "Meet or exceed service-level agreements" and "Meet or exceed internal system performance metrics," to the operational excellence and community engagement focus areas, citing their relevance to customer satisfaction and experience. PTI acknowledges that these key performance indicators are directly linked to the strategic goals rather than the focus areas themselves. The two performance indicators that the SOPC referenced are aligned with Goal 1.2: "Implement advanced technology-driven solutions that redefine our operations, expand service capabilities, and enable greater agility in meeting evolving customer needs."

PTI regularly conducts customer surveys to evaluate perceptions of its service delivery. Increased satisfaction and positive feedback regarding the user experience are critical indicators that system and process enhancements are effectively meeting the evolving needs of IANA's customers. This is the rationale for the inclusion of these key performance indicators under Goal 1.2.

Tactical suggestions were provided by respondents, including FO, who proposed exploring blockchain for distributed identifier systems, establishing a risk-mitigation framework, and leveraging peer success stories. ALAC recommended partnerships with developers of alternative name spaces to ensure alignment with DNS security and Universal Acceptance principles.

While PTI welcomes these recommendations and acknowledges their alignment with PTI's priorities for the next five years, they are considered tactical in nature and therefore are more appropriately addressed through the annual operational planning and budgeting, where the team details the implementation approach for the strategic goals.

4.5 Operational Excellence Focus Area

All respondents were supportive of the operational excellence focus area, highlighting that stable operations and outstanding performance are critical, and that it is important to seek opportunities for improvement. The SOPC stated that this should be PTI's main priority, with the other two focus areas being relevant only to the extent that they serve stable operations. The BC welcomed PTI's priority on streamlining processes and improving customer experience, and the CSC specifically mentioned support for more automation and efficiency improvements.

ALAC and FO provided comments that the Strategic Plan lacks clear operational key performance indicators (KPIs) for measuring and demonstrating service improvements. ALAC and FO suggested metrics like processing times, system availability, and customer satisfaction, with regular performance updates and periodic performance reviews. Strategic Goal 2.1 of the IANA 2030 Strategy is meant to emphasize the need to continuously monitor and evolve these practices. On an operational level, PTI would like to highlight iana.org/performance, where the community can find many kinds of reporting including extensive metrics, and note there are established community bodies, such as the [Customer Standing Committee](#), that regularly monitor and report on PTI's performance.

The RySG and the CSC noted the importance of investing in PTI staff to avoid failure in this critical business process. ALAC's comments were also supportive of this and specifically suggested training staff in emerging technologies. FO suggested mandatory staff certification in relevant fields. MM commented that PTI should have priority in terms of budget. PTI notes the support for this focus area and the community's recognition of the importance of the IANA functions. PTI makes allocation in its budget each year for staff training and development, and also reiterates that ICANN is committed to providing the funding for PTI, as stated in Section 4.3.

4.6 Community Engagement Focus Area

There was support for community engagement, particularly from the RySG, which appreciated that PTI acknowledges that the work of community engagement is never done. FO, ALAC, and the BC supported PTI's plan to build new alliances, particularly in underserved regions. The SOPC agreed to the extent that PTI focuses on increasing awareness among the regional country code top-level domain (ccTLD) communities. The CSC offered a similar perspective but in the context of empowering the top-level domain manager community and prioritizing core functions rather than engagement.

Some respondents suggested changes to KPIs. The BC indicated that the metrics in this focus area are not as specific as those for operational excellence and innovation. PTI will consider revisions to address this observation.

ALAC suggested more visibility and opportunities to engage with the PTI Board. PTI notes that most of its Board members are typically present at ICANN meetings and other community events, and regularly participate in proceedings. The PTI Board regularly meets with key community groups such as the CSC, but its participation reflects its substantially different mandate to that of the ICANN Board. Notably, the PTI Board has no role in policy development as all policies that govern the IANA functions are developed by other entities, like ICANN and the Internet Engineering Task Force (IETF). As PTI's remit is only the performance of the IANA functions at the direction of ICANN, the PTI Board's concern is the proper operation of the company to do so in accordance with its commitments.

ALAC recommended that PTI conduct dedicated sessions with research institutions and academia working on alternative name spaces, and educate the community about their risks and benefits. The group suggested that IANA take the lead in protecting its stakeholders' capacity building and the broader Internet ecosystem.

The CSC and MM outlined possible concerns surrounding the notion of outreach to nontraditional stakeholders. Both suggested that PTI continue to prioritize its core functions rather than seeking to engage new stakeholders as if it were a policy entity because this can lead to more confusion about IANA's role. MM and ALAC asked that PTI clarify some of the language in the draft, particularly the term "nontraditional stakeholders," and the need for IANA to "expand its influence, as relationships are often confined to a familiar group of stakeholders, with few new connections being formed". MM also commented that PTI could leverage its status as a trusted global coordinator to host new kinds of online registries, and that can happen through outreach to new stakeholders.

Regarding the concerns expressed by the CSC and MM, PTI understands the apprehension regarding the language around expanding IANA's influence and engaging with nontraditional stakeholders. The goal is not to interfere with policymaking or to position PTI as a political entity. PTI's primary goal is simply to ensure that IANA's current role – performing critical Internet identifier functions that require consistent allocation at a global level – is clearly understood by everyone that relies on it. This includes nontraditional stakeholders, which refers to parties that are not actively involved in the workings of ICANN and our partners and thus are not as familiar with the organization. PTI has identified stakeholders that rely on the IANA functions, whose work is still deeply connected to the foundational systems that IANA manages, but that lack perspective on how we work and how to best utilize the functions we already perform. In other words, PTI aims to ensure all relevant parties understand the importance and availability of IANA's role in maintaining the integrity and smooth operation of the global internet. This awareness will help ensure IANA is properly used by the community for the purposes it is designed for.

In the most recent engagements with community members, particularly from underserved regions, it became clear that many still lack a full understanding of IANA's role and importance. This gap in awareness often leads to requests for IANA to undertake tasks that are beyond its scope. For example, the team is sometimes asked to make decisions on ccTLD transfers that fall outside the boundaries of IANA's mandate. This underscores the need for better education on IANA's function as an operational implementer of policies rather than a policymaker.

PTI appreciates the suggestion that openness to new opportunities – such as supporting emerging online activities like privacy sandbox, PKI, and blockchain – could be a way to evolve IANA's role as a trusted global coordinator. PTI agrees that creativity and forward-looking thinking are important, but also understands the risks involved in expanding beyond IANA's core functions. The focus remains firmly on fulfilling IANA's current mandate and ensuring the stability and coordination of the Internet's essential systems. PTI will consider revisions to the language in the Draft IANA 2030 Strategy to clarify the terms “nontraditional stakeholders” and “underrepresented groups” to better demonstrate this intent, and that the goal is to perform within our existing mandate in an improved manner.

Section 5: Next Steps

ICANN and PTI appreciate all community feedback provided to this proceeding, and all comments have been reviewed in preparation of this report. This feedback will be provided to the PTI Board for its consideration, including the revisions identified above.

The adoption of the final strategy is anticipated by the PTI Board in April 2025.