

Public Comment Summary Report

Draft ICANN FY25 Plans

Open for Submissions Date:
Tuesday, 12 December 2023

Closed for Submissions Date:
Monday, 12 February 2024

Summary Report Due Date:
Tuesday, 02 April 2024

Category: Operations

Requester: ICANN org

ICANN org Contact(s):
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Open Proceeding Link:
<https://www.icann.org/en/public-comment/proceeding/draft-icann-fy25-plans-12-12-2023>

Outcome:
ICANN received 160 comments from six community groups and five individuals about the: (i) Draft ICANN FY25 Budget; (ii) Draft ICANN FY25–29 Operating and Financial Plan & Draft ICANN FY25 Operating Plan; and (iii) Draft IANA FY25 Operating Plan and Budget. One (1) individual’s submission was flagged as spam and was removed. The latter will not be further considered.

The comments were reviewed and have been categorized into five themes: document structure, operating plan, operating initiatives, functional activities, and financial management. The Public Comment summary report includes ICANN’s response to the submission.

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Section 1: Plans Posted for Public Comment

ICANN org posted the following documents for Public Comment: (i) the Draft ICANN FY25–29 Operating and Financial Plan & the Draft ICANN FY25 Operating Plan; (ii) the Draft ICANN FY25 Budget; and (iii) the Draft IANA FY25 Operating Plan and Budget.

The Draft ICANN FY25–29 Operating and Financial Plan & Draft ICANN FY25 Operating Plan, along with the Draft ICANN FY25 Budget, define how ICANN org will implement the final year of the [Strategic Plan for Fiscal Years 2021–2025](#), which was [adopted](#) by the ICANN Board in June 2019.

Specifically, these plans detail the feasibility, cost and timing of activities and milestones identified to achieve the Strategic Plan’s objectives and goals. They also provide an overarching view of the activities ICANN org is undertaking or will undertake, in support of the Strategic Plan, to carry out its mission in the public interest.

The IANA Operating Plan and Budget includes the work conducted by the Public Technical Identifiers (PTI) pursuant to a contract it has with ICANN (as reflected in the PTI Operating Plan and Budget), plus the plans for and costs incurred directly by ICANN for overseeing and enabling performance of the IANA functions. Once the PTI Operating Plan and Budget is adopted by the PTI Board, it is then incorporated into the broader IANA Operating Plan and

Budget, which is considered by the ICANN Board to support the operations of the IANA functions.

Section 2: Submissions

Organizations and Groups:

Name	Initials
At-Large Advisory Committee	ALAC
Business Constituency	BC
Governmental Advisory Committee	GAC
gTLD Registries Stakeholder Group	RySG
ccNSO Strategic and Operational Planning Committee	ccNSO SOPC

Individuals:

Name	Initials
Elvira Napwora	
Muhammad Shabbir	
Ruben Diaz Silva	
Kossi Amessinou	

Section 2a: Late Submissions

ICANN org accepted late submissions, which have been included in the total comment count and appended to this summary report for visibility. However, submissions received after the Public Comment deadline are not directly addressed. Where applicable, ICANN org will reference responses for similar comments received before the deadline.

Organizations and Groups:

Name	Initials
Registrar Stakeholder Group	RrSG

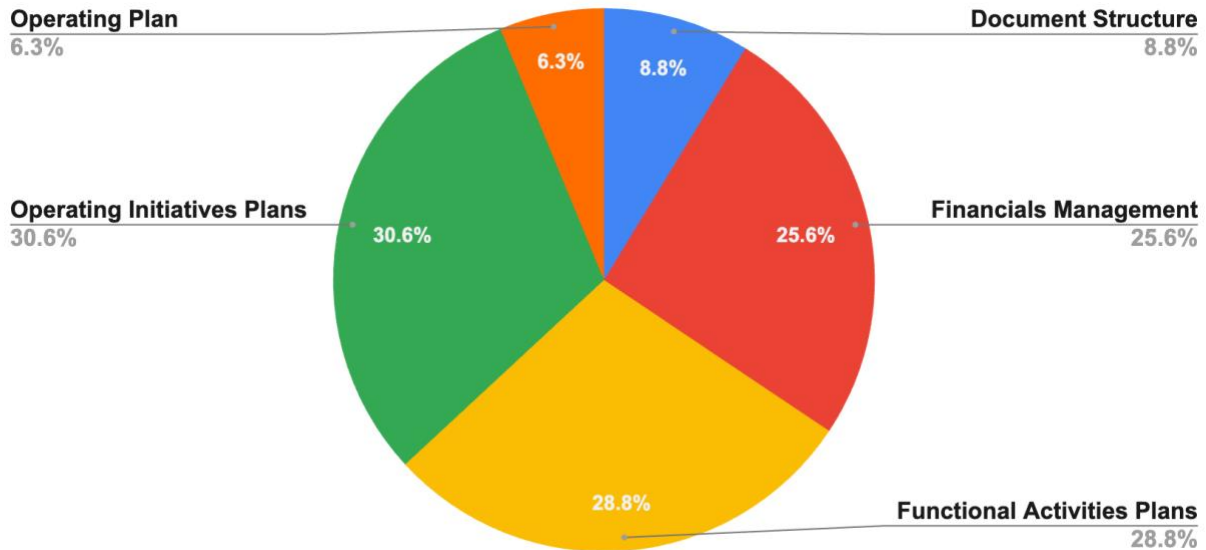
Individuals:

Name	Initials
Judith Hellerstein & Remmy Nweke	

Section 3: Summary of Submissions

ICANN org received 160 comments from six community groups and five individuals about the: (i) Draft ICANN FY25 Budget; (ii) Draft ICANN FY25–29 Operating and Financial Plan & Draft ICANN FY25 Operating Plan; and (iii) the Draft IANA FY25 Operating Plan and Budget. This Public Comment summary report (Report) addresses all three of these plans, and the comments received are categorized into five themes: (1) document structure; (2) operating plan; (3) operating initiatives; (4) functional activities; and (5) financial management. This Report

includes ICANN org’s response to the submissions. All received comments will be taken into consideration, and where appropriate and feasible, incorporated into a Revised Draft ICANN FY25–29 Operating and Financial Plan, a Revised Draft ICANN FY25 Operating Plan, a Revised Draft ICANN FY25 Budget, and a Revised Draft IANA FY25 Operating Plan and Budget prior to Board consideration. All comments received by the submission date are also available on the [Public Comment page](#).



Section 4: Analysis of Submissions

4.1 Document Structure

Overall, fourteen (14) comments were received regarding the general structure of the plans, particularly about the length and details of the documents, as well as some suggestions for future enhancement.

ICANN org appreciates the support received regarding the improvements in this year’s draft plans. The BC commended the use of deltas to highlight new activities and changes from the previous year’s plans. The GAC observed the ongoing improvements to the format and detail of the extensive materials made through the years. The GAC also noted the coordination to tie in the five-year and one-year operating plans. ICANN org continually seeks to improve the quality and content of the plan documents and the planning process. ICANN org acknowledges the importance of coordinating resources effectively to ensure the strategic and operating initiatives are completed.

The RySG raised concerns about the volume of information in the documents and the complexity of ICANN’s budget and financial reporting. The RySG invited ICANN to simplify its financial reporting so that it is easier to assess where ICANN is focusing its resources. ICANN org acknowledges that the Draft ICANN FY25–FY29 Operating and Financial Plan & Draft ICANN FY25 Operating Plan document is long. ICANN org is committed to continually improve the plan documents and welcomes engagement with the community on the plans’ structure and

proposed changes, including evaluating how ICANN org documents Operating Initiatives and Functional Activities.

In regard to the complexity of ICANN's budget and financial reporting, ICANN org continues to identify ways to simplify reporting while still providing detailed financial information in the operating plan and budget documents to ensure transparency. It was noted that this was a concern raised by the RySG and the ccNSO SOPC in previous years. ICANN developed Activity Based Reporting to accomplish this very goal: simplify financial reporting and explain costs in a way that clearly resonates with the org, Board, and community. By explaining financials in a way that more directly relates to ICANN's core work and mission, ICANN is further enhancing transparency and accountability.

ICANN acknowledges the concerns raised by the ALAC regarding visual accessibility. The deficiencies in alternative text and appropriate color contrast were noted and will be considered if feasible for the to be proposed for adoption plan documents and future plan documents. ICANN also received a comment from Muhammad Shabbir noting the lack of initiatives in the five-year plan to make ICANN content, meetings, and/or processes accessible for people with disabilities. It was requested that the plans should include specific strategies for making ICANN's platforms, meetings, and information accessible to individuals with various disabilities. ICANN appreciates these suggestions for future enhancements to ensure the plan documents are accessible for all and intends to evaluate the accessibility based on established best practices. It is part of ICANN's culture and expected standards of behavior to treat all members of the ICANN community equally, irrespective of, among other things, nationality, gender, racial or ethnic origin, religion or beliefs, disability, age, or sexual orientation. ICANN org will continue to look for opportunities to make ICANN accessible for all.

A comment was also submitted regarding updated language needed on page 24 and page 25 of the Draft FY25 ICANN Budget. ICANN is modifying the event labels for "GDD Summit" and "Constituent Travel" to "Contracted Party House (CPH) Summit" on page 24. On page 25, "ICANN 80 - TBD" will be updated to "ICANN 80 - Kigali".

4.2 Operating Plan

ICANN received ten (10) comments about the Highlights and the Draft ICANN FY25 - 29 Operating Plan, including comments about planning assumptions, prioritization, overarching progress measurement, and reporting.

4.2.1 Planning Assumptions

The ccNSO SOPC and BC submitted comments providing general support for the planning assumptions identified in regard to risks and progress tracking. ICANN appreciates the insight and support provided through the review of the draft plans.

4.2.3 Prioritization

The BC notes that throughout both the FY25–29 and FY25 plans there are numerous references to the blog "ICANN Interim President and CEO Shares Goals for Fiscal Year 2024". The BC finds it valuable that this is being used to guide priorities and work in the Operational Initiatives and Functional Activities throughout the: (i) Draft ICANN FY25 Budget; and (ii) Draft ICANN FY25–29 Operating and Financial Plan & Draft ICANN FY25 Operating Plan. ICANN appreciates the BC's support of the integration of the multi-year President and CEO goals into the FY25 operating plans.

4.2.4 Progress Measurement and Reporting

ICANN thanks the BC for its comment regarding the measurable progress tracking across all areas in the FY25 plans. Similarly, ICANN also appreciates the ccNSO SOPC's comment and suggestion regarding the progress measurement of Operating Initiatives and Functional Activities. ICANN notes the reference to the development of metrics by the support function of the Nominating Committee, as an example.

Currently, ICANN org reports progress via the President and CEO reports and ICANN's Annual Report, which are published on icann.org. ICANN notes that the "Planning at ICANN" Operating Initiative includes a deliverable to develop a progress reporting framework to enhance the measurement of ICANN's activities. ICANN org looks forward to working with the community on this initiative once this work is underway.

4.3 Operating Initiatives

ICANN received forty-nine (49) comments specific to the Operating Initiatives in the Draft ICANN FY25-29 and Draft ICANN FY25 Operating Plan.

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

The ALAC highlighted ICANN's plans to continue migration to the Community Engagement System (CES). The ALAC noted that this tool is of paramount importance for the At-Large community. ICANN agrees that the CES will be a crucial tool for better understanding how, where, and how often community members participate in policy and advice development across the ICANN ecosystem. The CES program is a multi-year effort that ICANN continues to prioritize, including through the FY23 and FY24 President CEO Goals. In FY23, the CES was successfully integrated with ICANN Account, and extensive work was done to ensure compliance with applicable data privacy laws. ICANN will provide further updates in the coming months on specific milestones and ongoing progress of work on the CES, including on aspects relating to community enrolment in policy working groups.

The ALAC, ccNSO SOPC, and GAC submitted comments regarding resources for this initiative. Requests were made for additional tools to be considered. The ccNSO SOPC noted that increased funding may be needed under this initiative to achieve the ambitious goals in this area. ICANN org thanks the community for its support for uniform project and program management tools that are intended to assist the community to track, manage, and plan its work, to include ongoing policy activities and Bylaws-mandated work as well as activities community groups have committed to and for which they need to plan. As with the CES, ICANN's work to provide the community with these tools is also a part of the President and CEO Goals. ICANN plans to begin rolling out these tools with the community groups, in the expectation that they will be adopted in FY25 and beyond. In addition, continued successful migration to the CES will assist with identifying participation needs and developing targeted outreach and engagement efforts across each region.

ICANN's Policy Development Support and Engineering & Information Technology teams have been working collaboratively to ensure that resources are suitably allocated for support of tools the community needs to conduct its work. The ALAC inquired on the use of Slack as a potential tool. Consistent with good practice for all new tools requested, ICANN is currently evaluating the feasibility of providing Slack as a tool for community leaders to collaborate with their staff

support teams. The evaluation includes assessments of the financial viability, security aspects, and legal considerations involved. ICANN will provide updates on this assessment in the coming months. ICANN understands that each community group may have its view as to what tools are most needed and why. ICANN looks forward to engaging with the community to ensure that future resourcing and support of community tools is consistent with the community's evolving needs and priorities.

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

ICANN welcomes the ALAC's suggestion of providing reviews of the ICANN Fellowship Program and the NextGen Program to analyze how the respected programs have been successful in engaging and keeping the Fellows and NextGen as active participants in the ICANN Community. As part of the [FY24 CEO Goal #2 on Community Readiness](#), ICANN will be assessing various capacity building and newcomer programs, with a view toward streamlining the resources and support provided across the community. Metrics from current programs will be used to facilitate this analysis, building on prior assessments and improvements, including the tools and platforms to support these programs.

Recently, ICANN evolved the Policy Accelerator Program (originally formed as a pilot named the Policy Transition Program) to a three-semester curriculum designed to complement existing newcomer programs. The program is currently in its first semester and is anticipated to run through FY25. The ALAC commented that it looks forward to seeing positive outcomes for this program. Participant feedback and outcomes of this program will be included in the planned review.

The ALAC also commented that greater attention should be given to Schools on Internet Governance (SIGs) as part of ICANN's plan to evaluate specific community-led initiatives that support representation and inclusivity. It was suggested that ICANN should support SIGs with a budget item as they are considered an excellent and cost-effective way to introduce potential volunteers from different regions to the subject of Internet governance and ICANN. ICANN agrees that SIGs are useful avenues for increasing potential volunteers across the regions for ICANN policy work and often provide an opportunity to encourage new participants to apply for ICANN's Fellowship and NextGen programs.

In regard to providing a budget item, ICANN currently supports many SIG-related initiatives, including through sponsorship or direct participation each fiscal year. ICANN looks closely at its participation and support for regional and national SIGs. This support is organized and provided through ICANN's regional engagement teams as part of their annual strategic and resource planning and these types of contributions are considered in line with regional engagement efforts. In 2020, ICANN conducted a review of SIGs around the world and identified a set of good practices to guide the support of these initiatives.

ICANN encourages the community to continue to collaborate with its regional stakeholder engagement teams, including on work under [FY24 CEO Goal #6 on WSIS+20 Review](#), to support and promote the multistakeholder model. ICANN's Grant Program may also be a future path of support for relevant initiatives.

The ccNSO SOPC noted that in its view the scope of this initiative tends to describe existing processes rather than future efforts to increase global representation. Elvira Napwora's comment similarly highlighted that efforts should focus on delineating endeavors and policy

projects aimed at augmenting global representation and participation. It was also suggested that ICANN's participatory initiatives should evolve alongside emerging technologies. The comment requested that as ICANN engages with the community to identify potential improvements, an exploration of how it can integrate itself more deeply into contemporary technological landscapes is warranted. ICANN appreciates the feedback from the ccNSO SOPC and Elvira Napwora. The work described in the FY25–29 and FY25 Operating Plans describes several projects and activities intended to yield more current and relevant data that can be used to update existing initiatives relating to this Operating Initiative as well as inform future planning for new and additional work as this Operating Initiative evolves. This is also being operationalized through the [FY24 CEO goals](#). In addition, continued successful migration to the CES will assist with identifying participation needs and developing targeted outreach and engagement efforts across each region.

The ccNSO SOPC also raised concerns regarding whether resources are being provided to achieve the purpose, given the “stable funding” from FY24 to FY25. Specifically, the ccNSO SOPC would like to understand the actual activities under this initiative and resources available to evolve and strengthen the multistakeholder model, also taking into account the capacity of the community. ICANN would like to highlight that it strives to provide sufficient staffing, suitable tools and travel, meeting, technical, and other support that aligns with the community's current workload and evolving support needs. As resources are anticipated to be limited for FY25, ICANN will work with the community leaders to ensure that available support is directed towards agreed priority projects in a transparent and uniform manner across the Supporting Organizations and Advisory Committees (SOs/ACs).

ICANN will be reviewing the newcomer and other programs aimed at facilitating community readiness while also developing tools (such as the CES and uniform program management tools) to provide timely and accurate information about participation levels across the ICANN community and assist the SOs/ACs and community leaders with managing the workload and planning ahead for future work. In this regard, ICANN's ongoing efforts to provide suitable collaborative and virtual tools are also directed towards helping the community to work more efficiently in achieving timely outcomes.

4.3.3 Geopolitical Monitoring, Engagement, and Mitigation

The GAC and the BC noted that governmental regulatory attention related to Internet issues has become a key factor impacting the current Internet ecosystem and ICANN in recent years. The GAC and BC support that this Operating Initiative continues to be a key consideration across several of the functional activities in both the five-year and one-year plans, including in Government and Intergovernmental Engagement (pg 78, 80, and 198), Policy Development and Implementation Support (pg 181), and Community Engagement and Services (pg 188). The GAC and BC's recognition of this initiative as a key consideration underscores the shared commitment to addressing crucial considerations across various functional activities. ICANN appreciates the GAC's reaffirmation of its commitment to ICANN's mission in recognizing the increasing impact of governmental regulatory attention on the current Internet ecosystem.

The ccNSO SOPC commented that with exception of the reference to work with the GAC, other efforts to effectively leverage and assist in building the narrative in the engagement process are not reflected under this initiative. It was suggested that ICANN org should ensure a broader level engagement to allow for more information and experience to be shared. Specifically, it was requested that ICANN engage with ccTLD managers, their regional organizations, and committees such as the ccNSO Internet Governance Liaison Committee, given their proximity to

national governments and the ccNSO's global membership. ICANN recognizes the ccTLDs' proximity to national governments and the ccNSO's global membership. ICANN notes the main purpose of this Operating Initiative is to identify policymaking processes, legislative and non-legislative initiatives that might impact ICANN's ability to develop policies, operate effectively, and fulfill its mission. ICANN will also provide factual information to policymakers leading such processes. However, this operating initiative does include engaging with different parts of the ICANN community in their respective roles. While the reference to work with the GAC is explicit, ICANN's commitment to effectively contributing to the narrative in engagement processes extends beyond that single aspect. ICANN has multiple ongoing projects and dedicated work streams within the organization specifically tailored to enhance engagement processes. ICANN's efforts are aimed at fostering meaningful engagement with stakeholders on multiple fronts.

In relation to this initiative, the BC commented that it is encouraged with the emphasis being placed on DNS abuse, Registration Data Request Service (RDRS), Contractual Compliance and geopolitical engagement. Regarding RDRS, the BC thinks that the operating plan should be amended to include a meaningful review and analysis of the RDRS, and the overall activities related to reaching a comprehensive approach to collection and access to DNS registration data. ICANN appreciates the BC's comment and would like to note that usage of the RDRS is being regularly monitored and reported on in monthly reports. These reports are published for the community's review and discussed in detail with the GNSO Standing Committee, which is tasked with reviewing and analyzing the data to consider assignments such as trends that can be identified over a month-by-month period and possible technical updates that should be considered to RDRS among others.

4.3.4 ICANN Reserves

In the past, the ccNSO SOPC stressed the importance of ICANN maintaining a solid reserve to finance its operations and noting that the Reserve Fund is at a level above "an amount equal to one year of operating expenses as the minimum target level". The ccNSO SOPC welcomes additional discussion and consideration of an "appropriate" rather than "minimum" level of the Reserve Fund to avoid excessive reserves when funds might be better spent on other activities. The RySG also commented on the Reserve Fund and the continued supplementation to this fund. The RySG asked if ICANN org plans to seek ICANN Board authorization to return any of the \$36 million diverted from the Auction Proceeds. Similar to the ccNSO SOPC, the RySG suggested that the Board should determine on the appropriate level for the Reserve Fund. Separately, the BC commented that the Reserve Fund is projected to grow by \$1 million in 12 calendar months, towards having an estimated ending balance of \$173 million by the end of the fiscal year. ICANN notes that this growth is due to a conservative estimate of investment income.

It is important to note that in 2018, the Board approved a resolution confirming the [target level](#) of the Reserve Fund at a minimum of 12 months of operating expenses. Having the balance above the minimum helps ensure ICANN's long-term financial health and ability to fulfill its mission. Now having established the minimum balance, the Reserve Fund continues to grow due to interest income and not due to transfers from the business. However, ICANN welcomes feedback from the community as it reviews the investment policy to formalize the minimum, maximum, and target balances for the Reserve Fund. Based on a review of applicable benchmarks, ICANN aims to:

1. Formalize the minimum, maximum, and target balances
2. Define the events which will cause ICANN to draw on the Reserve Fund

3. Establish the mechanisms to utilize the Fund, return excess balances, and replenish the Fund, as necessary

ICANN also aims to formalize the status of the \$36 million transferred in 2018 to cover the IANA Stewardship transition costs.

ICANN hopes to collaborate with the community to help provide enough flexibility to ensure ICANN is well situated to deal with unforeseen circumstances while not restricting the use of excess balances to further the aims of the community.

4.3.5 Implement New gTLD Auction Proceeds Recommendations as Approved by the Board

ICANN would like to thank the community for submitting comments in support of the Grant Program. For updates on this program please refer to the Grant Program official webpage, <https://www.icann.org/grant-program-en>.

4.3.6 Promote and Evolve the DNS Through Open and Transparent Processes That Enable Competition and Open Entry in Internet-Related Markets While Ensuring the Stability, Security and Resiliency of the Domain Name System

The support of the BC and the ALAC for ICANN's work towards Universal Acceptance (UA) as part of this operating initiative is noted and appreciated. ICANN appreciates the ALAC's continued support on promoting Internationalized Domain Names (IDNs) and UA, including UA Day. ICANN regularly updates the community on its continuing progress on ICANN internal systems becoming UA ready at ICANN meetings. For example, ICANN recently made its emails support internationalized email addresses:

<https://www.icann.org/en/blogs/details/icann-universal-acceptance-update-support-for-internationalized-email-addresses-18-01-2024-en>

The ccNSO SOPC commented that the draft plan does not consider the ccNSO and its work in this area through the recently created ccNSO Universal Acceptance committee (UAC). ICANN thanks the ccNSO SOPC for pointing out the newly created UA Committee of ccNSO. ICANN appreciates the initiative of the ccNSO; and the UA Committee, which meets regularly online, is already being actively supported by relevant ICANN staff. ICANN aims to continue to support the ccNSO UAC. The drafting of the ICANN FY25 Operating Plans started early so this recent initiative was not included in the draft posted for Public Comment. The relevant section will be updated to include reference to the UAC.

The ccNSO SOPC also consulted the ccNSO UAC regarding this initiative and thinks that the envisioned scope of promotion is limited. ICANN notes on page 46 of the FY25 Operating Plan and Budget it states: "Promote UA adoption by conducting outreach to software developers and system administrators to promote UA readiness in their software tools, applications and email services." ICANN also notes that it considers the roles of governments important and their role in UA will be addressed through the support and outreach to GAC, as noted on page 144 where collaboration with GAC and working with governments and IGOs is identified. ICANN org continues to prioritize and update its systems and tools, and this effort is included in the FY25 Operating Plan and Budget. ICANN provides regular updates to the community during UA Community Update sessions at ICANN meetings to share the progress. If any specific systems

need to be prioritized, based on community discussions, such information could be communicated to ICANN org through existing mechanisms, e.g., by writing to UAProgram@icann.org.

The ALAC provided support towards the production of the Domain Name Marketplace indicators and commissioning of initiatives such as the Report of the 2023 Africa Domain Name Industry. ICANN would like to thank the ALAC for its comment and support for this work. ICANN affirms the value of regularly evaluating DNS marketplace evolution from a geographical perspective. ICANN will continue to support the production of such regional studies in the foreseeable future based on internal capacity and project prioritization.

The ALAC also inquired about the budgeting and planning of this initiative in regard to the New gTLD: Next Round and if ICANN considered factors such as the demand of new gTLDs and the resource impact to ICANN org's operational infrastructure. ICANN currently estimates the demand for new gTLDs at the same level as was in the 2012 round with approximately 2,000 applications. As part of the budgeting exercise for the Next Round, attention was paid to ensure that temporary work was performed by temporary staff and contractors whenever possible, while also evaluating the support needed to implement and manage the Next Round. As part of the Next Round implementation review, teams are noting all impacts the New gTLD Program Next Round will have on ICANN operations in order to ensure that plans are in place to allow operations to continue smoothly and not be overburdened by additional gTLDs.

4.3.7 Support the Evolution and Strengthening of the Root Server System and Root Zone Management

ICANN notes the ccNSO SOPC's comments and concerns regarding the risks and considerations that could impact this initiative. Specifically, the ccNSO SOPC seeks to understand what kind of other objectives might "crowd out" important rootzone-related development work and which other objectives are considered higher priority. In response to the question about why this risk was included as part of this initiative's consideration, it is because PTI relies on direct shared resources from E&IT as the "owners" of the Root Zone Management System (RZMS). These shared resources are not fully dedicated to the RZMS. Because PTI cannot control how engineering resources outside of PTI staff are allocated, this is always a risk when it comes to RZMS development. However, as evidenced by [FY24 CEO Goal #9 on IANA Services](#), ICANN prioritizes IANA and this initiative.

4.3.8 Improve the Depth of Understanding of the Domain Name Marketplace Drivers That Impact ICANN's Funding

ICANN would like to thank the ccNSO SOPC for its support of ICANN transitioning this initiative to an ongoing functional activity. ICANN noted that the ccNSO SOPC seeks assurance that data sets to support forecasting processes will be shared with the community and input will be sought to further enhance and validate these data sets. Please refer to the annual Funding Assumptions document for more information about this work.

4.3.9 Planning at ICANN

ICANN appreciates the ccNSO SOPC's involvement in this initiative and its work with the Planning Prioritization process. ICANN acknowledges the ccNSO SOPCs comments regarding specific Key Performance Indicators (KPIs) not always being detailed and improvements needed on progress measurement and reporting. ICANN org continually looks for ways to improve reporting and transparency. The Planning team will be working on a progress and

achievements reporting process, as part of the "Planning at ICANN" Operating Initiative deliverable. ICANN looks forward to working with the community on this initiative.

4.3.10 Request for Future Enhancement

One individual comment by Ruben Diaz Silva suggested the addition of a twelfth strategic initiative to communicate ICANN's crucial mission and the constantly evolving governing system within academic circles and other external groups. It was suggested that the multistakeholder model can serve as an important reference for establishing similar governance mechanisms in other fields. ICANN appreciates the comment and acknowledgment of the work done by ICANN. Please note that ICANN does convene sessions on Emerging Identifier Technologies at ICANN Public Meetings. ICANN also offers sessions on technical topics under the "Tech Day" series of sessions for discussions on new and emerging technology topics. ICANN also participates in events with a broader focus, such as Web Summit and RightsCon, to reach audiences beyond the usual participants in ICANN meetings. Further, the 11 operating initiatives tie directly to the FY21–25 Strategic Plan and the strategic goals set in that plan. Within ICANN's current Operating Initiatives and Functional Activities, there are several activities focused on engagement, and ICANN invites the community to participate in the development of ICANN's next Strategic Plan. Please review the Community page to find additional information as well as upcoming events: <https://community.icann.org/display/projfinadhocws/FY26-30+Strategic+Plan+Development>.

4.4 Functional Activities

ICANN received forty-six (46) comments regarding Functional Activities.

4.4.1 Constituent and Stakeholder Travel

The ALAC commented that it would appreciate flexibility in ICANN's Community Travel Support Guidelines to allow for more effective use of available travel funding and maximum participation of At-Large volunteers. This flexibility includes reallocation of funding to maximize in-person attendance at ICANN Public meetings and other meeting events, as well as initiating the travel process sooner to allow for ample time for participants to request visas. ICANN notes that the dates for ICANN Public meetings are provided in advance <https://meetings.icann.org/en/calendar>, through October 2028, with specific locations being added as they are confirmed. Each government and embassy have its own process for allocating and granting visas to the diverse and global attendees of ICANN Public meetings, and ICANN does not have the authority to dictate the pace of these processes. It is important for individuals seeking visas to understand that the embassy's decision-making process is independent of ICANN's operations and thus may vary in terms of speed and efficiency. The ICANN Travel Support Team generally engages with stakeholders 120 days (three months) before the upcoming meeting. If community groups are ready to select funded travelers sooner than 120 before a meeting, the Travel Team is willing to support earlier requests.

In some cases, ICANN faces factors that prevent earlier engagement with selected travelers, such as receiving a list of funded travelers later than expected or waiting on government or host letters with the approved processes coordinated with local embassies and consulates. This process is complex and often involves several agencies and often starts up to two years before a particular meeting. However, if ICANN is made aware that a person will be funded and will likely face visa application delays, ICANN Travel will work with them to get them the necessary documents to complete the process in a timely manner.

The ccNSO SOPC commented that the Travel Support Guidelines reflect a business-as-usual approach and that it does not align with operating initiatives to increase diversity and broaden the base of different stakeholders actively participating in ICANN Public meetings. The ccNSO SOPC would welcome dialogue on how proposed travel funding could strengthen the aforementioned operating initiatives. Please note that ICANN is committed to enhancing diversity and broadening participation across its global community. Travel serves as an important component in achieving these objectives. For example, annually, ICANN supports 165 individuals through initiatives such as Fellowships and NextGen programs, alongside offering translation services, regional engagement opportunities, and virtual participation options for all interested stakeholders. The GAC commented in support of the resource commitment in the Draft ICANN FY25 Budget to maintain constituency travel support at the current budget levels as it expects this may be needed to increase community travel support to encourage in-person attendance at ICANN public events. The GAC appreciates that the resources devoted to GAC travel in FY25 will offer flexibility for the committee leadership to organize strategic discussions and other activities that are important for committee planning and organizational efforts. ICANN appreciates the GAC's intention to carefully analyze its travel support needs in future fiscal years and for expressing its expectation to flexibly and efficiently utilize any allocated funds during FY25.

While acknowledging the significant expenditure associated with travel, ICANN is focused on optimizing spending to ensure effective contributions from funded travelers. Potential strategies may include leveraging technology for cost savings, negotiating favorable rates with travel providers, and prioritizing travel based on strategic importance. Meetings play a pivotal role in facilitating the multistakeholder model, and recent experiences during the pandemic have underscored the feasibility and efficacy of virtual and hybrid meeting formats. In the current landscape, environmental sustainability considerations will be paramount in evaluating any potential changes in an approach to travel funding. ICANN remains open to new and innovative ideas regarding how travel funding can best support its overarching goals of diversity and active engagement within the global community.

ICANN strives to review the ICANN Travel Support Guidelines every few years, with the most recent reviews in 2013, 2018, and 2020. Due to the COVID-19 Pandemic, there was no ICANN funded travel for a few years. It resumed in 2023. ICANN anticipates that the Travel Support Guidelines review will again occur in 2024. This will give the community the opportunity to contribute to the further development of these guidelines. By actively engaging in the Public Comment process, you are helping to shape policies that will benefit the ICANN community as a whole. ICANN encourages your continued participation and looks forward to receiving your valuable insights when the next Public Comment period opens.

4.4.2 Contractual Compliance

ICANN appreciates the BC's support for ICANN increasing headcount in its Contractual Compliance team to help mitigate DNS abuse which has been a focus for the BC and its members. ICANN notes that over the past two years, the Contractual Compliance headcount has increased by three Full-Time Equivalents (FTEs).

4.4.3 Engagement Programs

The ccNSO SOPC commented that the ccNSO and/or individual ccTLD managers could help to support activities in environmental sustainability strategy projects and other areas of sustainability. ICANN notes that [FY24 CEO Goal 8](#) on Environmental Sustainability is focused

on initiating the creation of ICANN's Environmental Sustainability Strategy. FY25 will mark the beginning of the planning process for ICANN's Environmental Sustainability Strategy. This will include discussions and consultations with the community on ways forward. The ccNSO, ccTLD managers, and any other interested community groups will be invited to participate in these discussions to share their feedback and expertise. The mechanism and timeline for such discussions will be informed by the creation of the overall strategy, which is slated to be delivered by the end of FY24. Though the details are not yet available, discussions on this topic will take place in FY25 and beyond.

4.4.4 Finance and Procurement

The ccNSO SOPC suggests that the underlying targets and/or milestones necessary to measure progress towards achieving the objectives of this function are not adequately defined. The ccNSO SOPC also seeks clarity as to where and when efficiencies and process improvements are reported to the community and how the community will know financial analysis is improving. ICANN continues to make improvements in financial reporting as work has expanded into different business segments, such as the Grant Program, and has thought of new ways of reporting its costs both internally and externally. This year, ICANN implemented Activity Based Reporting to provide more detail about where the ICANN Operations costs are incurred in a manner that attempts to provide additional clarity to the community. ICANN will look to better highlight new or improved aspects of financial reporting and analysis in the future.

4.4.5 GDD Accounts and Services

ICANN thanks the ALAC for its comments supporting the GDD team in its preparation for the New gTLD Program Next Round. This team is working to responsibly scale to ensure current support to registries and registrars is not compromised by the efforts to support the next round.

4.4.6 Global Communications and Language Services

The ALAC commented that it greatly appreciates the work of Language Services, and having real-time transcription incorporated in the core budget for At-Large Meetings has resulted in a significant increase in attendance, engagement, and participation on ALAC calls and meetings. The ALAC requests that real-time transcription include Spanish and French alongside English as was previously done in the pilot.

The ccNSO SOPC also requests that ICANN continues to provide adequate support in translation services, including live interpretation and transliteration at ccNSO meetings, including Tech Day. The ccNSO SOPC notes that language support is needed to ensure productive and effective participation of new participants in ICANN.

ICANN appreciates the comments and notes that:

ICANN adopted the use of Zoom's automated captioning in English, in June 2019. However, automated captioning in French, Spanish, Chinese, Russian, Arabic, and Portuguese were not robust enough to adopt captioning in languages other than English at that time. ICANN will continue to run additional tests of Zoom to determine whether the captioning in languages other than English has improved enough to implement the automated captioning feature in these other languages. Further, while a secondary platform has not yet been identified that meets ICANN's very specific needs, ICANN continues to search.

ICANN is glad to report that the simultaneous interpretation support provided for ccNSO SOPC sessions, as well as for Tech Day sessions, during ICANN Public meetings has been successful and well received. ICANN will continue to provide interpretation into any of the ICANN set of languages and accompany each call or session with the corresponding audio transcripts, to be most inclusive and support the community needs. ICANN looks forward to continuing supporting these groups during ICANN meetings as well as with teleconference calls and translation of material.

The GAC also inquired on the status of the sign language pilot which was requested during the FY24 planning process. ICANN notes that the feasibility study is still in progress for this request.

4.4.7 Global Meetings Operations

ICANN appreciates the ALAC's support of ICANN's Global Meetings Operations and agrees that regular, well planned globally distributed meetings with suitable logistics and accessible venues and accommodations are critical contributors to the invaluable aspect of ICANN's multistakeholder model.

4.4.8 Global Stakeholder Engagement and Regional Offices

ICANN appreciates the ALAC's comment with respect to the positive working relationship between the ALAC and the At-Large Community through its RALOs on the one hand, and the Global Stakeholder Engagement team on the other. ICANN looks forward to continuing to grow this relationship.

The ccNSO SOPC commented that activities that are described in this functional area appear as "engagement for the sake of engagement" and that objectives and underlying operational goals and milestones of the engagement efforts are not clear. ICANN's Global Stakeholder Engagement team welcomes a continued dialogue with the ccNSO SOPC in this regard. It is important for ICANN org to interact with a broad spectrum of stakeholders who may influence ICANN's work, even if these stakeholders do not become active participants in ICANN's technical and policy work. Engagement helps support awareness of ICANN's mission among governments, the technical community, academics, and businesses, among others. This activity cultivates future partnerships and awareness of the DNS and unique identifiers.

The ccNSO SOPC also commented that there is no reflection on the engagement activities with ccTLD managers and related organizations. The ccNSO SOPC notes that most initiatives and activities are very focused towards gTLDs and hardly refer to ccTLDs. In line with last year's comments, the ccNSO SOPC believes that closer cooperation between ICANN and the ccNSO Internet Governance Liaison Committee, relevant working groups of the regional ccTLD organizations, and individual ccTLD managers will be beneficial to the goals of the activities in this area. It is suggested that individual ccTLD managers could contribute effectively to engagement with local and regional stakeholders. However, this is not reflected, nor is partnership considered, in the activities as described. Also, given the increased need for engagement, the ccNSO SOPC believes it is unlikely that stable funding will be sufficient to meet these needs.

ICANN notes that the Global Stakeholder Engagement team regularly participates in the events of regional TLD organizations and supports capacity development and training with ccTLD operators in various regions. In the Africa region, projects such as the Coalition for Digital Africa regularly target ccTLD operators with Domain Name System Security Extensions (DNSSEC)

and capacity development training to encourage deployment of DNSSEC among ccTLD operators. In the Europe region, technical training and webinars are offered for ccTLD operators. ICANN org participates in regional TLD organization events, such as with the Council of European National Top-Level Domain Registries, the Asia Pacific Top Level Domain Association, Latin American and Caribbean Top-Level Domains, and the Africa Top Level Domains Organization. ICANN also engages with ccTLD operators serving as hosts for ICANN Managed Root Server (IMRS) instances and has an active project underway to replace and retire aging IMRS instances. ICANN has also encouraged ccTLD operators to migrate away from Secure Hash Algorithm 1 (SHA-1) to a more current DNSSEC algorithm. ccTLD operators have been encouraged to participate in the Office of the Chief Technology Officer's Domain Abuse Activity Reporting project, and ccTLD operators have been engaged on DNS abuse mitigation efforts. Continuing collaboration with ccTLD operators on the local and regional level would be welcomed. ICANN looks forward to a future opportunity to discuss with the ccNSO SOPC how ICANN's engagement efforts are broad in scope, not only for gTLDs.

ICANN also appreciates the GAC's comments in regard to the workshops around the GAC's Underserved Regions Working Group and Public Safety Working Group. ICANN has facilitated GAC capacity development workshops and will continue to support mechanisms for GAC members to become more active participants in ICANN's work.

4.4.9 Government and Intergovernmental Organization Engagement

ICANN appreciates the ALAC's support and recognizes the critical role of engaging in international activities such as the World Summit on the Information Society (WSIS), the International Telecommunication Union (ITU), and U.N. committee discussions within the Internet governance (IG) ecosystem. The FY24 [CEO goal 6](#) reflects the strategic investment ICANN is committed to in supporting the multistakeholder model of IG within the same context as the comment.

The ccNSO SOPC suggests a need to reflect on the ICANN's engagement efforts, including on when and how individual ccTLD managers should or could be part of efforts to build and support effective global engagement activities with local governments and intergovernmental organizations (IGOs). In last year's comments suggesting a similar approach, the ccNSO SOPC noted that a proper reflection will avoid counter-productive engagement efforts. As stated above, the ccNSO SOPC believes that adequate resourcing in this area is needed, for example to execute ICANN's WSIS +20 agenda. ICANN org is committed to sharing information among policymakers and beyond about the Internet's key technical functions, ICANN's mission, and role in technical IG and the work of the ICANN multistakeholder community to ensure a single, globally interoperable Internet. Efforts by the community that complement advancing the understanding of those issues are more than welcome and appreciated. The [CEO goal 6](#) on WSIS+20 and the activities in line with it across the community are reflective of this.

4.4.10 Grant Program

ICANN received a comment from an individual, Kossi Amessinou, recommending the Grant Program to consider supporting more women and providing capacity building for them. The Grant Program is a competitive, global grant program that supports projects that are consistent with ICANN's mission. For the first cycle, proposed projects should address at least one of the funding themes and associated work areas as listed in the Applicant Guide, including the transversal theme of "Diversity, participation, and inclusion of underserved populations", that

should be considered by the applicants in the design of their projects. The Applicant Guide is available on the ICANN Grant Program webpage at <https://www.icann.org/grant-program-en>.

4.4.11 IANA Functions

The Internet Assigned Numbers Authority (IANA) is a functional activity of ICANN. The IANA functions include maintenance of Internet number resources, management of the DNS root zone, and other operational aspects of coordinating the Internet's unique identifiers. See section 5.0 in this document regarding the IANA Operating Plan and Budget. In addition, there is a separate PTI Public Comment proceeding [here](#).

The ccNSO SOPC notes that from a ccTLD perspective, the functional activities in the Technical and DNS Security Services Group, IANA functions are critical, and continuity and an adequate level of the services provided in this area needs to be guaranteed. Therefore, the ccNSO SOPC urges ICANN to ensure IANA is adequately resourced, and when needed, additional resources are provided to IANA. IANA needs to be in a position to deliver on additional anticipated activities such as implementation of new policies and potential updates to IANA function service level agreements. The ccNSO SOPC also notes that IANA should ensure it plans for any staff and knowledge loss. ICANN takes note of these comments and would like to highlight [CEO Goal #9 IANA Services](#) as a reassurance that ICANN is prioritizing IANA. ICANN encourages the ccNSO SOPC to review [Community Recommendations in the FY25 Operating Plan and Budget](#) for assumptions made for community recommendations not yet approved by the ICANN Board.

4.4.12 Ombuds

The ALAC notes that regarding accepted recommendations stemming from Work Stream 2 of the Cross-Community Working Group on Enhancing ICANN Accountability, the Office of the Ombuds must include in its final Ombuds-related recommendations, all recommendations yet to be finalized or already implemented from the previous ICANN Ombuds Office. The ALAC notes that this should be included in the operating initiative contributions section of the Ombuds Functional Activity within the FY25 Operating Plan and Budget Plan. ICANN agrees with the ALAC, and this will be modified in the plan.

4.4.13 Policy Development and Advice

The ALAC recognizes that ICANN policy development processes and advisory work of ICANN Advisory Committees are both core to ICANN's multistakeholder model of operation and require suitable staff support. They commented that these processes require a considerable number of resources, but the proposed levels are appropriate. The ALAC also notes that metrics tracking is an important aspect of transparency and accountability in the deployment of these resources, but also understands that such tracking requires additional resources. ICANN is committed to ensuring it provides sufficient resources, including Policy Development Support staff. The balancing of resources takes into account factors like the current budget environment, priorities identified by the ICANN Board and community, and future projections. ICANN looks forward to continuing to improve how community consultations and input can be further integrated at an early stage into the annual budgeting and planning process.

The ALAC also notes that suitable, and preferably experienced, staff are needed to fill the current staffing voids and to ensure this is done promptly to prevent the slowdown of progress of work plans, which the ALAC suggests could be done by formulating a list of pre-approved consultants. ICANN notes that recent vacancies on the Policy Development Support team have

been filled via ICANN's regular recruiting process, including contracting with consultants where appropriate. ICANN notes that the Policy Development Support function has evolved over the years to match the needs and expectations of the community, including through the formation of the staff teams focusing on special projects and providing coordinated support for cross-functional, cross-community, and community operations work (such as the Strategic Community Operations, Planning and Engagement, and the Policy Strategic Management teams).

The ccNSO SOPC inquired about the implementation of ccNSO policy recommendations. As part of its annual budget and planning process, ICANN takes into account any upcoming and ongoing implementation projects as they are known and as appropriate. ICANN does not typically call out every project in the plan documents. ICANN does note that the implementation of ccNSO PDP3 is listed on the five-year roadmap and accounted for in ICANN's planning and budget.

ICANN thanks the ccNSO for its recent and ongoing policy development work, which has resulted and will continue to result in important new policies related to the ccTLD community. ICANN is committed to ensuring that implementation of all Board-adopted policies is planned, budgeted for, and executed in as timely a manner as is feasible, taking into account resources available and the outcomes of the Board's and community's prioritization work.

4.4.14 Policy Research and Stakeholder Programs

ICANN appreciates the ALAC's support for this area of ICANN's work. The mission of the Policy Research & Stakeholder Programs team includes research and study activities in support of the Bylaws provision to enable informed participation in the ICANN multistakeholder model. ICANN aims to continue building and enhancing these capabilities.

4.4.15 Planning

The ccNSO SOPC notes that there is a new stronger emphasis on timely reporting and metrics for plan and strategic plan progress compared with the previous Operating Plan. ICANN's Planning team will be working on a progress and achievements reporting process, as part of the "Planning at ICANN" Operating Initiatives deliverable and to support the Board Strategic Committee's work plan of measuring and reporting progress of ICANN's FY21–25 Strategic Plan. ICANN looks forward to working with the community on this initiative.

The ccNSO SOPC also commented that the budget for the Planning Functional Activity increases compared to FY24 with the interpretation that this is due to an increase in FTE. ICANN notes that the total headcount at the end of FY23 for the Planning team was six, including the economist. The Planning team is responsible for the Bylaws- mandated planning processes, such as the Operating and Financial Plans, the Strategic Plans, and the economist function. The primary driver for this increase in headcount as compared to the FY24 Budget is the development of the FY26–30 Strategic Plan and for the implementation of the Board adopted ATRT3 specific reviews recommendations for Planning Prioritization and Progress Measurement and Reporting projects.

4.4.16 Strategic Initiatives

ICANN appreciates the ALAC's support for ICANN's core functions, strategic initiatives, as stated and agreed to, and specific stakeholder and community activity support and agrees that they are important.

The ccNSO SOPC commented that the focus seems to be on gTLDs and more technical topics. ICANN thanks the ccNSO SOPC for its comment.

4.4.17 Technical Services

ICANN appreciates the ALAC's comment and acknowledges the importance of sufficient resourcing, so this function is not impaired.

4.5 Financial Management

ICANN received forty (40) comments with the theme of Financial Management.

4.5.1 Financial Reporting Schedules

This year, as part of ICANN's goal to simplify financial reporting for the community, the Draft FY25 ICANN Budget includes a new Activity Based Reporting. Overall, ICANN received supportive comments from the ALAC and the ccNSO SOPC on this new additional reporting breakdown. ICANN org hopes this additional reporting will be useful for better understanding of costs in relation to ICANN's core work and mission.

The RySG requested clarity on the future use of Activity Based Reporting. Activity Based Reporting is reflective of ICANN's internal method of activity-based costing. ICANN also sees value in producing actual and over time figures with Activity Based Reporting and has started producing actual versus budget results in its quarterly management financials. ICANN will take steps to ensure that Activity Based Reporting accomplishes the goals of simplifying and adding transparency, including making clear through discussions, as needed, on how this reporting structure is different from the other reporting structures ICANN also uses. In the short term, ICANN will display both traditional and Activity Based Reporting but if the latter is well received, ICANN may consider mostly using Activity Based Reporting for ICANN Operations expenses.

Further on the subject of Activity Based Reporting, the BC also commented that as a technical organization it would be helpful to track what percentage of ICANN's budget is directly devoted to technical functions as compared to Operations and Community Engagement Systems. ICANN notes that as IANA activities are a part of ICANN Operations, the \$11.5 million IANA Budget is already included in the \$24 million Technical Mission activity and the overall \$148 million budget for ICANN Operations. Therefore, the technical functions such as infrastructure and maintenance is the \$19.7 million Engineering & IT portion plus the \$24 million Technical Mission activity.

The RySG also suggested that zero-based accounting could help streamline the spending proposal. ICANN has a bottom-up process of budgeting which is akin to zero-based budgeting. In actuality, the level of ICANN's work far exceeds its available funding. Executives work with each other and their individual teams to prioritize work and determine what can be budgeted given the available funding.

The ccNSO SOPC requested clarity for the Draft FY25 ICANN Budget. It was noted under the travel/meeting costs that forecasted expenses dropped from \$17 million in FY24 to \$13 million in FY25 (section 4.1, page 12). The ccNSO SOPC suggests it should be a 'favorable' difference change of \$4 million instead of the \$3 million in the "FY25 vs. FY24 Favorable/(Unfavorable) Forecast" column. A question was raised if this might be due to rounding the figures or due to another factor. ICANN clarifies this difference is due to rounding. As the Introduction of the Budget document states, any arithmetic inconsistencies are due to rounding.

4.5.2 Funding Assumptions and Projections

ICANN thanks both the BC and the SOPC for their support of the “base” scenario funding forecast included in the Draft ICANN FY25 plans, which is in line with current growth rates observed by these groups. ICANN continually strives to ensure the organization's financial sustainability.

ICANN's funding will be reevaluated using the latest funding assumptions and projections. Any updates resulting in changes to the FY25 plans will be provided to the community.

4.5.3 Headcount and Personnel

The BC acknowledged that ICANN's increased personnel cost for FY25 will be offset by efficiencies in Travel & Meetings and Professional Services but seeks a better understanding of what reductions need to be made to accomplish \$6 million in savings to these other areas. In addition to efficiencies in Travel & Meetings, ICANN will find efficiencies in Professional Services by streamlining and reducing the use of contractors. ICANN also notes that although FTEs are not growing in ICANN Operations, FTEs are growing in ICANN's other segments such as the New gTLD Program. Staffing levels will be appropriate to fulfill strategic and operational initiatives.

4.5.4 New gTLD Program

The BC notes that there are allocations to ICANN Operations for programs that have their own funding from the funds under management. These programs include New gTLD Program 2012 Round, New gTLD Program: Next Round, and the Grant Program. The BC requests clarification of how the ICANN Operation budget is supporting these programs rather than being supported by their own funds. ICANN notes that each segment is supported by its own funds with the exception of the New gTLD Program Next Round that is temporarily utilizing other funds that will be offset once the next round application window is open, and funding is received. The reference to allocations were for ICANN org administration and support costs that each segment utilizes. These costs are for support services such as payroll, invoice processing, and facility costs. The segments receive costs for these items in proportion to their usage. All these expenses are reimbursed to ICANN Operations by the segment funds under management.

The BC also comments that it is aligned with the importance of Policy implementation work to ensure the timeline for opening the next round of applications for new gTLDs. ICANN thanks the BC for its comment and believes that the work including systems development and testing as it relates to the New gTLD Next Round will be completed by Q2 calendar year 2026, unless for some unforeseen events.

4.5.5 Grant Program

The ccNSO SOPC noted concern about the high overhead rate of 40 percent, or \$4 million in support costs, to run the Grant Program for \$10 million in expected grants. Over the lifecycle of the grant program, costs to operate the program will be maintained at 7 to 10 percent of the anticipated grant distributions. Costs to launch the program and operate it are regularly benchmarked against global grant programs. For FY23 and FY24, one-time costs were incurred for the implementation of the program. With the launch of the program in March 2024, costs to run it will remain relatively stable.

4.5.6 Supplemental Fund for Implementation of Community Recommendations (SFICR)

ccNSO SOPC and the ALAC both raised concerns over the projected usage of the SFICR. The ccNSO SOPC noted that the information in the Financial Overview section implies that for the upcoming year the New gTLD Program: Next Round implementation work is mostly funded from the Operating Fund Excess (via SFICR) and that a minor part of funding comes from New gTLD Program 2012 round funds. The ccNSO SOPC expressed concern that using a large portion of the SFICR for Next Round may crowd out other activities pertaining to other initiatives. The ALAC was concerned with the simultaneous handling of two funds (SFICR and the ICANN Grant Program) and commented that currently it is unclear whether the SFICR will be replenished once the Next Round is in place and generates funding. The ALAC notes that the financials for the Next Round only include the projected costs and asks if there is any projected revenue or income estimated for the Next Round.

In October 2023, the Board approved a \$20 million transfer from the Operating Fund to the SFICR as a result of excess generated in the Operating Fund after FY23. In the same month, the Board also approved for the SFICR to fund the New gTLD Program: Next Round expenses from November 2023 through June 2024, estimated to be \$13 million. The \$20 million transfer to the SFICR was conducted with the intention of mostly funding Next Round expenses because funding with the New gTLD Program 2012 Round funds will not be sufficient to completely cover Next Round expenses before receiving Next Round application fees. As of 31 January 2024, the SFICR balance is at \$37 million. Future transfers to the SFICR will be considered by the Board if there is any excess in the Operating Fund at the end of each fiscal year.

The New gTLD Program Next Round is designed to be cost recovery which implies that all the implementation costs and the cost to process applications will be recovered in the application fee for a TLD. Revenue for the Next Round will be realized when the application period opens in Q2 2026.

4.5.7 Contingency

The BC commented that the Contingency allocation remains at a level for FY25, and beyond which has been an adequate amount historically. This amount is \$5 million, although the BC wrote \$500,000 which ICANN assumes was a mistype. The BC commented that the Commercial Stakeholders Group (CSG) and Non- Commercial Stakeholders Group (NCSG) (collectively NCPH) have developed plans to meet periodically for intersessional gatherings. The BC asked whether funding for these meetings can be considered within Contingency rather than to be separately budgeted, and if separately budgeted, the BC would like to know the application timeline for such approvals. The contingency line item in the budgets is not meant for planned events such as intersessional meetings as contingency is reserved for unplanned activities that by virtue of their unplanned nature cannot be identified by functions in advance. If an event is not budgeted in a future year, ICANN encourages community groups to submit a resource request as part of the Operating Plan and Budget Public Comment proceeding, which generally runs from mid-December to mid-February every year.

4.5.8 Travel and Meeting Expenses

The ALAC and the BC requested clarity as to why the Travel & Meetings budget projection is a fixed \$13 million per year for the next five years even though post-pandemic travel cost has seen a sharp increase. The BC further wants to ensure that Travel Estimates are considering prospective locations of meetings.

Inflation is taken into account in the plans. The Travel & Meetings values in the five-year financial plan begin with the FY25 Budget value for Travel & Meetings and assume this value will continue to be met by finding efficiencies. Since inflation related to travel and meetings expenses is likely to impact future years, this may mean sending fewer people to meetings or conducting more meetings virtually.

To project these expenses, travel estimates are based on prospective location if known based on meeting rotation requirements. ICANN consistently reviews global market trends and consults with third-party travel consulting agencies on future costs of airfare and hotels. Factors considered in estimating costs are seasonality, supply, demand, booking lead times, inflation, and variations in exchange rates.

4.5.9 Additional Budget Requests

As noted in the blog [“Streamlining Resource Requests from the ICANN Community”](#) the Additional Budget Request (ABR) process has ended. ICANN accepted comments related to this process in this Public Comment proceeding. ICANN received eight comments on this topic. Within the eight comments, four were specific requests from the ALAC, GAC, and RySG for additional funds. ICANN will consider these requests as part of the process to prepare a revision, if any, of budget and planning materials for the Board's consideration. At the time of publication of this Summary Report of Public Comment, no final decision can be made regarding the budget as further analysis and Board adoption is required.

The remaining four of the eight comments from the above groups, ccNSO SOPC, and BC were requesting clarity on this process and what steps the community should take going forward in regard to requesting additional resources. ICANN org ended the separate ABR process in order to streamline resource requests from the community into one process, which is the annual Operating Plan & Budget process. This change is expected to result in more efficiencies. As the process change was recent, ICANN wanted to evaluate the types of responses received for FY25. ICANN also noted that since 2017 the number of requests submitted through the ABR process has decreased and that this is mainly due to the transition of ABR allocations from successful pilot projects to programs now managed through the annual Operating Plan & Budget. ICANN will continue to evaluate this process and consider a solution that restores part of the basic structure to requesting resources that was found in the older ABR template for future budgeting and planning cycles. ICANN org also encourages that community groups regularly review their resourcing with their support teams.

Section 5: Draft IANA Operating Plan and Budget

The IANA functions include maintenance of Internet number resources, management of the DNS root zone, and other operational aspects of coordinating the Internet's unique identifiers. IANA is a functional activity of ICANN. See section 4.4.10 in this document regarding the IANA functional activity in the ICANN Operating Plan and Budget. In addition, please consult the separate PTI Public Comment proceeding [here](#). One (1) comment received during this proceeding was specific to the FY25 IANA Operating Plan and Budget. The ALAC commented in support of the draft budget as it takes into account inflation. Support was also shown in another ALAC comment for the increase in full-time personnel to support this function.

Section 6: Next Steps

ICANN appreciates all community input and support in this Public Comment process. ICANN reviewed and responded to all comments received, and where appropriate, will incorporate the comments into the next version of FY25 planning documents or, will evaluate and incorporate into the further planning cycle as appropriate.

Following the publication of this report, ICANN will update the: (i) Draft ICANN FY25 Budget; (ii) Draft ICANN FY25–FY29 Operating and Financial Plan, Draft ICANN FY25 Operating Plan; and (iii) Draft IANA FY25 Operating Plan and Budget, taking into consideration the Public Comments, and where appropriate and feasible, incorporate the comments into the next version or Proposed for Adoption plans. These plans will be published and available prior to the Board’s consideration.

In May 2024, the Board Finance Committee will consider recommending that the Board adopt the: (i) ICANN FY25 Budget; (ii) ICANN FY25-FY29 Operating and Financial Plan, FY25 Operating Plan; and (iii) FY25 IANA Operating Plan and Budget. Following the Board’s adoption of these plans, the Empowered Community may consider whether to reject the plan as adopted. If no Empowered Community rejection process remains pending, the proposed plans will go into effect on 1 July 2024.

Section 7: Appendix

7.1 Public Comments Received During Submission Period

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
AT-LARGE ADVISORY COMMITTEE	We appreciate the presentation of the budget breakdown by activity, especially within each activity because this allows easier understanding of fund allocations.	See 4.5.1
AT-LARGE ADVISORY COMMITTEE	<p>We notes that the Budget and Strategic plans still have some deficiencies:</p> <ul style="list-style-type: none"> ○ Missing alternative texts for the images/graphs ○ Poor color contrast, and ○ Poor tagging <p>These deficiencies limit accessibility by persons with disabilities, effectively hindering their participation in the comment process. Care ought to be taken to institute accessibility checks, for example, by relying on accessibility checkers found in Adobe Acrobat, Microsoft Word or Excel.</p>	See 4.1

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
AT-LARGE ADVISORY COMMITTEE	<p>The ICANN Fellowship Program and the NextGen@ICANN Program We suggest a review of these two programs using, not only statistics collected by the program managers, but by a deeper dive into various metrics related to past and current Fellows and NextGeners. Metrics which analyze how the respective programs have been successful in, not only identifying, but nurturing, engaging and keeping the Fellows and NextGeners in demonstrably active participation in various parts of the ICANN Community, would be invaluable for improving the programs' utility in sustaining the ICANN multistakeholder model.</p>	See 4.3.2
AT-LARGE ADVISORY COMMITTEE	<p>Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking Included in the scope of this operating initiative is the intention to evaluate specific community-led initiatives, such as those - that support representation and inclusivity (eg. "This evaluation will aid the community in determining any additional actions needed to maintain inclusivity and global representation within ICANN policymaking.") To this end, we urge that greater attention be given to a third important channel: Schools of Internet Governance (SIGs). In particular, we propose adding a budget item, allowing for some stable and predictable funding for SIGs. Such a budget item could offer funds to be distributed among the SIGs operating in the fiscal year in some agreed upon prorated manner. Such schools are volunteer-driven, mostly convened by veteran ICANN participants specifically to bring in more volunteers. Some expectation of stable funding would make a significant difference to those who donate their time, energies, and sometimes temporarily guarantee funding personally while they wait for sponsorship resources to materialize. We believe that SIGs are community engagement activities that ICANN should support and we are pleased to hear that similar recommendations are coming from other stakeholder groups. These SIGs are an excellent and cost-effective way to introduce potential volunteers from different regions to the subject of internet governance in general and ICANN in particular.</p>	See 4.3.2

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
AT-LARGE ADVISORY COMMITTEE	<p>Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking</p> <p>Facilitating the engagement paths of different levels of community members is seen as ever more critical, given the volunteer burnout that many community members experience. Tools and programs focusing on onboarding, skill building, and leadership development would result in more effective and inclusive participation in policymaking. In this respect, we look forward to seeing positive outcomes for the Policy Development Accelerator Program for ICANN newcomers specifically for the ICANN Fellowship Program and the NextGen@ICANN Program participants and alumni.</p>	See 4.3.2
AT-LARGE ADVISORY COMMITTEE	<p>Promote and Evolve the DNS Through Open and Transparent Processes That Enable Competition and Open Entry in Internet-Related Markets While Ensuring the Stability, Security, and Resiliency of the DNS</p> <p>The production of the Domain Name Marketplace Indicators and other supporting analysis remains important to the ALAC and the At-Large Community as indicative means to keep check on the health of the DNS industry. They provide useful data points which can be examined and extrapolated for the formulative of both reactive and proactive steps in ensuring the stability, security and resilience of the DNS.</p>	See 4.3.6
AT-LARGE ADVISORY COMMITTEE	<p>Promote and Evolve the DNS Through Open and Transparent Processes That Enable Competition and Open Entry in Internet-Related Markets While Ensuring the Stability, Security, and Resiliency of the DNS</p> <p>Commendable also are the commissioning of initiatives such as the Report of the 2023 Africa Domain Name Industry Study, and the Middle East Domain Name Industry Study 2023, which we support, and we encourage ICANN org to do the same with other regions; noting the last Latin American and Caribbean DNS Marketplace Study was published in 2017.</p>	See 4.3.6

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
AT-LARGE ADVISORY COMMITTEE	<p>Promote and Evolve the DNS Through Open and Transparent Processes That Enable Competition and Open Entry in Internet-Related Markets While Ensuring the Stability, Security, and Resiliency of the DNS</p> <p>We hope that ICANN org will indeed continue to carefully manage its planning and budgeting in consideration of several factors:</p> <ul style="list-style-type: none"> • Reasonably conservative assumptions in the demand of new TLDs; • Flexibility in engaging contractors and temporary staff as opposed to permanent ICANN staff to support the upcoming application round; and • Not compromising the planning and implementation of the operational infrastructure (systems, processes, and people) needed to support the ongoing operations of the New gTLD Program, especially for compliance monitoring. 	See 4.3.6
AT-LARGE ADVISORY COMMITTEE	<p>Promote and Evolve the DNS Through Open and Transparent Processes That Enable Competition and Open Entry in Internet-Related Markets While Ensuring the Stability, Security, and Resiliency of the DNS</p> <p>In respect of Universal Acceptance (UA), we appreciate that ICANN org has taken steps to ensure that all of its customer/user-facing interfaces/systems are UA-compliant, and its continual support for the Universal Acceptance Steering Group (UASG) and the UA Day initiative. We also look forward to progress by ICANN org (and updates thereof) in requiring, selecting and/or migrating to system vendors that comply with UA in its procurement practices, to further champion UA.</p>	See 4.3.6
AT-LARGE ADVISORY COMMITTEE	<p>Evolve and Strengthen the ICANN Community’s Decision-making Processes to Ensure Efficient and Effective Policymaking</p> <p>We believe this CES is a crucial tool to help the community make more effective use of its active volunteer workforce, and that it is a vital piece to the ALAC’s ability to deliver on Recommendation 16 of the Second At-Large Review, which has to do with the establishment and collection of consistent performance metrics for At-Large Community members. As such, the rollout of this CES for the At-Large community is of paramount importance to us. Concurrently, we look forward to receiving access to uniform project and program management tools to better track and manage not only ALAC and At-Large projects and activities, but also our participation in ICANN projects and activities, for better overall volunteer resource allocation to meet workload demands from existing projects and</p>	See 4.3.1

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
	<p>activities and those in the pipeline. Another key consideration that ought to be included under this Operating Initiative [4] is to address the ALAC's repeated call for more effective collaborative tools such as Slack to be adopted by ICANN org in support of our community's work.</p>	
<p>AT-LARGE ADVISORY COMMITTEE</p>	<p>Policy Development and Advice Suitable support for the ICANN Policy Development Processes, as well as the support of the advisory work of ICANN Advisory Committees, is core to ICANN's Multistakeholder Model of operation and a considerable but absolutely appropriate and required use of resources. Moreover, metrics tracking is an important aspect of transparency and accountability in the deployment of these resources and ALAC and the At-Large Community support this. However, we also note that such tracking to be effective and useful will also take significantly more resource allocation. Similarly, part of the ICANN Community that benefits greatly from the provision of suitable and effective resourcing, including Policy Support staffing for its activities, is insufficient to permit much, if any, expansion to additional policy-related projects or activities in support of either volunteer efforts or comply with organizational requirements or new activity planning.</p>	<p>See 4.4.13</p>
<p>AT-LARGE ADVISORY COMMITTEE</p>	<p>Policy Development and Advice We also note that suitable, and preferably experienced, staff are needed to fill the current void. Even if budgeted, this action still needs to be done promptly to not slow down the progress of work plans, which has not always been the case. Therefore, this may require some further preparatory work, including formulating a list of pre-approved consultants.</p>	<p>See 4.4.13</p>

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AT-LARGE ADVISORY COMMITTEE	<p>Policy Research and Stakeholder Programs</p> <p>The ALAC and the At-Large Community notes the importance of specific Policy Research in various stages of ICANN Policy Development and implementation of various Board-approved recommendations (like the Continuous Improvement Program and the Pilot Holistic Review). In addition, we also note that several Specific Review Teams have called for, and have had variable success to appropriate study and research requests. While we recognize these activities are demanding on ICANN resources, consideration of and budgeting for Policy Research and Stakeholder Programs at an appropriate degree that better provide for fact-based decision-making is important and will allow for greater predictability in those processes, stability and overall effectiveness of the outcomes.</p>	See 4.4.14
AT-LARGE ADVISORY COMMITTEE	<p>Technical Services</p> <p>The ALAC and the At-Large Community recognize and agree that, as stated, <i>'...additional staff and resources will be [needed to] ensure that the following is implemented:</i></p> <ul style="list-style-type: none"> ● <i>EPDP on the Temporary Specification for gTLD Registration Data Phase 2 implementation.</i> ● <i>Operational readiness planning to support future gTLD applications and operations.</i> ● <i>Increased responsibilities, e.g., Centralized Zone Data Service, Registry System Testing, Technical Onboarding re-platforming, implementing the Registration Data Access Protocol amendment, and implementing changes related to the Registration Data Policy.</i> <p>It is important, if not critical, that sufficient resources, including staffing, are available so this function is not impaired.</p>	See 4.4.17
AT-LARGE ADVISORY COMMITTEE	<p>Functional Support for Strategic Initiatives</p> <p>This essential support for ICANN's core functions, strategic initiatives as stated and agreed to, and specific stakeholder and community activity support are important. We trust that it has been carefully provided for in planning and budgeting. What is important is that if another necessary and supported work is also needing to be undertaken, it can be provided for without negatively affecting the support for Strategic Initiatives.</p>	See 4.4.16

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
AT-LARGE ADVISORY COMMITTEE	<p>ICANN Community Travel Support Guidelines</p> <p>We are asking that the TSG include greater flexibility in how the ALAC allocates the existing travel envelope. The ALAC is in the process of developing a travel policy that incorporates utility, recognition and diversity to ensure that there is more effective use of the available travel funding and maximum participation of At-Large volunteers. This would include a more fungible approach to when the total number of ALAC travel lots for any one fiscal year are used. For example, the more flexible policy might result in fewer At-Large representatives receiving travel support at one meeting and more during the AGM. <u>This is so that travel to an ICANN meeting can be viewed as recognition for volunteer contributions rather than an entitlement based on position held. This flexibility would also allow for more extensive At-Large regional engagement in ICANN activities during ICANN Meetings.</u></p> <p>If there is more flexibility in the TSG, then the ALAC and the At-Large Community could, at short notice, make better use of otherwise unused or lost travel funds. Specifically, it should be possible for the funds that become available through canceled travel to be quickly reallocated to support other active participants who might be available for in-person participation at the event.</p>	See 4.4.1
AT-LARGE ADVISORY COMMITTEE	<p>ICANN's Travel Team and Contracted Travel Management Service Provider</p> <p>The ALAC and the At-Large Community is concerned that the current deadlines to finalize travel plans for approved travelers is often very short despite being announced in advance. This results in those At-Large members with day jobs who are allocated travel support little time to get leave approved in time to meet the deadlines. This leads to an increased risk of some cancellations for various unforeseeable reasons close to the event date.</p> <p>Further, for several travelers it takes many weeks or months to get a visa and sometimes people are not successful. This often happens too late to substitute another funded traveler. Therefore, we ask that the travel process start sooner so that people could get the visas needed. Also, if these visas cannot be obtained there be additional time allocated to substitute another traveler.</p>	See 4.4.1
AT-LARGE ADVISORY COMMITTEE	<p>Travel and Meetings</p> <p>Separately, we would like to understand the rationale for the Travel and Meetings budget projection of a fixed USD 13 million per year for the next 5 years even though post-pandemic travel cost has seen a sharp increase.</p>	See 4.5.8

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
AT-LARGE ADVISORY COMMITTEE	<p>Global Stakeholder Engagement</p> <p>The ALAC and the At-Large Community through its RALOs have, over many years, developed close and complementary working relationships with Global Stakeholder Engagement (GSE). As such, we consistently see and appreciate the complementarity and importance of the work they do and we continue to stress that sufficient support be provided for them to function at an optimal level, and they are able to support some specific RALO activities.</p>	See 4.4.8
AT-LARGE ADVISORY COMMITTEE	<p>Global Stakeholder Engagement</p> <p>In the cases where community engagement and capacity development occurs through Regional Schools of Internet Governance (SIGs) organized by active members of ICANN constituencies, we have made the case earlier in this comment for a new specific budget item to provide for a more predictable ICANN contribution to these efforts.</p>	See 4.3.2
AT-LARGE ADVISORY COMMITTEE	<p>Global Meetings Operations</p> <p>The ALAC and the At-Large Community appreciate the benefits of regular, well-planned and globally distributed meetings; suitable logistics, contracting and even sourcing of suitable and accessible venues, inclusive of sufficient accommodation options. These factors are a critical contributor to what we believe is a unique and invaluable aspect of ICANN's Multistakeholder Model that reflects a rare openness to the general population and stakeholder or interested party engagement via both the annual public meeting cycle and the various regional and sub-regional supported activities.</p>	See 4.4.7
AT-LARGE ADVISORY COMMITTEE	<p>Government and Intergovernmental Organization Engagement</p> <p>The importance of ICANN in the ecosystem of Internet Governance makes it essential to engage in the international activities listed such as the World Summit on the Information Society (WSIS), the International Telecommunications Union (ITU), UN committee discussions on cybercrime, as well as engaging in educational/consultational activities arising from legislative activities at national levels. It is acknowledged that this will strain resources and potentially require an increase in headcount. Given that discussions and decisions made at these levels can have a profound effect on ICANN and the Multistakeholder Model, there is little choice but to accept the risk that this could result in continuous work not previously anticipated.</p>	See 4.4.9

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AT-LARGE ADVISORY COMMITTEE	<p>Global Domain Division (GDD) Accounts and Services</p> <p>Adequate and stable support for this activity, in particular in preparation for the next round of New gTLDs, is necessary so that the current and baseline operations supporting the last round of new gTLDs are not compromised.</p>	See 4.4.5
AT-LARGE ADVISORY COMMITTEE	<p>Global Communications and Language Services</p> <p>The ALAC and At-Large Community are long-term supporters and beneficiaries of ICANN's provision of language services and the skills and expertise of global communications. In recent times, our regular use of real-time transcription (RTT) and other forms of captioning has become an indispensable tool during our meetings and online activities such as webinars, allowing attendees whose first language is not the one being primarily used in the activity, and/or who have limited connectivity or technology issues (bandwidth, connection stability, etc.,) or who have a disability to maintain communications and participation.</p> <p>We greatly appreciate the work of Language Services and having RTT incorporated in the core budget for At-Large Meetings as this has resulted in a significant increase in attendance on our calls and meetings. As opposed to the automated/machine captioning on Zoom, RTT is available on a separate stream text link, which is the preferred mode for persons with disabilities, persons with low bandwidth, and persons whose first language is not English. Our survey data has shown that over 90% of all users have said that RTT on calls has allowed them to participate better. Human Captioning/RTT enables them to listen and then to read and re-read what has been said, to get a better understanding of what is being said. This not only increases their engagement but also their ability to participate in the topics, and consequently, increasing their understanding of the topics being discussed. RTT in general advances ICANN's goals of developing a globally diverse culture of knowledge participants and also enhances inclusivity, transparency and accountability which are critical tools to being trusted by its stakeholders. In our original pilot project we had RTT in English, Spanish, and French and the pilot worked well. However, once RTT became part of the core budget ICANN only provided this in English stating that they were unable to provide the other languages on a daily or weekly basis. We found that odd as we had no issues with the vendor who operated our pilot project.</p>	See 4.4.6

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AT-LARGE ADVISORY COMMITTEE	<p>Ombuds Office</p> <p>We noted the statement regarding the Ombuds Office, “Work Stream 2 of the Cross-Community Working Group on Enhancing ICANN Accountability issued recommendations that have been accepted by the Board. The accepted recommendations include wording relating to the Office of the Ombuds. The Office of the Ombuds supports and contributes to the implementation of Ombuds-related recommendations” and believe that the final implementation must include (before any selection of a new ICANN Ombuds Office (IOO)) the recommendation already accepted by the ICANN Board: 5.8 (Implementation Guidance). All the other recommendations to be finalized or already implemented with the previous IOO must also be taken into consideration. Therefore an “Operation Initiative contributions” must be set up for that purpose.</p>	See 4.4.12
AT-LARGE ADVISORY COMMITTEE	<p>ICANN FY25 Budget</p> <p>We appreciate the Budget breakdown by activity, especially within each activity; this eases understanding where funds are allocated.</p>	
AT-LARGE ADVISORY COMMITTEE	<p>ICANN FY25 Budget</p> <p>Our concern is with the actual budgeted cost of handling two funds, the Supplemental Fund for Implementation of Community Recommendations (SFICR) and the ICANN Grant Program. In the SFICR, the cost of handling is about USD 2 million. However, the only function budgeted is to allocate 75% of the fund to the New gTLD program, with no comment for the remaining amount. Additionally, it is unclear whether this fund will be replenished once the New gTLD round is in place and generates money. Although the fund is much larger for the ICANN Grant Program, only USD 10 million is expected to be allocated in FY25. However, handling it costs about USD 2 million, or 20% of the expected allocation. From the average full-time employees (FTEs) and the Program to Date and Projected Next Round Financials through the FY25 table, there is an estimated 46 FTE for FY25 and a cost of around USD 47.7 million (April 2023 – June 2025). We note that the Financials only include the projected costs. Is there any projected revenue or income estimated for the next round?</p>	See 4.5.6

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AT-LARGE ADVISORY COMMITTEE	<p>IANA FY25 Budget</p> <p>From the perspective of the ALAC and the ICANN At-Large Community, we appreciate that inflation is being considered this year in the FY25 IANA budget. We also highly appreciate the decrease in Professional Services and the increase in full-time equivalent personnel since these are core functions in ICANN and should be carried out by ICANN org staff.</p>	See Section 5
AT-LARGE ADVISORY COMMITTEE	<p>Additional Budget Request</p> <p>The purpose of the At-Large Leadership Strategic Meeting is twofold: 1) to allow a dedicated time for the At-Large Leadership, develop strategic At-Large priorities for the upcoming year. The meeting attendees would consist of the 15 ALAC members, ALAC Liaisons (ccNSO, GAC, GNSO, SSAC), and 10 RALO leaders to as well as the 6 Chairs of the three Working Groups: Cross Community Work Group (CPWG), Operations, Finance and Budget (OFB), and the Outreach and Engagement (OE), and 2) to facilitate the onboarding process for incoming leaders as well as the integration of the continuing leaders thereby creating a basis for a strong and united At-Large leadership team. The scope of the At-Large Leadership Strategic Meeting would include a one- day face-to-face meeting either the day before the start of the ICANN Annual General Meeting (AGM) or the day following the close of the AGM to allow the leadership team to develop strategic priorities and the process for their implementation. Meeting face-to-face would also allow the At-Large leadership to begin their team-building, engage in training, and provide onboarding activities for incoming leaders. Alignment of the proposed activity with the ICANN Mission, the ICANN Strategic Plan for fiscal years 2021-2025, the At-Large top 3 FY25 ICANN Operating Plan and Budget priorities, and the FY25 At-Large strategic priority activities.</p> <p>The request for the At-Large Leadership Strategic Meeting incorporates as many efficiencies as possible. Given that the activity will take place either a day prior to, or after, the AGM, the requested logistics include a meeting room, accommodation in a hotel connected to the ICANN Public meeting, one day’s per diem, and catering are required. Travel costs will not be required as At-Large leaders are already funded to the AGM. This will also save time on behalf of the At-Large leaders as no additional travel time is needed.</p>	See 4.5.9

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
AT-LARGE ADVISORY COMMITTEE	<p>Additional Budget Request 2: Global End User Survey PURPOSE AND SCOPE OF THE PROPOSED ACTIVITY The purpose of the Global End User Survey is to identify end user concerns and to facilitate priorities. As it endeavors to represent the interests of individual end users, the At-Large community employs a number of different tools to assess those interests including discussions, regional feedback, community surveys and outreach. However, it would behooves the At-Large community to go to the end users themselves, on a periodic basis, to assess the level of concern and stakes on a variety of issues related to the DNS. These topics would include DNS Abuse, Universal Acceptance, Geographic Names, representation in the industry and much more.</p> <p>Ideally, such a global end user survey would coincide with the fourth At-Large Summit (ATLAS IV) and help the community to establish positions and priorities for the coming years. Such a survey would be a random survey, conducted by an outside firm, not the self-selected surveys, in regular use.</p> <p>ESTIMATED FUNDS REQUESTED- To be discussed with ICANN org.</p>	See 4.5.9
ccNSO SOPC	<p>The ccNSO SOPC notes that the document format is consistent with last year's format and no major differences with last year's documents. Although the CEO Goals are mentioned throughout the document – the status of which is unclear to us in relation to the Strategic and other Plans and the community priority is unclear to us - they appear to be consistent with overall long- term plans and provide a useful emphasis for FY25 activities.</p>	See 4.1
ccNSO SOPC	<p>Risks and Dependencies With respect to the identified risks and dependencies affecting the proposed activities, including to what extent progress is dependent on community contributions (specifically ccTLD related persons), the risk overall assessment for each Operating Initiative and Functional area appear to be adequate. Where considered needed specific comments are provided.</p>	See 4.2.1

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>KPIs</p> <p>The ccNSO SOPC wants to reiterate our comment on the FY23 Plans. The ccNSO SOPC believes ICANN and the community should jointly review the current non-transactional metrics and KPIs to assess whether they measure what they are supposed to measure. As stated in 2022, for example actual progress on achieving milestones or sub-goal against the stated goal of a project in which the community is involved is of relevance from a community perspective. In its response on this suggestion ICANN indicated it would engage with the community in FY23 to identify potential improvements. To date the ccNSO SOPC has not seen any follow-up on this commitment, and would like to understand, whether we can expect such a follow-up and if so, when, how etc. In our view, reporting to the community only adds value when there is a mutual understanding on what is reported upon.</p>	See 4.2.4
ccNSO SOPC	<p>Reporting</p> <p>Related to the recurring comments on KPI's, we reiterate our comments with respect to reporting of progress in achieving goals and objectives contained in the operating plans. The ccNSO SOPC notes that in response to previous comments on progress reporting ICANN referred to the CEO's quarterly reports to the Board. The ccNSO SOPC points out that the latest publicly available version relates to the period December 2022- March 2023. Further, the ccNSO SOPC believes that although the CEO reports do provide a wealth of information on activities and achievements of the various ICANN functions, there is no direct relation with the objectives and goals in the annual and five-year operating plans, nor is progress reported against projected milestones or sub-goals included in the planning (in part due to the lack of relevant KPIs).</p>	See 4.2.4
ccNSO SOPC	<p>Reporting</p> <p>ICANN indicates that internally progress is tracked against all of its Operating Initiatives and Functional Activities. The ccNSO SOPC would appreciate an indication whether these data points are publicly available, for example included in the CEO's quarterly reports, or reported in a different manner? In addition, if the data is only shared with the ICANN Board or one of its committees, does the latter provide any public assessments beyond Q&A sessions at the ICANN meetings?</p>	See 4.2.4

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>Activity Based Reporting The ccNSO SOPC welcomes and appreciates introducing “Activity Based Reporting” as it provides additional depth in understanding the proportion of resources allocated to each activity, but requests to maintain the “traditional View” in future relevant material to allow comparison.</p>	See 4.5.1
ccNSO SOPC	<p>ccNSO Policies implementation In the comments on ICANN’s Draft FY24–28 Operating & Financial Plan and Draft FY24 Operating Plan & Budget ccNSO SOPC raised an issue on support for the implementation of ccNSO policy recommendations. ICANN responded that this support may be provided by a variety of functions across the organization, depending on the subject matter. ccNSO SOPC failed to see any mention of implementation of ccNSO policy recommendations In draft Draft ICANN FY25-29 Operating & Financial Plan and Draft ICANN FY25 Operating Plan and Draft IANA FY25 Operating Plan and Budget. Therefore we suggest ICANN to carefully review ongoing policy development processes that are completed or close to completion and to include the activities to implement such policies in the FY25 Operating Plan. ccNSO SOPC expects to see completion of ccNSO PDP3 Retirement Policy recommendations approved by ICANN Board on September, 22 2022 (if not completed earlier), implementation of ccNSO PDP 3 Review Mechanism Policy (submitted for Board approval) and ccNSO PDP4 IDN recommendation (to be completed in 2024 calendar year).</p>	See 4.4.13
ccNSO SOPC	<p>Support the evolution and strengthening of root zone management The ccNSO SOPC believes that there is a general consensus that the evolution and strengthening of root zone management is at the core of ICANN’s mission and part of the raison-d’etre of ICANN. Given the criticality of these operating initiatives the ccNSO SOPC was surprised to find the following in the planning documents: “The greatest risk is the possible loss of development resources that are prioritized to other objectives.” The ccNSO SOPC would like to understand what kind of other objectives might crowd out important root-zone related development work and which other objectives are considered of a higher priority. In this context we like to draw your attention to our comment with respect to the PTI budget i.e the need to ensure that adequate funding and resources are available and allocated to PTI.</p>	See 4.3.7

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>According to the draft plans the purpose of the operating initiative Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking is to ensure that participation in the policy development work of ICANN's three Supporting Organizations (SOs) and advice developed by the four Advisory Committees (ACs) is globally representative. However, the ccNSO SOPC notes that in its view the scope of this initiative tends to describe existing processes rather than efforts to increase global representation.</p>	See 4.3.2
ccNSO SOPC	<p>Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking The observation in the plan that resources “are likely to be needed to support improved or new virtual collaboration tools and more face-to-face or intersessional meetings to advance or complete major policy projects and allow for globally representative participation” is supported by the ccNSO SOPC. However, it is not clear whether additional resources are provided to achieve the purpose, given the “stable funding” from FY24 to FY25.</p>	See 4.3.2
ccNSO SOPC	<p>Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking It is also not clear to the ccNSO SOPC how the goal of this initiative is intended to be achieved. The added value of providing improved or new collaboration tools to the same group of people, or more face-to-face or intersessional meetings to an existing group of volunteers, who already risk burnout is not clear to the ccNSO SOPC. Therefore, the ccNSO SOPC would like to understand the actual activities under this initiative and resources available to evolve and strengthen the multistakeholder model, also taking into account the clearly identified risk of volunteer burnout.</p>	See 4.3.2
ccNSO SOPC	<p>Evolve and Strengthen the ICANN Community's Decision-Making Processes to Ensure Efficient and Effective Policymaking Resources are identified as stable with possible increase in travel and system migration expenditure. Risks around prioritization and complexity are clearly identified. The interest of the ccNSO in increased cross-community and diverse stakeholder engagement would suggest increased funding will be needed under this initiative to achieve ambitions in this area.</p>	See 4.3.1

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>Promote and evolve the DNS through open and transparent processes that enable competition and open entry in Internet-related markets while ensuring the stability, security, and resiliency of the DNS.</p> <p>The ccNSO SOPC notes that the draft plan does not consider the ccNSO and its work in this area through the recently created ccNSO universal acceptance committee (UAC).</p>	See 4.3.6
ccNSO SOPC	<p>Promote and evolve the DNS through open and transparent processes that enable competition and open entry in Internet-related markets while ensuring the stability, security, and resiliency of the DNS.</p> <p>Further, the ccNSO SOPC after consulting the ccNSO UAC notes that the envisioned scope of promotion is limited. It does not include the following items:</p> <ul style="list-style-type: none"> ● UA readiness have to be adopted also for devices that process domain names and email addresses (like the multi-function machine that scan document and send the scanned copy to email address) ● It does not consider the tools for DNS management, Anti-Spam tools, email affiliated programs like address book manager or meeting manager. ● The role of Governments is not considered although they could play an important role for UA adoption policies. For example, governments could be encouraged to make UA mandatory for any application, device and systems through their procurement processes. ● Any system that has a communication with ICANN UA-Ready systems should be UA- Ready as well so we have a consistent environment as a return. (Like travel support portal) 	See 4.3.6
ccNSO SOPC	<p>Geopolitical monitoring, Engagement Mitigation</p> <p>The ccNSO SOPC notes that with exception of the reference to work with the GAC, other efforts to effectively leverage and assist in building the narrative in the engagement process are not reflected under this initiative.</p>	See 4.3.3

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>Geopolitical monitoring, Engagement Mitigation</p> <p>The ccNSO has identified in its comment last year a broader need for ICANN to also engage with ccTLD Managers, their regional organizations and committees such as the ccNSO Internet Governance Liaison Committee (IGLC), given their proximity to national governments and the ccNSO's global membership (from 174 countries and territories). The ccNSO SOPC notes that in last year's response to these comments, this concern was not addressed either in the planning or in the responses. The ccNSO SOPC notes that this concern is again not reflected in the Initiative. In this context the ccNSO SOPC wants to reiterate its comments from last year that it is not clear whether sufficient resources will be provided to expand the scope of activities under this initiative to include outreach to and engage ccTLD managers and regional organizations in the area of activities. Adequate resourcing becomes even more pressing given the tight timeframes and the clear identification of lack of adequate resourcing as a risk factor.</p>	See 4.3.3
ccNSO SOPC	<p>Improve the Depth of Understanding of the Domain Name Market Drivers That Impact ICANN's Funding (completed)</p> <p>The ccNSO SOPC notes that the milestones have been reached to improve the depth of understanding of the domain name marketplace drivers that impact ICANN's funding. The ccNSO SOPC supports the transition of this initiative into an ongoing functional activity.</p>	See 4.3.8
ccNSO SOPC	<p>Improve the Depth of Understanding of the Domain Name Market Drivers That Impact ICANN's Funding (completed)</p> <p>ccNSO SOPC appreciates the acknowledged lack of clarity on how the evolution of the market and wider threats may impact the ICANN funding model, it also believes that the process itself to understand the evolution of the market and related matters, should be considered part of the ongoing and recurring business activities.</p>	See 4.3.8
ccNSO SOPC	<p>Improve the Depth of Understanding of the Domain Name Market Drivers That Impact ICANN's Funding (completed)</p> <p>ccNSO SOPC suggests defining, measuring and reporting appropriate KPIs for such ongoing functional activity. Specifically, greater transparency as to how ICANN will continue to expand its understanding and knowledge of the potential threats to the funding model would be welcomed. The ccNSO SOPC would also seek assurance that data sets to support forecasting processes will be shared with the community and input will be sought to further enhance and validate these data sets.</p>	See 4.3.8

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>Implement New gTLD auction proceeds recommendations as approved by the Board.</p> <p>The ccNSO SOPC welcomes that the Grant Program has been launched and considers it is a testament of ICANN's maturity.</p>	See 4.3.5
ccNSO SOPC	<p>Planning at ICANN</p> <p>The ccNSO SOPC notes that whilst milestones are mentioned, specific KPIs are not always detailed. The plan introduces enhancements, but the details on specific actions are not explicitly outlined.</p>	See 4.3.9
ccNSO SOPC	<p>Planning at ICANN</p> <p>The ccNSO SOPC welcomes and supports the Planning Prioritization Process, which serves its purpose. The ccNSO SOPC is committed to stay involved.</p>	See 4.3.9
ccNSO SOPC	<p>Planning at ICANN</p> <p>With respect to progress reporting, we note that in response to previous comments on progress reporting ICANN referred to the CEO's quarterly reports to the Board. The ccNSO SOPC wants to point out that the latest publicly available version relates to the period December 2022- March 2023. Further, the ccNSO SOPC believes that although the CEO reports do provide a wealth of information on activities and achievements of the various ICANN functions, a direct relation with the annual and five year operating plan is not directly clear, nor is progress against the planning (in part due to the lack of relevant KPI's).</p>	See 4.4.15
ccNSO SOPC	<p>ICANN Reserves (Completed)</p> <p>First, the ccNSO SOPC commends ICANN on its efforts to safeguard ICANN's long-term financial sustainability and agrees that this Operating Initiative is successfully completed. In the past the ccNSO SOPC stressed the importance of maintaining a solid reserve to finance its operations.</p>	See 4.3.4
ccNSO SOPC	<p>ICANN Reserves (Completed)</p> <p>Noting that the reserves fund is at a level above "an amount equal to one year of operating expenses as the minimum target level" the ccNSO SOPC welcomes additional discussion and consideration of an "appropriate" rather than "minimum" level of the Reserve Fund to avoid excessive reserves when funds might be better spent on other activities, and is available to engage in such a discussion with ICANN.</p>	See 4.3.4

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>Technical & DNS Security Services Group, IANA Functions The ccNSO SOPC notes that from a ccTLD perspective the functional activities in the area of Technical & DNS Security Services Group, IANA Functions are critical and continuity and an adequate level of the services provided in this area needs to be guaranteed. Therefore the ccNSO SOPC urges ICANN to ensure IANA is adequately resourced and when needed additional resources are provided to IANA. IANA needs to be in a position to deliver on additional anticipated activities such as implementation of new policies and implementing potential updates to IANA Function service level agreements.</p>	See 4.4.11
ccNSO SOPC	<p>Technical & DNS Security Services Group, IANA Functions In addition, the ccNSO SOPC expresses its concern that specifically with respect to the IANA function, losing staff may significantly impact this core function. Most roles in the team lack redundancy and filling positions when staff depart has often proved challenging. The ccNSO SOPC urges ICANN to ensure redundancy in skills among staff, also in light of the upcoming round of new gTLDs.</p>	See 4.4.11
ccNSO SOPC	<p>Strategic Initiatives Functional Activity The ccNSO SOPC notes that it includes the support of work undertaken by the community, such as the coordination of ICANN's strategy as it relates to compliance with the European Union's General Data Protection Regulation (GDPR) and other global data protection and privacy legislation; mitigating DNS security threats; special projects related to the New gTLD Program: Next Round, IDNs, and UA-related topics. The ccNSO SOPC notes that the focus seems to be on gTLDs and more technical topics.</p>	See 4.4.16
ccNSO SOPC	<p>Constituent and Stakeholder Travel Functional Activity The ccNSO SOPC notes the plan reflects a business as usual approach. The ccNSO SOPC believes that this does not align well with operating initiatives to increase diversity and broaden the base of multi stakeholders actively participating. The ccNSO SOPC would welcome initiatives in this area to initiate a conversation if and how travel funding could strengthen the aforementioned operating initiatives.</p>	See 4.4.1

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>Global Stakeholder Engagement Functional Activity</p> <p>The ccNSO SOPC notes that the manner in which the activities are described lean towards an approach of “engagement for the sake of engagement”. The objectives and underlying operational goals and milestones of the engagement efforts are not clear. The ccNSO SOPC believes that the intent of the activities in this area is to promote and leverage its unique role that is not reflected in this functional area.</p>	See 4.4.8
ccNSO SOPC	<p>Global Stakeholder Engagement Functional Activity</p> <p>The ccNSO SOPC notes there is no reflection on the engagement activities with ccTLD managers and related organizations. In line with last year’s comments the ccNSO SOPC believes that closer cooperation between ICANN and the ccNSO Internet Governance Liaison Committee, relevant working groups of the Regional ccTLD organizations, and when and where needed individual ccTLD Managers will be beneficial to the goals of the activities in this area.</p>	See 4.4.8
ccNSO SOPC	<p>Global Stakeholder Engagement Functional Activity</p> <p>The ccNSO SOPC notes again that most initiatives and activities are very focused towards gTLD and hardly refer to ccTLDs. Given the increased needs for engagement the ccNSO SOPC believes it is unlikely that stable funding will be sufficient to meet these needs.</p>	See 4.4.8
ccNSO SOPC	<p>Regional Offices Functional Activity</p> <p>The ccNSO SOPC believes that individual ccTLD managers could contribute effectively to engagement with local and regional stakeholders but this is not reflected, nor is partnership considered in the activities as described.</p>	See 4.4.8
ccNSO SOPC	<p>Engagement Programs Functional Activity</p> <p>As an illustration of how the ccNSO and/or individual ccTLD managers could support activities in this area, the ccNSO SOPC would like to refer to the a ccNSO session during ICANN78 on Corporate Social Responsibility. This session is directly related to environmental and other areas of sustainability. The ccNSO SOPC notes that although ICANN's environmental sustainability strategy project is part of ICANN Interim President and CEO Goals (Goal 8 for FY24) and reflected in the FY25 engagement programs, no reference to engagement or partnerships with ccNSO or ccTLD managers is made in this area, nor an effort to learn from ccTLD Managers in this or other areas.</p>	See 4.4.3

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>Governmental and Intergovernmental Organization Engagement Functional Activity</p> <p>It is the understanding of the ccNSO SOPC that ICANN's Global Engagement team is responsible for outreach and engagement with national and regional governments and IGOs to inform the stakeholders of ICANN's mission and mandate of ICANN. The team acts as a central point of contact within ICANN to help governments and IGOs understand and be mindful of the way the Internet functions and the role ICANN plays in technical Internet governance.” In line with last year’s comment (FY24 ccNSO SOPC submission) the ccNSO SOPC believes there is a need to reflect on these engagement efforts, including on when and how individual ccTLD managers should/could be part of these efforts to build and support effective global engagement activities with local governments and IGOs. In last year’s comments the ccNSO SOPC already noted this will to a large extent avoid counter-productive engagement efforts. As stated above, the ccNSO SOPC believes that adequate resourcing in this area is needed, for example to execute ICANN's WSIS +20 agenda.</p>	See 4.4.9
ccNSO SOPC	<p>Global Communications and Language Services Functional Activity</p> <p>The ccNSO SOPC is keen to support broader and enhanced participation in ccNSO and ICANN by a more diverse (making meaning for “multi” in multistakeholder) and well supported “new to ICANN” ccTLD managers. This was a topic discussed that emerged recently in various sessions on how the ccNSO remains to be relevant for the next few years. One of the outcomes of that discussion was that language support is needed to ensure productive and effective participation of new participants in ICANN. The ccNSO SOPC suggests continuing adequate support in this realm, including live interpretation and transliteration at ccNSO meetings, including Tech day.</p>	See 4.4.6
ccNSO SOPC	<p>Planning Functional Activity</p> <p>The ccNSO SOPC notes that in this year’s planning there is a stronger emphasis on timely reporting and metrics for plan and strategic plan progress compared with the previous one. We appreciate this approach, however we do want to note that this has been committed to in the past, but to date we have not seen great progress in this area.</p>	See 4.4.15

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>Planning Functional Activity The ccNSO SOPC notes that the budget for Planning Functional Activity increases vs FY24. Two more Full Time Equivalents (FTEs) lead to 0.4 million USD increasing. Our interpretation is that each FTE leads to 200 thousand USD per year. ccNSO SOPC would appreciate the explanation of the reason to employ two more FTE.</p>	See 4.4.15
ccNSO SOPC	<p>Finance and Procurement Functional Activity The ccNSO SOPC notes that this function now has additional roles: to support 'Implement New gTLD auction proceeds recommendations' and 'Financial analysis specific to the New gTLD Program: Next Round'. The ccNSO SOPC considers this to be appropriate.</p>	See 4.4.4
ccNSO SOPC	<p>Finance and Procurement Functional Activity The ccNSO SOPC notes that although in this section the Objectives are defined, the underlying targets and/or milestones necessary to measure progress towards achieving the objectives are not adequately defined. The ccNSO SOPC further seeks clarity as to where and when efficiencies and process improvements are reported to the community and how the community will know financial analysis is improving.</p>	See 4.4.4
ccNSO SOPC	<p>Funding ccNSO SOPC supports the use of the "base" scenario and therefore a conservative approach for the FY25 budget. The assumption about the growth-rate in the "base-scenario" is consistent with growth-rates members of the ccNSO SOPC observe.</p>	See 4.5.2
ccNSO SOPC	<p>Activity Based Reporting The ccNSO SOPC welcomes and appreciates introducing "Activity Based Reporting" as it provides additional depth in understanding the proportion of resources allocated to each activity but requests to maintain the "Traditional View" in future relevant material as well to allow comparison.</p>	See 4.5.1
ccNSO SOPC	<p>Activity Based Reporting It is our understanding that the Draft Budget (by its very nature) provides planned expenses allocated by activity. We see even more value in seeing actual figures for both FY24 and FY25 reported in the same manner (by activity). Further, we wonder whether the activity- based reporting is based on any method of activity- based costing and/or ICANN will be moving in that direction?</p>	See 4.5.1
ccNSO SOPC	<p>Grant Program As stated before, the ccNSO SOPC welcomes that the Grant Program has been launched and considers it is a testament of ICANN's maturity. In</p>	See 4.5.5

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
	<p>its comments to FY24 Draft Budget ccNSO SOPC expressed concern regarding the costs of executing the Grant Program which was planned to be 4 million USD or 40% of the amount of the Projected Grants Distributed (10 million USD) not including the Technical and DNS Security service area. ccNSO SOPC notes that actual FY24 forecasts predict these costs as 2 million USD and Draft FY25 Budget includes another 2 million USD. The ccNSO SOPC would like to understand if ICANN considers ways to improve the ratio, either by increasing the annual level of grants, making the process more efficient or a combination.</p>	
ccNSO SOPC	<p>Reserve Fund The ccNSO SOPC notes that the Reserve Fund is invested according to a conservative Investment Policy and commends ICANN on its transparency with respect to its investment strategy. ccNSO SOPC notes that the Reserve Fund will grow with approximately 2 million USD due to Investment income in FY 25 and the growth was higher in previous years (an average of about four percent per fiscal year during the last 5 years). The ccNSO SOPC wonders whether the income from investment will offset the expected inflation, and - if not – whether ICANN would consider adjusting Investment Policy or making additional donations to the Reserve Fund.</p>	See 4.3.4
ccNSO SOPC	<p>Funds and transfers <i>Section 9.3.1 Total ICANN FY24 Forecast (page 47) shows the Board-Approved Transfers: Operating Fund Excess to SFICR 20 millions USD, SFICR to to fund Next Round until June 2024 – 13 million.</i> In the Financial Overview section (page 7-8, new gTLD Program) it is explained that \$26 millions expenses are related to Next Round implementation, out of this 26 million \$18 million will be transferred from the SFICR, the rest \$8 million will be covered by the New gTLD Fund. In practical terms this implies that for the upcoming year the next new gTLD Round implementation work is mostly funded from the Operating Fund Excess (via SFICR) and minor part of funding comes from New gTLD Fund. Given the earmarking and specificity of the SFICR Fund, the ccNSO SOPC expresses a concern that using a large portion of this Fund for next new gTLD round purposes crowds out other activities pertaining to other initiatives in which the whole community participated.</p>	See 4.5.6

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
ccNSO SOPC	<p>FY25 Budget versus FY24 Forecast</p> <p>The ccNSO SOPC believes there is a discrepancy that we believe may need to be cleared up in the FY25 budget: The travel/meeting cost forecast drops from \$17M for FY24 to \$13M for FY25 (section 4.1, page 12)).</p> <p>That should be a ‘favorable’ change of \$4M in FY25. But the “Favorable/(Unfavorable) vs. FY24 Forecast” column shows a ‘favorable’ change of only \$3M. So that should be changed to \$4M or the numbers for Travel & Meetings for FY24 and/or FY25 need to be adjusted. We would appreciate understanding if this might be due to rounding the figures or due to another factor.</p>	See 4.5.1
ccNSO SOPC	<p>For the record we mention the corrections that were mentioned in ccNSO SOPC Clarifying Questions and acknowledged by the Planning team . It is our understanding that they will be reflected in the next published version:</p> <ul style="list-style-type: none"> • (page24) Needs to modify "GDD Summit" on 4.4.4 "Constituent Travel"(page 24) to "CPH Summit". • (page25) Needs to modify "ICANN 80 -TBD" on page 25 to "ICANN 80 Kigali". 	See 4.1
ccNSO SOPC	<p>ABR related comment</p> <p>In 2023 ICANN suggested eliminating the Additional Budget Request (ABR) process and advised to submit ABRs as a part of Public Comment. This suggestion aimed to simplify the overall budget process. The ccNSO Council supported the simplification of the ABR process, but requested ICANN to provide a template to use for submitting ABR. In reviewing the public comment documentation the ccNSO SOPC did not find such a template. In order to avoid confusion between comments on the planning documents and specific budget requests the ccNSO SOPC asks ICANN to provide a template to request specific budget. In addition, the ccNSO SOPC would appreciate to understand whether there is an envelope in the Draft Budget reserved to cover the ABRs and – if not – how and to what extent the additional budget requests will be funded.</p>	See 4.5.9
ccNSO SOPC	<p>Metrics and Nomcom</p> <p>A positive example with respect to development of metrics relates to the support function of the NomCom. It is the understanding of the ccNSO SOPC that the metrics include such items as the number of applications, the diversity of applications, an assessment of whether the criteria have been met in full (at an organizational not individual level), the timeliness and quality of the process. The report from NomCom is a starting point in developing and reporting on suitable metrics.</p>	See 4.2.4

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
Individual - Ruben Diaz Silva	<p>I propose to include a twelfth strategic initiative in the Plan: 12. Intensively disseminated within academic circles, social organizations, the sphere of international organizations, activists of all kinds, business chambers, professional associations, the delicate mission of ICANN, and the ever-evolving governance system. One way to operationalize this strategy is for ICANN, by making some space in its agenda, to convene necessary discussions in the world of technology where governance systems for critical infrastructure/strategic technology are required. Specifically, a discussion should be initiated so that other stakeholder groups can apply ICANN's participatory architecture in the scope and ethics of Artificial Intelligence, Consolidation of a universal electronic payment protocol/global electronic payment system, CRISPR Ethics, Universalization of access to SPACE resources, etc</p> <p>Even though these are not subjects within the scope of ICANN's work, they are areas where the participatory architecture, and the flawless governance mechanism of ICANN, can serve as an important reference for establishing similar governance mechanisms in other fields</p> <p>Supporting other areas of human technology in the consolidation of institutional architectures that ensure open and transparent governance is not ICANN's mission (although it might be part of its duties in the future), discussing this governance architecture as a potential solution for numerous new and radical technologies (as the Internet once was, and still is) will provide us with extensive exposure.</p>	See 4.3.10
Individual - Kossi Amessinou	<p>For the grant program. It is important to support more women and provide capacity building for them. The women who don't have English as their first language must be helped seriously. Marginalized women coming from developing countries should be helped because they are victims of many discrimination such as gender discrimination and also language barrier. NGO Women Be Free calls for the promotion of women in technology and the digital ecosystem now. Technology and digital can provide more change in their daily challenge. Capacity building is important for them. Grant program can take this remark into consideration.</p>	See 4.4.10
GAC	<p>The GAC thanks the ICANN org Finance Team for continuing to evolve and improve the detail and scope of information provided to the community in the draft operating plan and budget materials. Over the past few years, the GAC Leadership has observed ongoing improvements to the format and detail of the extensive materials made available for community review.</p>	See 4.1

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
GAC	<p>The GAC is pleased to acknowledge the apparent careful coordination within and between both the <i>Draft ICANN FY25–29 Operating and Financial Plan</i> (hereinafter Draft FY25-29 O&FP - https://www.icann.org/en/system/files/files/draft-op-financial-fy25-29-opplan-fy25-2023-en.pdf) and the <i>Draft ICANN FY25 Operating Plan and Budget</i> (hereinafter Draft FY25 Budget - https://www.icann.org/en/system/files/files/draft-budget-fy25-2023-en.pdf).</p> <p>The draft documentation allows readers to see how the organization’s strategic and operating initiatives are addressed over the course of both one-year and five-year operating plan periods. This coordination is important in providing assurances to governments that particular areas of GAC interest are preserved as important organizational operational priorities that will be adequately resourced over the next five years – particularly as work is underway for development of the next 5-year strategic plan.</p>	See 4.1
GAC	<p>Additional Budget Request Process Discontinued</p> <p>As confirmed by the ICANN staff response to a community clarifying question (see Draft FY25 Clarifying Questions and Responses – 29 January 2024), “the Additional Budget Request process has come to an end for this current planning cycle, [and] ICANN encourages community groups to use the annual Operating Plan and Budget process ... for all resource requests going forward.” The GAC notes the ICANN staff’s belief that “[s]trengthening resource requests from the ICANN community into a single process is expected to result in more efficiencies,” and will monitor this revised approach to evaluate that expected success. As a consequence of this process change, this document identifies particular resource requests that the GAC would otherwise present in the ABR phase of the planning process.</p>	See 4.5.9
GAC	<p>Community Engagement and Services</p> <p>In describing functional activities involving community engagement and service, the Draft FY25- 29 O&FP continues to recognize the need for increased resources to address “stakeholder[s] demand for engagement and capacity development through the GAC’s Underserved Regions Working Group and Public Safety Working Group” (see Draft FY25-29 O&FP at page 80).</p> <p>The GAC is pleased to see that those workshops are adequately resourced in the core organizational budget during FY25 (see Draft FY25-29 O&FP at page 24). The GAC expects to be GAC Comments Regarding Draft FY25-29 Operating & Financial Plan and Draft FY25 Operating Plan & Budget – 12 February 2024 able to use the available</p>	See 4.4.8

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
	engagement resources to plan and implement intersessional activities and face-to-face workshops in conjunction with ICANN public meetings during FY25.	
GAC	<p>Constituency Travel</p> <p>The GAC appreciates the resource commitment in the Draft FY25 Budget to maintain constituency travel support at the current budget levels. The GAC expects that in future budget years it may be needed to increase community travel support to encourage in-person attendance at ICANN public events - particularly given renewed emphasis by the committee to promote face-to-face engagement among government representatives to the GAC. The GAC appreciates that the resources devoted to GAC travel in FY25 will offer flexibility for the committee leadership to organize strategic discussions and other activities that are important for committee planning and organizational efforts.</p>	See 4.4.1
GAC	<p>Operating Initiatives</p> <p>GAC members generally support the 11 ICANN Operating Initiatives as described in the draft documentation (see Draft FY25-29 O&FP at page 13, 126 and 129) – particularly the initiative regarding “geopolitical monitoring, engagement, and mitigation” (see id. at pages 28-30 and 145-148). It is noted that this important operating initiative continues to be a key consideration across a number of the ICANN organization’s functional activities in both the five-year and one year time frames including in Government and Intergovernmental Engagement (id. at pages 78, 80 and 198), Policy Development and Implementation Support (id. at 181), and Community Engagement and Services (id. at 188).</p>	See 4.3.3
GAC	<p>Operating Initiatives</p> <p>Governmental regulatory attention related to Internet issues has become one of the key factors impacting the current Internet ecosystem, and in particular ICANN, in recent years. Noting that ICANN is committing resources in each of the mentioned functional activities above, the GAC reaffirms its commitment to ICANN’s mission to ensure the stable and secure operation of the DNS.</p>	See 4.3.3
GAC	<p>Operational Tools and Resources</p> <p>As the expectations for contributions from community groups to both policy and operational aspects of the ICANN mission continue to expand, the GAC and other community groups find that organizational effectiveness and efficiencies become more and more necessary to help the community “work smarter” to address growing demands for their input.</p>	See 4.3.1

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
	<p>These expanding expectations are reinforced by the inexorable growth of ICANN staff resources (up to a total of 460 “average FTEs” by the end of FY25 (see Draft FY25 Budget at page 6). With past experience as a guide, it is evident that a highly competent and professional staff produces substantial workload demands on the community. GAC members believe that the organization and community leaders must explore additional project and system management tools at an enterprise level that could help groups maximize their policy and advice efforts.</p> <p>The GAC Chair and Vice chairs have been informally researching some of these tools and would like to see the overall strategic plan include intentions for improved community efficiencies with the expectation that ICANN technical staff collaborate with the community to explore potential policy management tools and share their assessments with the community.</p>	
GAC	<p>Increased Accessibility to ICANN’s Work</p> <p>As part of the final Additional Budget Request (ABR) process during the FY24 planning period (see https://community.icann.org/display/projfinadhocws/FY24+Additional+Budget+Request+%28ABR%29+Process), resources were authorized for the ICANN organization to conduct initial testing and feasibility analysis of a potential sign language interpretation service pilot during ICANN Public Meetings. The ABR report released at the conclusion of the FY24 budgeting effort clearly stated the principle that ICANN, “welcomed the GAC proposal and is committed to inclusion of the deaf and hard of hearing communities during ICANN Public Meetings” (see ICANN Fiscal Year 2024 Additional Budget Request Process (April 2023) at pages 6-7).</p> <p>According to the ABR report, the estimated support authorized by the ICANN Board was intended to allow for a feasibility assessment and made the point that the grant did not include funding for an initial sign language pilot, if any (see id. at page 7). Consequently, it was recognized in the ABR report that due to the complex resource implications of providing sign language interpretation, ICANN would evaluate this approved exploratory phase as part of its further consideration of launching a pilot phase.</p> <p>ICANN committed that the ICANN Language Services Team would work with the ICANN Meeting Technical Services Team to consider the required resourcing, training, and testing for such a potential interpretation service and develop a feasibility assessment implementing a pilot effort for such a potential service (see id.).</p>	See 4.4.6

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
	<p>GAC Members expect ICANN to follow through on these commitments. The assessment effort is off to a slow start in FY24 and the GAC expects a commitment from ICANN in the FY25 Budget to ensure that further resources are provided at a commensurate level for this work to be initiated and continued productively (assuming a prompt start during the remaining time in FY24) in the next fiscal year.</p>	
GAC	<p>The GAC is grateful to ICANN org for this opportunity to share the committee’s perspective on the Draft ICANN FY25–29 Operating and Financial Plan and the Draft ICANN FY25 Operating Plan and Budget. The GAC looks forward to contributing to future comment opportunities as they relate to ICANN’s finances and other operations-related proceedings.</p>	See 4.1
Individual - Muhammad Shabbir	<p>There is no mention of making ICANN content, meetings, and/or processes accessible for people with disabilities in the five years plan. It’s crucial to ensure that ICANN’s operating and financial plan for the next five years incorporates accessibility measures and considers the needs of people with disabilities. While the plan aims to outline ICANN’s mission in the public interest, it must include specific strategies for making ICANN’s platforms, meetings, and information accessible to individuals with various disabilities. This includes providing alternative formats for materials, ensuring that online platforms are compatible with assistive technologies, and implementing inclusive practices in all aspects of ICANN’s operations. It must be noted that persons with disabilities are about 15 percent of the world population and form the world’s largest minority. By prioritizing accessibility, ICANN can truly serve the public interest and ensure that all voices, including those of people with disabilities, are heard and included in the internet governance process. The submission highlights a critical gap in the Draft ICANN FY25–29 Operating and Financial Plan regarding accessibility for people with disabilities. It emphasizes the importance of incorporating accessibility measures into ICANN’s operations over the next five years, including making content, meetings, and processes accessible to individuals with disabilities. By prioritizing accessibility, ICANN can better serve the public interest and ensure that all voices, including those of people with disabilities, are heard and included.</p>	See 4.1
Individual - Elvira Napwora	<p>The initiative to Evolve and Strengthen the Multistakeholder Model to Facilitate Diverse and Inclusive Participation in Policymaking is pivotal in light of the prevailing lack of awareness regarding ICANN’s delicate mission, mandate, and participation model. Efforts within this initiative should focus on delineating endeavors and policy projects aimed at augmenting global representation and participation. By doing so, ICANN</p>	See 4.3.2

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
	<p>can bolster the multistakeholder model, ensuring that participation in the policy development processes of its organizations is truly reflective of global diversity.</p> <p>While ICANN has historically played a significant role in technical Internet governance, it is imperative for its participatory initiatives to evolve alongside emerging technologies. As ICANN engages with the community to identify potential improvements, an exploration of how it can integrate itself more deeply into contemporary technological landscapes is warranted.</p>	
RySG	<p>Overarching comments</p> <p>Once again, and consistent with previous RySG comments, we invite ICANN to simplify its financial reporting.</p> <ul style="list-style-type: none"> ● The multitude of Operating Initiatives (11) and Functional Activities (34) – some of which appear to be redundant or at least overlapping – continue to make it difficult to assess where ICANN is focusing (or not) its resources. ● Relatedly, funding for these efforts appears to be divided across units within ICANN org making it extremely difficult to determine the full scope of investment in each initiative and their reasonability. 	See 4.1
RySG	As previously suggested, a zero-based accounting of all of ICANN's activities (rather than building a spending plan to match projected revenues) could help streamline the spending proposals.	See 4.5.1
RySG	In addition, the sheer volume of information and text in the report presents a challenge of finding time and human resources to thoroughly review, compare, and comment substantively.	See 4.1
RySG	<p>Given the recurring concerns about the complexity of ICANN's budget documentation and financial reporting, and in particular the accessibility of the massive and challenging amount of information to deal with from a community and volunteer perspective, and in particular community members with no training or background in finance, we pose the following questions:</p> <ol style="list-style-type: none"> 1. Does ICANN org have any plans to simplify its financial reporting? How might those plans improve community visibility into the transparency and accountability of ICANN's expenditures? 2. ICANN org indicates how progress is tracked internally against all of its Operating Initiatives and Functional Activities but is this data publicly available? If only shared with the ICANN Board's Finance 	See 4.5.1

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
	Committee, does the latter provide any public assessments beyond Q&A sessions at the numbered ICANN meetings?	
RySG	<p>3. Does ICANN org plan to show levels of activity over time? Importantly, are total dollars invested per item available so that the community can assess the reasonability of these investments?</p> <p>4. How will ICANN ensure that the Activity Based Reporting - as presented at the 23 December webinar - enhances financial reporting without adding complexity, but increases budget transparency and facilitates the assessment by its community? Is it ICANN's intention to replace the traditional expense category reporting with activity based reporting or will activity based reporting be supplemental to traditional reporting?</p>	See 4.5.1
RySG	<p>In the RySG's clarifying question submitted earlier in this public comment process, we noted that <i>"Many SOs/ACs rely upon the ABR to ensure and enable participation in ICANN's multistakeholder processes. What are the process, timelines, formalities and contact for ICANN community groups to submit resource requests as part of the OP&B process, as is suggested in the 8 November announcement?"</i> ICANN responded that in lieu of the traditional additional budget request (ABR) process, <i>"For the FY25 ICANN Operating Plan and Budget, ICANN community groups may submit resource requests as part of their submissions to the Public Comment proceeding on the Draft ICANN FY25 Plans, which closes at 23:59 UTC on Monday, 12 February 2024. ICANN will review all resource requests from the community. ICANN community groups may contact planning@icann.org with any questions before the deadline."</i> Submitting SO/AC specific ABRs via a public comment process focused on the entirety of the ICANN Budget and Operating Procedure process, seems unsustainable. Does ICANN envision a specific process for ABRs for SO/ACs outside the budget public comment process in the future?</p>	See 4.5.9
RySG	<p>Finally, in line with ICANN's recent guidance, please find the <u>RySG's additional budget request for eight (8) funded travel slots for the CPS and one (1) additional funded travel slot for regular ICANN meetings in FY25</u> below.</p> <p>In the past few years, the RySG has found incredible value in the opportunity the CPS provides contracted parties to discuss operational issues and best practices across the CPH. In addition, the engagement</p>	See 4.5.9

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
	<p>with staff has been invaluable. The RySG would like to request that ICANN support eight (8) travel slots for RySG participation for the Contracted Parties Summit (CPS) in FY25.</p> <p>Further, the RySG wishes to encourage, as best as possible, the broadest and most inclusive participation from all our members at these important community driven meetings, from across the full spectrum of our diverse membership. As such the RySG would like to request that ICANN supports a further one (1) travel slot for RySG participation for the ICANN Public Meetings during FY25 (Thus bringing the total number of slots available to eight (8)).</p> <p>The RySG Executive Committee will closely monitor any travel requests submitted by requiring the requestors to demonstrate their need, provide a statement of interest, indicate how they can benefit by participation and commit to actively participate in the CPS and ICANN Public Meetings as well as taking an active role in any follow-on activities from their meeting participation.</p> <p>The travel support currently provided to the RySG for members to participate in the three (3) ICANN meetings each year has resulted in a growth in new member participation and mentoring, a high level of participation in working groups and other critical efforts within the RySG and broader CPH. There is every expectation this same outcome will be realized by providing those members, who are otherwise unable to attend the CPS and ICANN Public Meetings with travel support funding.</p> <p>Such funding will afford them an opportunity to engage in the focused and outcome-driven sessions, to enhance their knowledge base of topics most directly focused on the RySG (and CPH), and ultimately provide further volunteer participation in on-going and ever-expanding critical activities within the RySG, GNSO and broader ICANN community. Additional travel funding will allow us to develop and mentor leadership within the RySG, enable small registries or those with new business models to participate, and provide the opportunity to reach out to those underserved geographic regions within the gTLD registries community and properly support their participation.</p> <p>In summary, the RySG respectfully submits a request for unrestricted support of eight (8) travel slots to participate in the CPS and one (1) additional travel slot for each of the three regular ICANN Public Meetings in FY25.</p>	

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
RySG	<p>Implement New gTLD auction proceeds recommendations as approved by the Board</p> <p>The RySG commends ICANN for unveiling its Grant Program to distribute the substantial proceeds from past ICANN Auctions of Last Resort and looks forward to the application process that is scheduled to begin on 25 March 2024.</p>	See 4.3.5
RySG	<p>ICANN Reserves</p> <p>The RySG notes that ICANN org continues supplementing the Reserve Fund, whereas,</p> <ul style="list-style-type: none"> • The ICANN Board only directed “an amount equal to one year of operating expenses as the minimum target level.” • With a reported balance of \$170M (as of 30 June 2023), this is 17% over the FY23 budgeted operating expenses of \$145M – more than the “slightly higher” difference noted in ICANN org’s documentation. • ICANN org also reports that it “contributed” \$34M to the Reserve Fund in 2022 and 2021 alone. This is almost the sum (\$36M) that the ICANN Board diverted from the Auction Proceeds in October 2018, and came at a time when ICANN expenses were significantly lower due to the global pandemic. <p>Given the current level of excess in the Reserve Fund and the reported trend of stability in ICANN’s revenue stream,</p> <ol style="list-style-type: none"> 1. Does ICANN org plan to seek ICANN Board authorization to return any/all of the \$36M diverted from the Auction Proceeds? This would be especially timely given the pending launch of the ICANN Grants Program. 2. Does ICANN org plan to seek ICANN Board clarification on the appropriate level for the Reserve Fund? The current “minimum target level” language has resulted in significant overages and offers no guardrail to the continued squirreling away of funds that could/should be better used elsewhere in the community. 	See 4.3.4
BC	<p>The BC is in general agreement of the funding and expense scenarios laid out for the draft Operating and Financial Plans for FY25-29 and FY25. We understand that the multi-year proposal is at a high level and will be continually monitoring throughout each fiscal year and that annual public comment requirements will allow for input from the community.</p>	See 4.5.2

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
BC	<p>The draft documents provided for review represent an enormous and thorough effort on the part of the ICANN Financial team and the BC recognizes this and appreciates their diligence. We are pleased that maintaining the format of providing details on 11 Operational Initiatives and 34 Functional activities in five service groups has been maintained. This eases review and comparison to previous years.</p> <p>BC is also appreciative of the method to identify new activities or strategic changes to existing ones by marking them with a delta (Δ).</p>	See 4.1
BC	<p>Accordingly, the BC accepts the proposed 'base-case' funding forecast of \$148 million for FY25, rising to a projected \$154.8 million by FY29. We also note that "ICANN plans for operating expenses to remain at or lower than budgeted funding, drawing from designated and available funding sources", and "Upholding two fundamental principles of ICANN's long-term financial sustainability is paramount: (i) preventing operating expenses from exceeding operation funding; and (ii) ensuring the continuous maintenance of adequate reserves. "</p> <p>The BC also notes that this funding and expenses represent a reasonable reflection of current and expected activities.</p>	See 4.5.2
BC	<p>BC notes that throughout both the FY25-29 and in FY25 that there are numerous references to the blog "<i>ICANN Interim President and CEO Shares Goals for Fiscal Year 2024</i>". It is valuable that this is being used to guide priorities and work in the Operational Initiatives and Functional Activities throughout the Draft ICANN FY25 BUDGET and the DRAFT OPERATING & FINANCIAL PLANS FOR FY25-29.</p> <p>The 13 emphasized goals in this blog highlight many areas of focus for BC given our broad-based membership with geographic diversity. We are specifically interested in the work that will be undertaken for the goals of Coalition for Digital Africa, The African Regional Internet Registry, Multilingual Internet, WSIS+20 Review, DNS Abuse, Next Round of New gTLDs and RDRS.</p>	See 4.2.3
BC	<p>Funding of New gTLD Program and Grant Program within ICANN Operations</p> <p>BC notes reference that there are allocations to ICANN Operations for programs that have their own funding from the funds under management. Can you provide clarification of how ICANN Operation budget us supporting these programs rather than being supported by their own funds:</p> <ul style="list-style-type: none"> \$4 million to New gTLD Program: 2012. \$26 million to New gTLD Program: Next Round implementation. 	See 4.5.4

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
	As we understand it, New gTLD Program. \$2 million, including direct expenses and allocations from ICANN Operations to Grant Program.	
BC	The BC commends the plan to grow the Reserve funds further by \$1Million in 12 calendar months, towards having an estimated ending balance of \$173M by the Year end.	See 4.3.4
BC	FY25 Budget versus FY24 Forecast BC understands that there will be increased personnel cost for FY25 and feel it is admirable to try to offset such increases with efficiencies in Travel & Meetings and Professional Services, but we seek an understanding of what reductions need to be made to accomplish \$6 million in savings to these other areas.	See 4.5.3
BC	We also note in the FY25-29 projection, that Travel will remain flat at \$13 million, while FY24 was originally budgeted at \$17 million. While reductions and stabilizing is admirable, we are interested to understand how this can be achieved and note the summary in 4.4.2 ICANN Public Meeting.	See 4.5.8
BC	Internal Operations The BC notes that the Internal Operations activity covers \$42 million of the \$148 million budget set for ICANN Operations for which 47% or 19.74M is earmarked for Engineering and IT. This category does not include costs related to IANA or IMRS, which are reflected in the Technical Mission activity, or support for ICANN Public Meetings which is reflected in the Community and Engagement activity. On the other hand, the Technical Mission activity is estimated to require \$24 Million in funding from the ICANN Operations budget. When coupled with the provision of 11.5M dedicated to the PTI FY25 Operating Plan and Budget as well as IANA Support Activities, ICANN’s investment in it Technical infrastructure and it’s maintenance amounts to an estimated \$55.24M. As a Technical organization it would be helpful to track what percentage of ICANN’s budget is directly devoted to her technical functions as compared to Operations and Community Engagement Systems.	See 4.5.2

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
BC	<p>ICANN Public Meetings With all meeting locations for FY25 not yet confirmed, BC wants to make sure travel estimates are considering prospective locations. We note that in FY24 Hamburg is identified at \$4.6 (actual - not estimated) while Istanbul is budgeted at \$4.2. In addition, the FY24 Policy Forum (scheduled for Kigali though presented as TBA) is budgeted at \$4.2 whereas the same meeting in FY25 (noted as TBA) is budgeted at \$3.9. Can we get more detail that improves our understanding of the variables?</p>	See 4.5.8
BC	<p>Contingency We understand that Contingency allocation remains at \$500,000 for FY25 and beyond. We are aware that this has historically been an adequate amount within ICANN Operations although we understand that there may be at least one change in how Contingency is used. In the past year, CSG and NCSG (collectively NCPH) have developed plans to meet periodically for intersessional. BC wishes to confirm our understanding that funding for these can be considered within Contingency rather than to be separately budgeted. If these are to be separately included in travel planning, we would like to know the application timeline for such approvals.</p>	See 4.5.7
BC	<p>New gTLD Program: Next Round The BC is aligned that Policy Implementation work is a crucial driver of the overall timeline for opening the next round of applications for new gTLDs and supports the deployment of agile methods including the use of small teams to achieve this end. As ICANN org expects it will take one year to complete operationalization work, including systems development and testing, which enables the application round to open in Q2 of calendar year 2026, it is our hope that all related work is completed well ahead of this timeline.</p>	See 4.5.4
BC	<p>Additional Budget Request As ICANN has transitioned the Additional Budget Request process into the annual Operating Plan and Budget process, the BC suggests that request submissions be structured as in the case of the previously established ABR process.</p>	See 4.5.9
BC	<p>Contractual Compliance Considering approvals of new requirements under the Base gTLD Registry Agreement (RA), and 2013 Registrar Accreditation Agreement (RAA), BC is pleased to see that the Compliance team “plans to increase its headcount to support contractual compliance audits and reporting activities.” This is helpful to mitigate DNS Abuse that has been a focus for</p>	See 4.4.2

Submitter Organization / Individual	Question / Comment	Reference to Section of Staff Report where Response can be found
	BC and its members. We are encouraged by this and while we see an increase in FTE for Technical and DNS Security from 75 in FY24 to 79 in FY25, it is not clear if 26 FTE for FY25 is an increase for Compliance. Can you clarify?	
BC	<p>Promote and evolve the DNS through open and transparent processes that enable competition and open entry in Internet-related markets while ensuring the stability, security, and resiliency of the DNS.</p> <p>The BC has members across the globe, and we are encouraged by the emphasis being placed on Universal Acceptance throughout the FY25-29 draft and with new activities (marked by Δ) in the Functional Activities section</p>	See 4.3.6
BC	<p>Geopolitical monitoring, engagement, and mitigation and Government and Intergovernmental Organization Engagement.</p> <p>The BC notes strong emphasis being placed on these topics and well-articulated in Operational Initiatives and in Functional Activities. Recognition that increased resources will be needed in this area is appropriately reflective of the importance of this engagement and consistent with ICANN Interim President and CEO Shares Goals for Fiscal Year 2024. This will remain vital in the coming years.</p> <p>The Delta Δ points of new focus in Functional Activity of Government and Intergovernmental Organization Engagement emphasize this clearly. The BC is encouraged with the emphasis being placed on DNS Abuse, RDRS, Contractual Compliance and geo-political engagement. Regarding RDRS, we believe the operating plan should be amended to include meaningful review and analysis of the RDRS trial and the overall activities related to reaching a comprehensive approach to collection and access to DNS registration data.</p>	See 4.3.3
BC	While we have not focused our comments on the entire scope of the Drafts, we note that all areas have measurable progress tracking, and we will remain active in providing our insights to all initiatives of relevance to BC over time.	See 4.2.1

7.2 Public Comments Received After the Public Comment Period Deadline

The table below includes all Public Comments received by ICANN org after the Public Comment window. These comments are not listed on the Public Comments page. Where applicable

ICANN org will reference responses for similar comments received before the deadline in the “Reference to the Section of this Report” column.

Submitter Organization	Question/Comment	Reference to Section of Staff Report where Response can be found
Individual - Judith Hellerstein & Remmy Nweke	We appreciate all the work that the Planning Department within ICANN has done to make this budget and the relevant strategic planning documents easy to read. We also understand the methodology that ICANN is using for funding with its two different scenarios as it better allows the staff to identify predictions about future funding conditions while utilizing a set of base assumptions that are expected to result in a realistic outcome.	See 4.5.2
Individual - Judith Hellerstein & Remmy Nweke	Accessibility Concerns: We noticed that the Budget and Strategic plans documents have several accessibility issues from missing alternative (ALT) texts for the images and graphs to poor color contrast, and other accessibility issues make these documents difficult to read by persons with disabilities. We should make more efforts to be inclusive and this is easy to do as Adobe, Word or Excel have accessibility checks but it seems these were not used.	See 4.1
Individual - Judith Hellerstein & Remmy Nweke	The Strategic and Operational Initiatives call for an increased Full Time Equivalent (FTE) to ensure that the goals are met, however the Budget has no increase in the FTEs, so where will this FTE come from?	See 4.5.3
Individual - Judith Hellerstein & Remmy Nweke	<p>Facilitate the DNS Ecosystem Improvements:</p> <p>This means working toward a more secure Domain Name System (DNS) that will be mutually beneficial for the ecosystem.</p> <p>It's worthy to adopt the latest study in 2020 of the Domain Name System Security Facilitation Initiative Technical Study Group (DSFI-TSG) on this subject and probably consider its finalized charter and scope, which basic recommendations were based on some five points, namely:</p> <ol style="list-style-type: none"> 1. What are the mechanisms or functions currently available that address DNS security? 2. Can we identify the most critical gaps in the current DNS security landscape? 3. Who is best suited to fill those gaps? 4. What are the risks associated with these gaps that may not be well understood? 5. Does the DNS have unique characteristics that attract security problems, which other Internet services don't have? 	
Individual - Judith Hellerstein & Remmy Nweke	We appreciate the creation and production of the Domain Name Marketplace Indicators and other supporting analysis as these indicators help the community keep track of the health of the DNS industry. They provide useful data points which can be examined and extrapolated for the formulative of both reactive and proactive steps in ensuring the stability, security and resilience of the DNS. The same is true	See 4.3.6

Submitter Organization	Question/Comment	Reference to Section of Staff Report where Response can be found
	for the excellent reports produced by ICANN on the Africa and Middle East DNS industries. The 2023 Africa Domain Name Industry Study, and the Middle East Domain Name Industry Study 2023 were extremely helpful as were the webinars explaining these reports. We encourage ICANN to do the same with the Latin American and Caribbean DNS Marketplace and other regions not covered.	
Individual - Judith Hellerstein & Remmy Nweke	As regards the Universal Acceptance Steering Group we greatly appreciate the continual support for this group and in particular for the UA Day initiative. We also look forward to progress by ICANN ORG (in requiring, selecting and/or migrating to system vendors that comply with UA in its procurement practices, to further champion UA.	See 4.3.6
Individual - Judith Hellerstein & Remmy Nweke	<p>Evolve and strengthen the multistakeholder model to facilitate diverse and inclusive participation in policymaking.</p> <p>We suggest that ICANN also establish tracking metrics not only for how many fellows and next gen participants become active but also for all new members attending ICANN. These metrics we see as extremely helpful to the understanding which newcomers become actively engaged and continue to do so. The metric will also give us a better understanding of what people are interested in and to follow up with them and get them to become more active.</p>	See 4.3.2
Individual - Judith Hellerstein & Remmy Nweke	<p>Evolve and strengthen the multistakeholder model to facilitate diverse and inclusive participation in policymaking.</p> <p>In this section, ICANN lists its intention to evaluate specific community-led initiatives including initiatives that support representation and inclusivity. <i>“This evaluation will aid the community in determining any additional actions needed to maintain inclusivity and global representation within ICANN policymaking.”</i></p> <p>One way of addressing this issue of bringing in new and diverse participants in the process, is perhaps a better understanding of what efforts or initiatives work to get them to these meetings and keep them interested.</p> <p>Several programs that ICANN has funded in the past either through the older ABR process, through GSE or other funding streams are the various schools of Internet Governance. Perhaps a more dedicated funding stream supporting these schools whether they be national, regional or continent wide programs could be a good option.</p>	See 4.3.2
Individual - Judith Hellerstein & Remmy Nweke	<p>Evolve and strengthen the multistakeholder model to facilitate diverse and inclusive participation in policymaking.</p> <p>Another way of improving the diversity of the participants is to increase the use of Language Services and have more sessions in languages other than English. Additionally, as explained later, Human Captioning or Real-time Transcription (RTT) could be added in different languages and available as a stream text link.</p> <p>Automated captioning via zoom is helpful but gets many things wrong and is harder to put through a translation engine for participants.</p>	See 4.4.6

Submitter Organization	Question/Comment	Reference to Section of Staff Report where Response can be found
Individual - Judith Hellerstein & Remmy Nweke	<p>Evolve and strengthen the ICANN community’s decision-making processes to ensure efficient and effective policy making.</p> <p>We are anxious to see how the enhancement and expansion of the “community engagement system to evolve stakeholder participation” , as noted in the interim president and CEO’s goals for fiscal year 2024 will help the community make more effective use of its active volunteer workforce.</p> <p>We are hopeful that all the new information and metrics gained through this new system would enable us to better understand what are the missing gaps in the volunteer resources available to various stakeholders?</p> <p>Why do these gaps exist? What is the best way to eliminate or erase these gaps?</p> <p>We look forward to a community discussion about how the CEO could help the community better understand the strengths and weaknesses of its volunteer workforce, especially the contribution of those volunteers with no specific ties to the domain name industry</p>	See 4.3.1
Individual - Judith Hellerstein & Remmy Nweke	<p>Evolve and improve internal and external ethics policies.</p> <p>This initiative is very important as in the past the ethics policies were not transparent and so good to see more accountability in this area. We think stricter ethics rules should be in place. However, the rules should make sense and not just be very broad as these will not be as effective.</p>	
Individual - Judith Hellerstein & Remmy Nweke	<p>Geopolitical monitoring, engagement, and mitigation.</p> <p>This is a very important operating initiative as there is a great need for ICANN Org staff on the Government Engagement team not only to track and monitor many of these proceedings but to participate as well. These discussions and decisions made at these levels can have a profound effect on ICANN and the multistakeholder system and so staff might need to grow and expand to cover all these issues.</p>	See 4.3.3
Individual - Judith Hellerstein & Remmy Nweke	<p>Geopolitical monitoring, engagement, and mitigation.</p> <p>We were glad to see the importance that ICANN Org has put on the IGF with a number of Board Members and staff there. In the past, the ICANN GE team participated but on a lower level and so glad to see that the engagement has increased, and they are using these meetings for networking opportunities with leaders and other officials in these areas.</p>	See 4.3.3
Individual - Judith Hellerstein & Remmy Nweke	<p>Geopolitical monitoring, engagement, and mitigation.</p> <p>We see the need for ICANN to continue to cover and report on the various activities listed such as the WSIS+20 Review Process, UN’s Global Digital Compact (GDC), UN’s Summit of the Future, The Council on Science and Technology Development (CSTD), the International Telecommunication Union (ITU) Development Sector, the ITU’s Council Working Groups (CWG) in particular the CWG on International Internet Public Policy which will discuss Universal Acceptance, IDNs, and Multilingualism as well as other aspects of Domain Names.</p>	See 4.3.3

Submitter Organization	Question/Comment	Reference to Section of Staff Report where Response can be found
Individual - Judith Hellerstein & Remmy Nweke	<p>Geopolitical monitoring, engagement, and mitigation. Government Engagement reports on the progress of the UN AdHoc Committee on CyberCrime are also very active. ICANN Org has published several notes on the work of this committee. This department also tracks the recent EU legislation on privacy, digital services and artificial intelligence as well as the Excellent work that the OECD has been doing on the digital economy. In the next few years the number of topics covered and tracked by this unit will only grow and not shrink so it will be important for ICANN Org staff to follow these issues to keep the community up to date.</p>	See 4.3.3
Individual - Judith Hellerstein & Remmy Nweke	<p>Implement New gTLD auction proceeds recommendations as approved by the Board. We are glad to see that this program is finally up and running and we look forward to seeing the results of the first grant.</p>	See 4.3.5
Individual - Judith Hellerstein & Remmy Nweke	<p>Implement New gTLD auction proceeds recommendations as approved by the Board. In reviewing the budget for the Auction Proceeds we wonder why when ICANN is allocating only 10 million USD in FY25, the cost of handling the fund and this initial round of projects and grants is quite high costing 2 million USD or 20% of the expected allocation. We would think the cost would be commensurate with the size of the grant allocation this year. Will the staff that have been assigned to the new ICANN Grant program travel to the meetings? If yes, where will we see this calculation? We ask this since the travel figure is set at a fixed amount so it is unclear who will be traveling? If staff are traveling, will the travel and expenses come out of the Auction Proceeds fund expenses or in the general ICANN travel and meetings budget line.</p>	See 4.5.5
Individual - Judith Hellerstein & Remmy Nweke	<p>Policy Development and Advice Under this initiative, ICANN plans to track the progress of community-driven projects (e.g., number and duration of projects and activities, volume and extent of community work including meeting hours, webinars, and preparation time required) and publication of resolutions, policy recommendations, and other community decisions. We are extremely interested to learn how this tracking will be done and what metrics will be used or adopted to meet this goal.</p>	See 4.4.13
Individual - Judith Hellerstein & Remmy Nweke	<p>Policy Development and Advice ICANN states that as the number of policy initiatives grows the ICANN Policy Development staff will grow as well. We are interested in learning how this will happen and also how to ease the burden on the volunteers who spend countless hours on ICANN work. We understand that the Policy Development Support function is being reorganized and we are interested in learning about the new structure and how to ensure that the new structure is the most effective way of organizing the staff. According to the advice in the budget, ICANN states that the</p>	See 4.4.13

Submitter Organization	Question/Comment	Reference to Section of Staff Report where Response can be found
	current number of staff and available resources are unlikely to be sufficient to manage additional projects and activities and that more staff are needed. As such, it needs to better align community expectations and support needed. We are concerned that if staff are not hired in a timely manner then the Board may have to defer or reduce the number of new policy projects, which would lead to trade-offs about what policies/projects to prioritize with the available staff.	
Individual - Judith Hellerstein & Remmy Nweke	<p>Policy Research and Stakeholder Programs</p> <p>Here again to ensure that recommendations are carried out, additional staff and other resources are needed to deliver this work, as major policy efforts continue through implementation, and operational readiness work continues to support future gTLD application rounds. Increased resources are needed to support the ongoing implementation of Board-approved review team recommendations, including a number of study and research requests.</p>	See 4.4.14
Individual - Judith Hellerstein & Remmy Nweke	<p>Technical Services</p> <p>This function provides technical knowledge and data inside ICANN org regarding the DNS and works to maintain the security and stability of the DNS. We acknowledge that as ICANN states additional staff and resources will be ensure that the following are implemented:</p> <p>EPDP on the Temporary Specification for gTLD Registration Data Phase 2 implementation.</p> <p>Operational readiness planning to support future gTLD applications and operation. Increased responsibilities, e.g., CZDS, RST, Technical Onboarding re-platforming, implementing the RDAP amendment, and implementing changes related to the Registration Data Policy.</p> <p>Lack of staff may delay this implementation of the recommendations and we are concerned about these issues.</p>	See 4.4.17
Individual - Judith Hellerstein & Remmy Nweke	<p>Strategic Initiatives</p> <p>The Strategic Initiatives functional activity leads and provides support for strategic initiatives and evolving issues that impact ICANN's remit and stakeholders. It includes supporting work undertaken by the community, such as the coordination of ICANN's strategy as it relates to compliance with the European Union's General Data Protection Regulation (GDPR) and other global data protection and privacy legislation, mitigating DNS security threats, special projects related to the New gTLD Program: Next Round, IDNs and UA-related topics, and provides general support for the Global Domains and Strategy (GDS) function.</p> <p>We hope that ICANN is correct and additional resources will not be needed to complete this work and that all proposed activities are carried out as planned.</p>	See 4.4.16
Individual - Judith Hellerstein & Remmy	<p>Constituent and stakeholder travel</p> <p>We look forward to the publishing of new ICANN Community Travel Support Guidelines (TSG) and hope that there will be a specific opportunity to provide input into the TSG, the practices of ICANN's travel team, and those of the contracted</p>	See 4.4.1

Submitter Organization	Question/Comment	Reference to Section of Staff Report where Response can be found
Nweke	travel management service provider. We look forward to providing more extensive input whenever this public comment is open.	
Individual - Judith Hellerstein & Remmy Nweke	<p>Constituent and stakeholder travel</p> <p>We call your attention to the need for more transparency in funded travelers. We understand that allocating limited travel funding among ICANN community members requires prioritization and each of the Constituencies and SO/AC works on these issues to provide ICANN with a list of all funded travelers. Travel Support Guidelines should be updated on a regular basis.</p> <p>Additionally, for several travelers it takes many months to get a visa and sometimes people are not successful but this often happens too late to substitute another funded traveler so we ask that the process start sooner so that people could get the visas needed. Also, if these visas cannot be obtained there is additional time to substitute another traveler.</p> <p>Additionally, we might need to revise the way visa letters are issued, especially for funded travelers. Time and again we hear stories of funded travelers finally receiving appointments and then appearing in the embassy only to be turned away because of that embassy's particular bureaucracy, requirements and need for specificity. Many people spoke about how embarrassing it is. How some Embassies ask who is funding you or other questions. We understand that ICANN is dependent on the host country for assistance, but certain small things could be done to help smooth out the process. For the funded travelers, ICANN travel can issue specific letters specifically stating the person's name and that ICANN is paying for this person's flight, their hotel (give a name) and the dates as well as providing a per diem for their days in the country. This way when funded travelers appear at the embassy they will have all the paperwork that the embassy needs and will not get turned away.</p>	See 4.4.1
Individual - Judith Hellerstein & Remmy Nweke	<p>Constituent and stakeholder travel</p> <p>We also call attention to the travel and meeting expenses in the budget which are calculated to be 13 million USD for FY 25 and for the next 5 years, but all indications are that travel costs are increasing, often significantly and this does not seem to be accounted for. Is the Org anticipating meeting any shortfalls with staff travel cuts? Or does it mean that less ICANN staff will be traveling?</p>	See 4.5.8
Individual - Judith Hellerstein & Remmy Nweke	<p>Global Stakeholder Engagement</p> <p>We greatly appreciate all the work that the GSE does in helping constituencies carry out their responsibilities. We also want to ensure that the GSE is properly staffed so it can carry out its responsibilities. Each of the five regions within ICANN are very different and so require different levels of staffing. Some regions, such as the Pacific are quite vast and so could use more than 1 person to help cover the region appropriately.</p>	See 4.4.8
Individual - Judith	<p>Global Meetings Operations (Meetings)</p> <p>We are interested in learning how ICANN Org will be tracking what it is calling</p>	See 4.4.7

Submitter Organization	Question/Comment	Reference to Section of Staff Report where Response can be found
Hellerstein & Remmy Nweke	<p>“meaningful stakeholder participation increases” and hope these metrics are fully transparent and accountable .</p> <p>We greatly appreciate all the efforts that the Meetings team puts into planning for the three global meetings and all other meetings held. The benefits of well-planned and globally distributed global meetings; suitable logistics, contracting and even sourcing of suitable and accessible venues, inclusive of sufficient accommodation options etc., is a key and critical contribution to what we believe is a unique and invaluable aspect of ICANN’s Multistakeholder model.</p>	
Individual - Judith Hellerstein & Remmy Nweke	<p>Government and Intergovernmental Organization Engagement (GE)</p> <p>We greatly appreciate all the reports and briefings that this office provides. We find them informative and helpful. It would be great if the frequency of the reports were expanded. We see the need for ICANN to continue to cover and report on the various activities listed such as the WSIS+20 Review Process, UN’s Global Digital Compact (GDC), UN’s Summit of the Future, the International Telecommunication Union (ITU) Development Sector, the ITU’s Council Working Groups (CWG) in particular the CWG on International Internet Public Policy which will discuss Universal Acceptance, IDNs, and Multilingualism as well as other aspects of Domain Names. Additionally, the group reports on the progress of the UN AdHoc Committee on CyberCrime is also very active. ICANN Org has published several notes on the work of this committee. This department also tracks the recent EU legislation on privacy, digital services and artificial intelligence as well as the Excellent work that the OECD has been doing on the digital economy. In the next few years, the number of topics covered and tracked by this unit will only grow and not shrink so it will be important for ICANN Org staff to follow these issues to keep the community up to date.</p>	See 4.4.9
Individual - Judith Hellerstein & Remmy Nweke	<p>Government and Intergovernmental Organization Engagement (GE)</p> <p>These discussions and decisions made at these levels can have a profound effect on ICANN and the multistakeholder system and so staff might need to grow and expand to cover all these issues.</p>	See 4.4.9
Individual - Judith Hellerstein & Remmy Nweke	<p>Global Communications and Language Services</p> <p>ICANN’s Global Communications and Language Services function is responsible for creating awareness of ICANN and its role in supporting the public interest, and ensuring that ICANN is represented accurately and consistently in all forms of communication. This is the unit that provides language services to the community.</p> <p>There is a great need to increase the number of sessions covered by real time transcription (RTT). While Machine transcription it is often not accurate and could also cause more problems and create cultural issues. ICANN should expand the use of RTT and also look to expand it to other languages besides English. While some ICANN meetings are offered in the other UN languages, RTT or other forms of transcription should also be offered. This is an especially problematic issue for</p>	See 4.4.6

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	<p>increasing participation from developing countries where the language is often not in English. Additionally, with many people participating from developing countries where bandwidth is an issue, having RTT as a stream text (text only stream) will allow for increased participation from countries since even with a low bandwidth people can follow the stream text transcription and keep abreast of the conversation. Zoom often drops out and they are left with gaps and the RTT will allow them to stay more focused and contribute more to the conversation. Having RTT in other languages will also increase participation in francophone Africa and other places. Currently, Language services only have English RTT, but the past At Large Captioning Pilot showed that RTT in Spanish and French greatly expanded participation which meets the ICANN operational initiatives. Moreover, that vendor had no issues providing RTT in Spanish and French when we requested it.</p>	
Individual - Judith Hellerstein & Remmy Nweke	<p>ICANN FY25 Budget We appreciate the Budget breakdown by activity, and especially inside each activity, in this way it is easier to understand where the money is allocated.</p>	See 4.5.1
Individual - Judith Hellerstein & Remmy Nweke	<p>ICANN FY25 Budget One of our concerns is with the actual budgeted cost of handling both the Supplemental Fund for Implementation of Community Recommendations (SFICR) and the ICANN Grant Program. The cost of handling the SFICR Fund is about 2 million USD, but it seems the only function actually budgeted for is for the New gTLD program, what other uses will the SFICR fund be used for? Moreover, it is unclear whether this fund will be replenished once the New gTLD process gets going and begins on generating money where this money will go? Will it be given back to the SFICR or remain with the new gTLD fund.</p>	See 4.5.6
Individual - Judith Hellerstein & Remmy Nweke	<p>ICANN FY25 Budget ICANN Grant Program, although this fund is much larger than the SFICR, ICANN is only allocating 10 million USD in FY25, however, the cost of handling the fund and this initial round of projects and grants is quite high costing 2 million USD or 20% of the expected allocation.</p>	See 4.5.6
Individual - Judith Hellerstein & Remmy Nweke	<p>ICANN FY25 Budget Lastly, the average Full Time Employees (FTEs) and the Program to Date and Projected Next Round Financials as seen in the FY25 table, show that the FTEs are supposed to grow to 46 FTE for FY25, and a cost of around 47.7 million USD (April 2023 – June 2025). However, the financials do not show any projected revenue or incomes estimated for the next round?</p>	See 4.5.4
Individual - Judith Hellerstein	<p>In conclusion, we appreciate the opportunity to comment on the Draft ICANN FY25-29 Operating and Financial Plan, Draft ICANN FY25 Operating Plan and Budget, and the Draft IANA FY25 Operating Plan and Budget. We would like to recognize</p>	See 4.1

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& Remmy Nweke	the tremendous effort that ICANN ORG, in particular the ICANN ORG Planning Team, has devoted to developing this cross-functional financial and operational plan for the ICANN Community to review and on which to provide input. We greatly also appreciate the breakdown and small table of contents in each of the sections and the clickable links provided are extremely helpful with a document that is 255 pages long.	
Individual - Judith Hellerstein & Remmy Nweke	<p>IANA FY25 Budget</p> <p>We appreciate that inflation is being taken into account this year in the FY25 IANA budget. We also highly appreciate the decrease in Professional Services and the increase in Full Time Equivalent personnel since these are core functions in ICANN and should be carried out by ICANN org staff.</p>	See Section 5
RrSG	The Registrar Stakeholder Group (RrSG) appreciates the opportunity to comment on the Draft ICANN FY25 Plans. Overall there are no significant concerns and generally the information and level of detail provided is good.	See 4.1
RrSG	<p>IANA FY25 Budget</p> <p>In the IANA FY25 budget, there is an increase in headcount between Actual FY23 and Budget FY25 and it would be useful to see a breakdown and justification for this change.</p> <p>In the IANA FY25 – FY29 plan and budget 13 new staff are forecast to be hired FY24 for new gTLDs and 15 are budgeted FY25 (page 13 of the highlights report). This seems to be a high number of staff and it would similarly be useful to have more information and justification for this.</p>	See 4.4.11
RrSG	This was not considered in the reports, but the RrSG has some concerns for ICANN’s consideration around financial security for registrars regarding payment fraud during the Add-Grace Period (AGP). Some bad actors are increasing the pressure on registrars by registering large numbers of domains, using fraudulent credit cards or by hacking registrars or registrant’s accounts. This could have an impact on new fees and on the financial health of the registrars, the fees paid by registrars to registries, and the ICANN fee collected by every registrar for each year of domain registration, renewal or transfer.	
RrSG	Finally, the RrSG suggests that ICANN begin to consider its impact on climate change, and for opportunities to reduce or offset its carbon footprint, and to plan accordingly due to the potential financial impact of such actions (and the potential financial impact of not taking any action). This can include the technology that powers the DNS, and ICANN meetings. The COVID-19 pandemic reinforced the importance and productivity of in-person ICANN meetings; however ICANN and the community should take steps to mitigate the impact on the climate. Some participants in the ICANN ecosystem are already addressing these concerns, which can be leveraged to benefit the entire ICANN community.	See 4.4.3

RrSG response to Draft ICANN FY25 Plans

The Registrar Stakeholder Group (RrSG) appreciates the opportunity to comment on the [Draft ICANN FY25 Plans](#). Overall there are no significant concerns and generally the information and level of detail provided is good. The RrSG has a few specific suggestions below.

In the IANA FY25 budget, there is an increase in headcount between Actual FY23 and Budget FY25 and it would be useful to see a breakdown and justification for this change.

In the IANA FY25 – FY29 plan and budget 13 new staff are forecast to be hired FY24 for new gTLDs and 15 are budgeted FY25 (page 13 of the highlights report). This seems to be a high number of staff and it would similarly be useful to have more information and justification for this.

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Comment on the Draft ICANN FY25 Operating Plan and Draft ICANN FY25 Budget

Judith Hellerstein and Remy Nweke submit this comment on the ICANN FY 25 Operating Plan and Budget.

We appreciate all the work that the Planning Department within ICANN has done to make this budget and the relevant strategic planning documents easy to read. We also understand the methodology that ICANN is using for funding with its two different scenarios as it better allows the staff to identify predictions about future funding conditions while utilizing a set of base assumptions that are expected to result in a realistic outcome.

Comments on Draft ICANN FY25-29 Operating and Financial Plan and FY Operating Plan and Budget:

ICANN's Operating Plan includes operating initiatives, which are key activities to achieve the Strategic Plan, and functional activities, which support the processes and mechanisms that permit the community to complete its work. Key activities highlighted in these plans include:

- The implementation of Specific Review Recommendations
- The New gTLD Program: Next Round implementation
- Operating Initiatives to achieve the FY21-25 Strategic Plan

Some operating initiatives in the Operating Plan also incorporate multi-year goals outlined in the blog titled "ICANN Interim President and CEO Shares Goals for Fiscal Year 2024," and these goals will be noted where applicable.

ICANN's planning process has three components: a Five-Year Strategic Plan, a Five-Year Operating and Financial Plan, and an annual Operating Plan and Budget.

General Comments:

- **Accessibility Concerns:** We noticed that the Budget and Strategic plans documents have several accessibility issues from missing alternative (ALT) texts for the images and graphs to poor color contrast, and other accessibility issues make these documents difficult to read by persons with disabilities. We should make more efforts to be inclusive and this is easy to do as Adobe, Word or Excel have accessibility checks but it seems these were not used.
- The Strategic and Operational Initiatives call for an increased Full Time Equivalent (FTE) to ensure that the goals are met, however the Budget has no increase in the FTEs, so where will this FTE come from?

Operating Initiatives:

Listed below are the 10 operating initiatives.

1. Support the evolution and strengthening of Root Zone Management and the Root Server System.
2. Facilitate the DNS ecosystem improvements.
3. Evolve and strengthen the multistakeholder model to facilitate diverse and inclusive participation in policymaking.
4. Evolve and strengthen the ICANN community's decision making processes to ensure efficient and effective policymaking.
5. Evolve and improve internal and external ethics policies.
6. Promote and evolve the DNS through open and transparent processes that enable competition and open entry in Internet-related markets while ensuring the stability, security, and resiliency of the DNS.
7. Geopolitical monitoring, engagement, and mitigation.
8. Implement New gTLD auction proceeds recommendations as approved by the Board.
9. Planning at ICANN.
10. ICANN Reserves

Operating initiative 2: Facilitate the DNS ecosystem improvements.

Facilitate the DNS ecosystem improvements:

This means working toward a more secure Domain Name System (DNS) that will be mutually beneficial for the ecosystem.

It's worthy to adopt the latest study in 2020 of the [Domain Name System Security Facilitation Initiative Technical Study Group \(DSFI-TSG\)](#) on this subject and probably consider its finalised [charter](#) and scope, which basic recommendations were based on some five points, namely:

1. What are the mechanisms or functions currently available that address DNS security?
2. Can we identify the most critical gaps in the current DNS security landscape?
3. Who is best suited to fill those gaps?
4. What are the risks associated with these gaps that may not be well understood?
5. Does the DNS have unique characteristics that attract security problems, which other Internet services don't have?

We appreciate the creation and production of the Domain Name Marketplace Indicators and other supporting analysis as these indicators help the community keep track on the health of the DNS industry. They provide useful data points which can be examined and extrapolated for the formulative of both reactive and proactive steps in ensuring the stability, security and resilience of the DNS. The same is true for the excellent reports produced by ICANN on the Africa and Middle East DNS industries. The 2023 Africa Domain Name Industry Study, and the Middle East Domain Name Industry Study 2023 were extremely helpful as was the webinars explaining these reports. We encourage ICANN to do the same with the Latin American and Caribbean DNS Marketplace and other regions not covered.

As regards the Universal Acceptance Steering Group we greatly appreciate the continual support for this group and in particular for the UA Day initiative. We also look forward to progress by ICANN ORG (in requiring, selecting and/or migrating to system vendors that comply with UA in its procurement practices, to further champion UA.

Operating initiative 3: Evolve and strengthen the multistakeholder model to facilitate diverse and inclusive participation in policymaking.

We suggest that ICANN also establish tracking metrics not only for how many fellows and next gen participants become active but also for all new members attending ICANN. These metrics we see as extremely helpful to the understanding which newcomers become actively engaged and continue to do so. The metric will also give us a better understanding of what people are interested in and to follow up with them and get them to become more active.

In this section, ICANN lists its intention to evaluate specific community-led initiatives including initiatives that support representation and inclusivity. *“This evaluation will aid the community in determining any additional actions needed to maintain inclusivity and global representation within ICANN policymaking.”*

One way of addressing this issue of bringing in new and diverse participants in the process, is perhaps a better understanding of what efforts or initiatives work to get them to these meetings and keep them interested.

Several programs that ICANN has funded in the past either through the older ABR process, through GSE or other funding streams are the various schools of Internet Governance. Perhaps a more dedicated funding stream supporting these schools whether they be national, regional or continent wide programs could be a good option.

Another way of improving the diversity of the participants is to increase the use of Language Services and have more sessions in languages other than English. Additionally, as explained later, Human Captioning or Real-time Transcription (RTT) could be added in different languages and available as a stream text link. Automated captioning via zoom is helpful but gets many things wrong and is harder to put through a translation engine for participants.

Operating initiative 4: Evolve and strengthen ICANN community’s decision-making processes to ensure efficient and effective policy making.

We are anxious to see how the enhancement and expansion of the “community engagement system to evolve stakeholder participation”, as noted in the interim president and CEO’s goals for fiscal year 2024 will help the community make more effective use of its active volunteer workforce.

We are hopeful that all the new information and metrics gained through this new system would enable us to better understand what are the missing gaps in the volunteer resources available to various stakeholders?

Why do these gaps exist? What is the best way to eliminate or erase these gaps?

We look forward to a community discussion about how the CEO could help the community better understand the strengths and weaknesses of its volunteer workforce, especially the contribution of those volunteers with no specific ties to the domain name industry.

Operating initiative : Evolve and improve internal and external ethics policies.

This initiative is very important as in the past the ethic policies were not transparent and so good to see more accountability in this area. We think stricter ethic rules should be in place. However, the rules should make sense and not just be very broad as these will not be as effective.

Operating initiative 7. Geopolitical monitoring, engagement, and mitigation.

This is a very important operating initiative as there is a great need for ICANN Org staff on the Government Engagement team not only to track and monitor many of these proceedings but to participate as well. These discussions and decisions made at these levels can have a profound effect on ICANN and the multistakeholder system and so staff might need to grow and expand to cover all these issues.

We were glad to see the importance that ICANN Org has put on the IGF with a number of Board Members and staff there. In the past, ICANN GE team participated but on a lower level and so glad to see that the engagement has increased, and they are using these meetings for networking opportunities with leaders and other officials in these areas.

We see the need for ICANN to continue to cover and report on the various activities listed such as the WSIS+20 Review Process, UN's Global Digital Compact (GDC), UN's Summit of the Future, The Council on Science and Technology Development (CSTD), the International Telecommunication Union (ITU) Development Sector, the ITU's Council Working Groups (CWG) in particular the CWG on International Internet Public Policy which will discuss Universal Acceptance, IDNs, and Multi-lingualism as well as other aspects of Domain Names.

Government Engagement reports on the progress of the UN AdHoc Committee on CyberCrime is also very active. ICANN Org has published several notes on the work of this committee. This department also tracks the recent EU legislation on privacy, digital services and artificial intelligence as well as the Excellent work that the OECD has been doing on the digital economy. In the next few years the number of topics covered and tracked by this unit will only grow and not shrink so it will be important for ICANN Org staff to follow these issues to keep the community up to date.

Operating initiative 8. Implement New gTLD auction proceeds recommendations as approved by the Board.

We are glad to see that this program is finally up and running and we look forward to seeing the results of the first grant.

In reviewing the budget for the Auction Proceeds we wonder why when ICANN is allocating only 10 million USD in FY25, the cost of handling the fund and this initial round of projects and grants is quite high costing 2 million USD or 20% of the expected allocation. We would think the cost would be commensurate with the size of the grant allocation this year.

Will the staff that have been assigned to the new ICANN Grant program travel to the meetings? If yes, where will we see this calculation? We ask this since the travel figure is set at a fixed amount so it is unclear who will be travelling? If staff are travelling, will the travel and expenses come out of the Auction Proceeds fund expenses or in the general ICANN travel and meetings budget line.

Functional Activities:

Policy Development and Advice

The Policy Development Support function facilitates the policy development and advisory work of the ICANN community. It provides governance and process management, subject-matter expertise, and administrative and professional secretariat support to ICANN's SOs, ACs, and other formally chartered community structures, including the Empowered Community.

Under this initiative, ICANN plans to track the progress of community-driven projects (e.g., number and duration of projects and activities, volume and extent of community work including meeting hours, webinars, and preparation time required) and publication of resolutions, policy recommendations, and other community decisions. We are extremely interested to learn how this tracking will be done and what metrics will be used or adopted to meet this goal.

Additionally, ICANN states that as the number of policy initiatives grows the ICANN Policy Development staff will grow as well. We are interested in learning how this will happen and also how to ease the burden on the volunteers who spend countless hours on ICANN work. We understand that the Policy Development Support function is being reorganized and we are interested in learning about the new structure and how to ensure that the new structure is the most effective way of organizing the staff. According to the advice in the budget, ICANN states that the current number of staff and available resources are unlikely to be sufficient to manage additional projects and activities and that more staff are needed. As such, it needs to better align community expectations and support needed. We are concerned that if staff are not hired in a timely manner then the Board may have to defer or reduce the number of new policy projects, which would lead to trade-offs about what policies/projects to prioritize with the available staff.

Policy Research and Stakeholder Programs

Here again to ensure that recommendations are carried out, additional staff and other resources are needed to deliver this work, as major policy efforts continue through implementation, and operational readiness work continues to support future gTLD application rounds. Increased resources are needed to support the ongoing implementation of Board-approved review team recommendations, including a number of study and research requests.

Technical Services

This function provides technical knowledge and data inside ICANN org regarding the DNS and works to maintain the security and stability of the DNS. We acknowledge that as ICANN states additional staff and resources will be ensure that the following are implemented:

- EPDP on the Temporary Specification for gTLD Registration Data Phase 2 implementation.
- Operational readiness planning to support future gTLD applications and operation.

- Increased responsibilities, e.g., CZDS, RST, Technical Onboarding re-platforming, implementing the RDAP amendment, and implementing changes related to the Registration Data Policy.

Lack of staff may delay this implementation of the recommendations and we are concerned about this issues.

Strategic Initiatives

The Strategic Initiatives functional activity leads and provides support for strategic initiatives and evolving issues that impact ICANN's remit and stakeholders. It includes supporting work undertaken by the community, such as the coordination of ICANN's strategy as it relates to compliance with the European Union's General Data Protection Regulation (GDPR) and other global data protection and privacy legislation, mitigating DNS security threats, special projects related to the New gTLD Program: Next Round, IDNs and UA-related topics, and provides general support for the Global Domains and Strategy (GDS) function.

We hope that ICANN is correct and additional resources will not be needed to complete this work and that all proposed activities are carried out as planned.

Constituent and stakeholder travel :

We look forward to the publishing of new ICANN Community Travel Support Guidelines (TSG) and hopes that there will be a specific opportunity to provide input into the TSG, the practices of ICANN's travel team, and those of the contracted travel management service provider. We look forward to providing more extensive input whenever this public comment is open. In the meantime, we call your attention to the need for more transparency in funded travelers. We understand that allocating limited travel funding among ICANN community members requires prioritization and each of the Constituencies and SO/AC works on these issues to provide ICANN with a list of all funded travellers. Travel Support Guidelines should be updated on a regular basis.

Additionally, for several travelers it takes many months to get a visa and sometimes people are not successful but this often happens too late to substitute another funded traveler so we ask that the process start sooner so that people could get the visas needed. Also, if these visas cannot be obtained there is additional time to substitute another traveller.

Additionally, we might need to revise the way visa letters are issued, especially for funded travellers. Time and again we hear stories of funded travellers finally receiving appointments and then appearing in the embassy only to be turned away because of that embassy's particular bureaucracy, requirements and need for specificity. Many people spoke about how embarrassing it is. How some Embassies ask who is funding you or other questions. We understand that ICANN is dependent on the host country for assistance, but certain small things could be done to help smooth out the process. For the funded travellers, ICANN travel can issue specific letters specifically stating the person's name and that ICANN is paying for this person's flight, their hotel (give a name) and the dates as well as providing a per diem for their days in the country. This way when funded travellers appear at the embassy they will have all the paperwork that the embassy needs and will not get turned away.

We also call attention to the travel and meeting expenses in the budget which are calculated to be 13 million USD for FY 25 and for the next 5 years, but all indications are that travel costs are increasing, often significantly and this does not seem to be accounted for. Is the Org anticipating meeting any shortfalls with staff travel cuts? Or does it mean that less ICANN staff will be travelling?

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We are interested in learning how ICANN Org will be tracking what it is calling “meaningful stakeholder participation increases” and hope these metrics are fully transparent and accountable .

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ICANN FY25 Budget:

We appreciate the Budget breakdown by activity, and especially inside each activity, in this way it is easier to understand where the money is allocated.

One of our concerns is with the actual budgeted cost of handling both the Supplemental Fund for Implementation of Community Recommendations (SFICR) and the ICANN Grant Program. The cost of handling the SFICR Fund is about 2 million USD, but it seems the only function actually budgeted for is for the New gTLD program, what other uses will the SFICR fund be used for? Moreover, it is unclear whether this fund will be replenished once the New gTLD process gets going and begins on generating money where this money will go? Will it be given back to the SFICR or remain with the new gTLD fund.

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IANA FY25 Budget:

Within the IANA FY25 budget, we note the following Financial assumptions:

The IANA FY25 Budget is \$11.5 million, of which \$10.9 million is for PTI to perform the core IANA services and \$0.6 million is for IANA support activities that are not performed by PTI. The FY25 PTI Budget is \$0.4M higher than the FY24 PTI Budget, primarily because of additional staff, an increase in personnel costs to address inflation, incremental administration for rent and other facility costs, and an increase in capital expenses as ICANN org prepares for the next Key Signing Key Rollover. These increased costs are partially offset by lower professional services expenses from a reduced need for third-party contractors. The IANA support activities component is relatively flat, compared to the FY24 IANA Budget, due to consistent support requirements.

We appreciate that inflation is being taken into account this year in the FY25 IANA budget. We also highly appreciate the decrease in Professional Services and the increase in Full Time Equivalent personnel since these are core functions in ICANN and should be carried out by ICANN org staff.

Conclusion:

In conclusion, we appreciate the opportunity to comment on the Draft ICANN FY25-29 Operating and Financial Plan, Draft ICANN FY25 Operating Plan and Budget, and the Draft IANA FY25 Operating Plan and Budget. We would like to recognize the tremendous effort that ICANN ORG, in particular the ICANN ORG Planning Team, has devoted to developing this cross-functional financial and operational plan for the ICANN Community to review and on which to provide input. We greatly also appreciate the breakdown and small table of contents in each of the sections and the clickable links provided are extremely helpful with a document that is 255 pages long.