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AT-LARGE ADVISORY COMMITTEE
IANA 2030 Strategy: Draft PTI Strategic Plan covering 2025 to 2030

Preamble

On 26th November 2024, the Public Comment proceeding opened for the **IANA 2030 Strategy: Draft PTI Strategic Plan covering 2025 to 2030**. An At-Large workspace was created in preparation for this Public Comment submission. The At-Large Operations Finance and Budget Working Group (OFB-WG) reviewed the [reference material and documents](#) relating to the **IANA 2030 Strategy: Draft PTI Strategic Plan covering 2025 to 2030**, establishing from a presentation of key points from that review that it would be in the interest of end users to develop and submit an ALAC Public Comment Statement based in the consensus created by At-Large (via the activities of the OFB-WG) for consideration and if agreed ratification by the ALAC.

The Operations Finance and Budget Working Group (OFB-WG) met on December 19th, where they agreed on a set of initial points based on the review of the Draft PTI 5-year Strategic Plan that, based on consensus, would form the framework for the public comment response from the ALAC / At-Large.

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Ratification Record

On 26th November 2024, the Public Comment proceeding opened for the **IANA 2030 Strategy: Draft PTI Strategic Plan covering 2025 to 2030**. On December 12th, the OFB-WG called for a Small Team to be created to review this matter and present a set of points to the OFB-WG for the possible development of comment at its meeting on December 19th *if* there was an agreement to respond to this public Comment; Penholders listed (in Alpha order) for this work were Satish Babu, Pari Esfandiari, Nkoro Essang Nkora, Cheryl Langdon-Orr and Shah Zahidur Rahman presented the initial points for the ALAC/At-Large statement during the December 19th call and then worked offline in a collaborative document to prepare a First Draft Statement for presentation at the OFB-WG call on January 9th.

The OFB-WG (inclusive of all ALAC Members), having established it would be in the interest of end users to develop and submit an ALAC statement for this Public Comment proceeding, reviewed and commented on the First Draft Statement and finalised drafting for endorsement by the OFB-WG at its call on January 23rd passing it on then for the ALAC endorsement/ratification.

The ALAC Chair, Jonathan Zuck, requested that the ALAC ratify the Public Comment Statement in an online vote between January 24th and 28th before submission to the ICANN Public Comment feature by Staff on January 29th.

On January 28th, staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 out of 15 votes in favour. 0 votes against, and 0 abstentions. Please note that 100 % of ALAC members participated in the poll. The ALAC members who participated in the poll are Aziz Hilali, Bukola Oronti, Claire Craig, Eunice Alejandra Perez Coello, Emilia Zalewska-Czajczynska, Jonathan Zuck, Kathleen Scoggin, Natalie Tercova, Judith Hellerstein, Justine Chew, Lilian Ivette De Luque, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu, Shah Zahidur Rahman. You may view the results here: <https://tally.icann.org/cgi/results?e=7ac4310cae2>

End-User Impact Assessment:

Commenting on this IANA 2030 Strategy and Draft PTI Plan covering 2025 to 2030 is a fair and reasonable expectation for the ALAC as an ICANN Advisory Committee precisely because, as stated in the PTI Bylaws “... *Prior to adopting the plan, the Bylaws state that PTI shall consult with the Supporting Organizations and Advisory Committees, as well as the Registries Stakeholder Group, Internet Architecture Board, and Regional Internet Registries, in the development and updating of the Strategic Plan...* “ Failure of the IANA functions performed to implement the 2030 Vision “...***To foster an Internet that works seamlessly everywhere through the reliable coordination of unique identifiers, that adapts and innovates to meet evolving community needs...***” would affect Internet End users due to the associated erosion of the stability and security of the DNS; as stated in the Draft “... and failure to meet the proposed objectives outlined in the plan, particularly with the timely and appropriate assessment of emerging technologies, as identified in the risks section of the ‘Innovation’ focus area will result in reputational harm for IANA and ICANN “... *If new technologies fail to deliver the expected improvements or negatively impact service performance, IANA risks losing the trust of key stakeholders and customers, potentially damaging its reputation and perceived reliability...*”

Initial points discussed and agreed upon by the Working Group as a basis for consensus on this Call for Public Comment:

Regarding the IANA 2030 Strategy: Draft PTI Strategic Plan Covering 2025-2030, the OFB-WG proposes that the ALAC/At-Large response to the Call for Public Comment on the draft notes strong support/consensus and focuses primarily on the following agreed points.:

- ☒ Complement the process of identification of both PTI's Strengths and weaknesses in advance of and complementary to the development of the PTI 2025-2030 Strategic Plan
- ☒ Support the proposed three focus areas in the 2030 Strategy: Innovation, Operational Excellence, and Community Engagement.

- ☑ Our community is particularly keen on the focus on the Objectives and Goals associated with IANA's proactive assessment of the ***"...emerging needs, act quickly to implement innovation solutions, and mature our management practices..."***
- ☑ This could be implemented with minimal pressure on existing staff and resources by partnering with similar activities undertaken in other [expert] parts of ICANN.
- ☑ As in previous years, we continue supporting the pursuit of Operational Excellence to "...Achieve and maintain operational excellence through staff development, streamlining processes, and evolving continuous improvement best practices..."
- ☑ Similarly, we support the notion of conducting a more progressive style of 'Community Engagement' *"... through enhancing existing relationships with the IANA customer community and improving communication strategies with non-traditional stakeholders..."*
- ☑ Also, as stated in some of the ALAC/At-Large's comments on IANA's PTI Strategy, we remain concerned that sufficient budgeting is allocated annually to avoid failing to reach the KPIs due to insufficient timeliness and/or resourcing.

The ALAC and At-Large Community Comments

Notes for inclusion in the comments to include more detailed text, etc., on at least the following agreed points:

- Complement the process of identification of both PTI's Strengths and weaknesses in advance of, and complementary to the development of the PTI 2025-2030 Strategic Plan
- Support the proposed three focus areas in the 2030 Strategy: Innovation, Operational Excellence, and Community Engagement.
- Our community is particularly keen on the focus on the Objectives and Goals associated with IANA's proactive assessment of the ***"...emerging needs, act quickly to implement innovation solutions, and mature our management practices..."***
 - This could be implemented with minimal pressure on existing staff and resources by partnering with similar activities undertaken in other [expert] parts of ICANN.
- The ALAC encourages tying PTI goals and actions to SDGs, to highlight its contributions to global priorities while reinforcing its relevance and leadership in Internet governance.
- As in previous years, we continue supporting the efforts to "...Achieve and maintain operational excellence through staff development, streamlining processes, and evolving continuous improvement best practices..."
- Similarly, we support the notion of conducting a more progressive style of 'Community Engagement' *"... through enhancing existing relationships with the IANA customer community and improving communication strategies with non-traditional stakeholders..."* To this end, we draw attention to the ALAC's comment on Community Engagement on the 2025-30 Strategy,

where we have suggested higher visibility in the community for the PTI Board at, for example, ICANN public meetings.

- ALAC/At-Large also assumes that “*non-traditional stakeholders*” refers to ‘other than PTI customers’ but seeks clarification on this terminology.
- Also, as stated in some of the ALAC/At-Large's comments on IANA's PTI Strategy, we remain concerned that sufficient budgeting is allocated annually so *that* the KPIs designed to be reached fail due to insufficient timeliness and/or resourcing.

General Comments on the PTI FY25 Strategic Plan and Budget

The plan demonstrates a strong foundation in Innovation, Operational Excellence, and Community Outreach. It outlines several commendable initiatives, including a proactive approach to addressing global Internet challenges that align with SDGs, fostering a sustainable and resilient digital ecosystem.

However, it could benefit from further refinement to maximize its impact and secure IANA's continued leadership and relevance in Internet governance. Below are the ALAC comments and suggestions in the three key areas of focus:

1. Innovation:

The strategic plan rightly emphasizes technological advancements to improve IANA's technical systems and address the evolving Internet ecosystem. By actively engaging with innovators and adopting AI-driven capabilities, PTI supports the goals of SDG 9, promoting innovation and technological resilience for a stable and inclusive Internet. However, the strategy will benefit from expanding its scope to ensure it remains relevant and effective in a rapidly changing digital landscape.

The rise of alternative namespaces, such as blockchain-based domains and decentralized DNS systems, represents both an opportunity and a threat to the stability and interoperability of the global Internet. While Goal 1.1 mentions monitoring these technologies, **a more proactive approach is critical to maintaining IANA's central role in global Internet governance, i.e. its coordination of the Internet's globally unique identifiers.** Without proactive engagement, alternative namespaces may develop in isolation, creating fragmented ecosystems that undermine the universal interoperability of the Internet. By collaborating with innovators in this space, IANA and ICANN can position themselves as leaders in fostering secure and cohesive solutions that align with global Internet governance principles.

Actionable Suggestion:

Establish dedicated task forces or partnerships to actively collaborate with developers of alternative namespaces, ensuring alignment with DNS security and universal acceptance principles. This approach will mitigate fragmentation risks and position PTI and ICANN as forward-thinking leaders addressing cutting-edge challenges.

Goal 1.1

Initially, establish the risks posed by alternative roots. However, it states, "Active monitoring and evaluation of these developments, **and adapting IANA operations accordingly**, are required to ensure

the ongoing stable operation of the Internet." This appears to be a risky strategy unless extensive education of end-users is provided, as there may not be easy ways of distinguishing between the DNS and alternative roots (Footnote: The change in the approach towards alternative roots was earlier articulated in the ALAC-SSAC meeting at ICANN81 as an initiative from ICANN OCTO).

Actionable Suggestion:

While PTI should monitor these new developments, it should endorse them only with appropriate mitigation measures to help end-user communities understand the risks of treating these emerging technologies as equivalent to the DNS.

Goal 1.2

Discusses implementing technology-driven solutions, but it does not clearly articulate how they will future-proof IANA's functions against emerging technological trends such as artificial intelligence (AI) and new authentication standards. The Internet's rapid evolution demands robust systems adaptable to unforeseen challenges. For instance, integrating AI-driven capabilities can enhance operational efficiency and improve real-time decision-making, while advanced authentication methods beyond passkeys could address evolving security threats. Failure to anticipate these advancements risks IANA falling behind as technologies and user expectations progress.

Actionable Suggestion:

Clearly outline in the strategic plan how IANA will prepare to integrate emerging technologies, such as AI-enhanced operations, AI governance challenges that may address the security of critical internet resources, such as that malicious actors can now rely on AI to support cybersquatting and next-generation authentication standards. IANA can secure its role as a trusted, adaptive authority in Internet governance by doing so.

Goal 1.3 Positioning as a Leader in Global Internet Challenges

Beyond internal technological enhancements, IANA should use its innovations to address broader Internet challenges, such as DNS security, universal acceptance, and interoperability across emerging technologies. The global Internet community considers ICANN and IANA pillars of stability and leadership. By explicitly tying technological innovations to solutions for global challenges, IANA reinforces its relevance and secures stakeholder trust. Furthermore, addressing interoperability issues proactively reduces risks of fragmentation while fostering collaboration with emerging technological sectors.

Actionable Suggestion:

Develop a communication and implementation strategy that links IANA's technological advancements to global Internet challenges. This could include publishing 'thought leadership' pieces, hosting collaborative forums, and driving initiatives addressing universal acceptance and emerging interoperability issues.

2. Operational Excellence:

The plan demonstrates a strong commitment to standards through audits, surveys, and process improvements while the focus on staff training and operational improvements aligns with SDG 4, ensuring continuous learning, and SDG 16, fostering accountability and trust in IANA as a global

institution. However, the strategic plan must address emerging challenges. Measurable KPIs, staff training in new technologies, efficiency gains, and addressing alternative namespaces are critical for IANA's resilience, adaptability, and continued trustworthiness in a rapidly evolving Internet landscape. Prioritizing these steps is essential for securing IANA's future relevance and reliability.

Goal 2.1 Establishing KPIs:

The strategic plan lacks clear operational KPIs for measuring and demonstrating service improvements. Metrics like processing times, system availability, and customer satisfaction enhance transparency, accountability, and stakeholder trust.

Actionable Suggestion:

Develop and publish detailed KPIs tied to operational goals, such as faster DNS request processing and improved system uptime, with regular performance updates as indicated by SLA maintenance and periodic performance reviews.

Goal 2.2 Staff Training:

The plan discusses staff training but lacks emphasis on training staff in emerging technologies. Integrating new technologies can introduce complexity and risks if staff are not adequately trained. AI, for instance, could streamline operations, but without proper understanding, it could also lead to errors or vulnerabilities.

Goal 2.3 points to the need for training, including in emerging technologies. Given the unique nature of skills required to manage the root and the difficulties in replacing existing Staff should the need arise, a more comprehensive skill development plan for Staff may be helpful to PTI to ensure resilience. While the Draft Plan does not provide any further details on staff development, it may be suitable for PTI to consider a more nuanced staff development strategy, mainly if AI is also part of the matrix.

Actionable Suggestion:

Incorporate training programs focused on emerging technologies that offer hands-on workshops. Highlight the specific operational benefits of this training, such as reduced error rates or quicker adoption of new systems.

Goal 2.3 Addressing the Impact of Alternative Namespaces:

IANA must proactively address the risks alternative namespaces pose to its core functions, including potential conflicts with the DNS Root Zone and operational stability. Without action, such challenges could lead to fragmentation and reduced trust in IANA's authority.

Actionable Suggestion:

Develop a framework to assess and mitigate risks while maintaining interoperability and trust.

3. Community Outreach:

The strategic plan highlights engagement with established stakeholders such as top-level domain managers, RIRs, and the IETF. While commendable, the absence of a robust strategy for reaching non-traditional and underserved groups limits IANA's potential to broaden its impact and ensure

equitable participation in Internet governance. Addressing this gap is essential for fostering inclusivity, enhancing trust, and maintaining relevance in an evolving Internet landscape. By improving engagement with non-traditional stakeholders and fostering partnerships with academic and research institutions, PTI contributes to SDG 10 and SDG 17, promoting equitable participation and collaboration in Internet governance.

Goal 3.1 Education on Alternative Namespaces:

As alternative namespaces emerge, educating the community about their risks and benefits is critical. Without proper guidance, stakeholders might underestimate cybersecurity threats or interoperability challenges, leading to fragmentation and end-user harm. IANA must lead in protecting its stakeholders' capacity building and the broader Internet ecosystem. This initiative aligns with IANA's mission of ensuring a stable and secure Internet.

Goal 3.2 Alternative Namespace Dialogue:

Actively engaging with research institutions and academia working on alternative namespaces is essential for fostering collaboration and shared governance. Hosting workshops or sessions during ICANN meetings will position IANA as a thought leader, promoting open communication and mutual understanding. This proactive stance reduces the risk of conflicts and ensures alignment with global Internet governance principles.

Goal 3.3 Visibility of PTI Board:

The PTI Board's near-invisibility during ICANN meetings represents a significant missed opportunity to enhance transparency and trust. The PTI Board is almost invisible in ICANN meetings. Given that the ICANN Board, as well as every other AC/SO, are very active during ICANN meetings and get to meet with each other as well as the broader community, it is somewhat unclear why the PTI Board is kept out of ICANN meetings, especially given the criticality of its role.

Actionable Suggestion:

Noting that the IANA Functions Review--a relatively arcane technical process--is available for reporting during ICANN meetings, a public session in which the PTI Board interacts with the community may help achieve the goal of enhancing community engagement. Regular engagement sessions with the broader ICANN community, including At-Large representatives, are critical. These sessions would provide a platform for the PTI Board to communicate directly with stakeholders, strengthening relationships and showcasing IANA's commitment to accountability. This increased visibility aligns with the strategic goal of enhancing community engagement and solidifies trust in PTI's role within Internet governance. Similarly, dedicated sessions with research institutions and academia are recommended to deepen the community's understanding of emerging risks and foster informed, collaborative discussions on potential solutions.

Overarching Comments:

Regarding Innovation:

The need for innovation to enhance the operational agility of the unique identifier system is well articulated in the Draft Plan. A new element somewhat at variance with the approach so far is in Goal 1.1, which initially establishes the risks posed by alternative roots. However, it states, "Active monitoring and evaluation of these developments, **and adapting IANA operations accordingly**, are required to ensure the ongoing stable operation of the Internet." This appears to be a risky strategy unless extensive education of end-users is provided, as there may not be easy ways of distinguishing between the DNS and alternative roots (Footnote: The change in the approach towards alternative roots was earlier articulated in the ALAC-SSAC meeting at ICANN81 as an initiative from ICANN OCTO).

While PTI should monitor these new developments, it should endorse them only with appropriate mitigation measures to help end-user communities understand the risks of treating these emerging technologies as equivalent to the DNS.

Regarding Operational Excellence:

Maintaining Operational Excellence has been identified as a critical prerequisite for achieving PTI's mission. These goals identify continuous monitoring of performance, assessing existing processes for automation and efficiency improvements (which perhaps includes AI, although it's not explicitly mentioned), and cross-training and professional development. In particular, Goal 2.3 points to the need for training, including in emerging technologies.

Given the unique nature of skills required to manage the root and the difficulties in replacing existing Staff should the need arise, a more comprehensive skill development plan for Staff may be helpful to PTI to ensure resilience. While the Draft Plan does not provide any further details on staff development, it may be suitable for PTI to consider a more nuanced staff development strategy, mainly if AI is also part of the matrix.

Regarding Community Engagement:

The draft Plan identifies Community Engagement as an important part of the future, which is correct. In particular, Goal 3.2's emphasis on "Leverage long-standing relationships with the community to drive innovation and maintain the trust in IANA as the proper home for enabling global interoperability through unique identifier coordination" is well aligned with the perspectives of the ICANN community.

However, the PTI Board is almost invisible in ICANN meetings despite this position. Given that the ICANN Board, as well as every other AC/SO, are very active during ICANN meetings and get to meet with each other as well as the broader community, it is somewhat unclear why the PTI Board is kept out of ICANN meetings, especially given the criticality of its role. Noting that IANA Functions Review--a relatively arcane technical process--is available for reporting during ICANN meetings, a public session where the PTI Board interacts with the community may help achieve the Goal of enhancing Community Engagement.