The Intellectual Property Constituency (IPC) appreciates the opportunity to comment on the ICANN FY27–31 Operating & Financial Plan.

The Draft FY27 Budget shows ICANN Operations expenses holding steady (Personnel costs ~$93M, Non-Personnel ~$59M) with *Policy Implementation* (including Contractual Compliance) budgeted at $27M (Contractual Compliance appears to be 23% of that or $6.2M). The Operating Plan's *Contractual Compliance* section notes that ICANN's Compliance team enforces community-developed policies in contracts and is preparing for greater demands. It explicitly warns that complaint volume and complexity may rise, requiring reprioritization or additional staff to handle the load. The IPC notes that DNS abuse is increasing, and new GNSO policies on DNS abuse will soon add significant compliance duties. While the plan flags this as a risk, it is unclear if the FY27 Budget provides extra resources (e.g., funding for more personnel or tools) to address the anticipated uptick in DNS abuse enforcement. The IPC urges ICANN to confirm whether ICANN Compliance function's budget accounts for an expanded workload (e.g., enhancing abuse monitoring, hiring additional compliance staff, or improving automation) needed to effectively implement forthcoming DNS abuse measures.

Given the GNSO's ongoing work on DNS Abuse mitigation, the IPC is concerned that there is a gap between policy ambition and resource allocation. We see that ICANN's DNS Abuse Mitigation Program (run by the GDD Accounts & Services team) will continue outreach, tooling, and industry collaboration. But on the enforcement side, the plan only generally states that if complaints surge or new requirements launch, ICANN may need additional staff in Contractual Compliance. The IPC believes ICANN must proactively budget for bolstered Compliance capacity (staffing, training, and systems) to handle the expected increase in DNS abuse cases and new policy enforcement. This will ensure the intent of new DNS abuse policies is met with effective compliance action and not limited by resource constraints.

The FY27–31 Operating Plan explicitly addresses the work stemming from the Expedited Policy Development Process (EPDP) on gTLD registration data (WHOIS). It confirms that ICANN will continue running the interim Registration Data Request Service (RDRS), which is the system for registration data queries, throughout FY27 (and up to Dec 2027 if needed) until a long-term System for Standardized Access/Disclosure (SSAD) is implemented. The plan also notes that ICANN org will support any additional policy development or implementation efforts for SSAD once the community and Board finalize those recommendations. This indicates ICANN is aware of the ongoing costs and staffing required to operate the RDRS and to eventually stand up the SSAD. For example, the plan's Data Protection/Privacy section highlights managing the EPDP Phase 2 recommendations and tracking the RDRS as a strategic initiative in FY27.

From an IPC perspective, it is crucial that the FY27 Budget fully accounts for the resources needed to carry out these EPDP-related activities. We are encouraged to see the Operating Plan commit to maintaining the RDRS in the interim and preparing for a future SSAD. Operating the RDRS will incur technical, staffing, and possibly contractor costs, and moving to an SSAD (should it be approved) would involve significant implementation work (software development, onboarding users, legal compliance). The documents imply these efforts fall under ICANN's Strategic Initiatives and GDS work, but they do not break out a specific dollar figure or headcount increase for them. Given that the Board directed RDRS to continue and may green-light a new SSAD system, the IPC wants to ensure the FY27 Operating Plan & Budget have allocated sufficient funds and personnel for: (a) operating the RDRS in the interim (keeping the system running, handling user support, and processing data requests), and (b) developing and implementing the SSAD if/when approved (including any necessary ramp-up of ICANN org staff or contracting of technical infrastructure). Any shortfall in resources here could delay policy implementation or undermine the effectiveness of the SSAD once launched.

In other words, does the Draft FY27 Budget and Operating Plan explicitly provide for the additional costs and staffing required by the EPDP Phase 2 implementation? In particular, have resources been set aside to maintain the RDRS through FY27 and to begin building out the SSAD (or an equivalent system) in the event the Board and GNSO reach agreement on its implementation? The IPC seeks confirmation that ICANN has budgeted adequately for such efforts – for example, funding for the necessary IT development, project management, and legal expertise – so that the interim registration data access service runs smoothly and the community can transition to an eventual SSAD without undue financial or staffing hurdles. If these costs are buried in broader budget lines, the IPC requests transparent assurance that ICANN recognizes the scale of the SSAD project and has a plan (and budget) to ramp up operationally for this new system in FY27 and beyond.