NCSG Comments on Draft ICANN FY27–31 Operating & Financial Plan and FY27 Budgets

About NCSG

NCSG represents the interests of non-commercial domain name registrants and end-users in formulating the Domain Name System policy within the Generic Names Supporting Organisation (GNSO). We are proud to have individual and organizational members in over 160 countries, and as a network of academics, Internet end-users, and civil society actors, etc, we represent a broad cross-section of the global Internet community. Since our predecessor's inception in 1999, we have facilitated global academic and civil society engagement in support of ICANN's mission, stimulating an informed citizenry and building their understanding of relevant DNS policy issues.

About this Public Comment Proceeding (Background)

https://www.icann.org/en/public-comment/proceeding/icann-fy2731-operating-financial-plan-icanniana-fy27-op-plans-budgets-16-12-2025

ICANN's overall planning process has three components:

Five-Year Operating and Financial Plan: The Five-Year Operating and Financial Plan articulates the feasibility and timing of services, activities, and milestones identified to achieve the Strategic Plan's objectives and goals. It is intended to serve as an overarching, holistic view of the activities ICANN is undertaking, or will undertake, in support of the Strategic Plan to carry out ICANN's mission in the public interest over the next five years. Article 22, Section 22.5 of ICANN's Bylaws requires the preparation and adoption of a Five-Year Operating Plan at the beginning of each fiscal year.

Annual Operating Plan and Budget: Informed by the Five-Year Operating and Financial Plan, the Annual Operating Plan and Budget further clarifies specific activities and resources. It sets forth the focus of efforts and organizational commitments for the current fiscal year. ICANN's Annual Operating Plan and Budget includes the IANA and PTI Annual Operating Plan and Budget. Article 22, Section 22.4 of ICANN's Bylaws require the preparation and adoption of an Annual Operating Plan and Budget prior to the start of each fiscal year.

1. Introduction and Overall Assessment

The Non-Commercial Stakeholder Group (NCSG) appreciates the opportunity to comment on the Draft FY27–31 Operating & Financial Plan and the FY27 Budget. While we recognize the emphasis on financial sustainability and reserve adequacy, we are concerned that the draft plans do not sufficiently articulate how resources will be deployed to sustain meaningful civil society participation. Financial sustainability must be matched by participatory sustainability.

We reiterate that the sustained engagement of the NCSG in ICANN's Policy Development and Implementation Processes constitutes essential governance infrastructure. In this context, we note the significant allocation to the Community & Engagement functional activity and request clearer articulation regarding how these resources directly enable effective participation by non-commercial stakeholders.

2. High-Level Financial Priorities

A. Community Support and Capacity Building

Enhanced Travel Support: We strongly advocate for maintaining robust funding for travel support, particularly for members from the Global South. We request a clear breakdown of the "Travel Support" budget for FY27 compared to pre-pandemic levels (FY19), adjusted for inflation.

Outreach: We support increased allocation for outreach targeting academic and philanthropic organizations to diversify GNSO perspectives.

Transparency: ICANN should provide clearer functional-level visibility on expenditures related to Policy Development Support and Community Engagement to ensure these enabling functions are protected. ICANN should publish funded participant distribution by region and stakeholder group, together with multi-year participation continuity metrics for sustainability.

B. Policy Development Support and Staffing

Resource Allocation: We request confirmation that sufficient staff are allocated to support the implementation of Registration Data reforms and Human Rights impact assessments.

Flat Headcount Concerns: We are concerned that flat headcount figures (below 470 FTEs) may mask internal reallocations away from policy development toward administrative activities.

Privacy: We seek clarity on the budget for GDPR compliance efforts to ensure they do not compromise the privacy registrants.

C. New gTLDs and Applicant Support

Funding Floor: The NCSG emphasizes that the Applicant Support Program (ASP) must be fully funded and suggests that a "Financial Floor" be established, so that cannot be redirected to administrative costs.

Surplus Governance: ICANN must clarify how surplus New gTLD funds will be governed to ensure policy-related externalities do not strain limited policy development resources.

3. Comments on Draft PTI FY27 Operating Plan & Budget

Mission Creep: We support the focus on Security, Stability, and Resiliency (SSR) but caution against any "Mission Creep" that overlaps with broader ICANN policy functions.

Community Engagement: Given the importance of trust in the IANA functions, community engagement should be treated as a core operational requirement rather than an ancillary activity vulnerable to cost-containment.

4. Policy-Oriented Research and Supplemental Funds

Independent Research: ICANN should allocate dedicated funding for community-identified research, such as independent empirical studies on the UDRP and regional market studies, as already suggested and detailed in a separate document sent to ICANN. (see annex 1)

Middle East DNS Market Study

There is a renewed need for a comprehensive DNS market study in the Middle East as the region continues to face significant economic and geopolitical uncertainty. A study of this nature was announced several years ago but was subsequently cancelled. Given current regional dynamics and the growing strategic importance of Internet infrastructure, reviving this study is both timely and necessary.

SFICR Governance: Before expanding the Supplemental Fund for Implementation of Community Recommendations (SFICR), ICANN must establish transparent, community-approved governance rules detailing projected allocations, eligibility criteria, and reporting on fund utilization.

Human Rights Consideration Program

ICANN could consider allocating a budget line for commissioning time-bound studies that examine the human rights implications of major policy proposals, implementation frameworks, or operational systems, similar to how external economic and marketplace analyses are funded to support evidence-based decision-making. These studies would not advocate for particular outcomes but would provide structured assessments of potential impacts, affected stakeholders, and possible mitigation approaches at key stages such as issue report development or implementation design. Similar studies that were funded by ICANN was the Infermal report. We suggest allocating resources on social and human rights research impact as well. Creating a mechanism to support this type of research would give the entire community analysis, and help ensure that human rights considerations are given the same consideration that ICANN already applies to economic and technical questions.

5. Specialized Policy Annexes

I. Trademark Clearinghouse (TMCH) Requirements

Rights protection updates must not expand de facto exclusivity or undermine expressive uses of the DNS. We urge ICANN to explicitly assess and document the human rights and public-interest implications of applying these updates retroactively.

II. Board Reversal of GNSO Policy Recommendations

Reversal of an adopted policy recommendation should remain exceptional and must be predicated on material, documented new information. We request a minimum 90-day window for GNSO Council responses to allow for thorough internal consultations.

III. String Similarity Evaluation (SSE) Guidelines

We support the two-stage approach for the 2026 Round but request greater transparency regarding how the SSE Tool methodology informs panel reviews.

6. Conclusion

The NCSG remains committed to a lean, transparent, and mission-aligned budget. We urge ICANN to treat civil society participation as core governance infrastructure, not as a discretionary expense.

Annex 1:

Strategic Initiative Proposal: Independent Empirical Assessment of the Uniform Domain-Name Dispute-Resolution Policy (UDRP) for the FY26 Operating Plan and Budget

1. Strategic Context and the Evolution of Community Resourcing

The internet governance ecosystem stands at a pivotal juncture as the Internet Corporation for Assigned Names and Numbers (ICANN) transitions into the FY26–30 planning cycle. For the Non-Commercial Stakeholder Group (NCSG), the imperative to safeguard the rights of domain registrantsranging from individual non-commercial users to educational institutions and civil society organizations has never been more acute. Central to this mission is the scrutiny of the Uniform Domain-Name Dispute-Resolution Policy (UDRP), a mechanism that has governed the intersection of trademark rights and domain name registration since 1999. As the Generic Names Supporting Organization (GNSO) prepares to embark on Phase 2 of the Policy Development Process (PDP) reviewing all Rights Protection Mechanisms (RPMs), the community faces a profound "data deficit" that threatens the integrity of the policymaking process.

This document serves as a formal budget request and strategic initiative proposal submitted by the NCSG leadership to the ICANN Board and the ICANN Planning organization. It outlines the necessity for a comprehensively funded, independent empirical study of the UDRP to be included in the FY26 Operating Plan and Budget. This request marks a departure from previous funding models, responding directly to ICANN organization's strategic shift away from the stand-alone Additional Budget Request (ABR) process toward a more integrated approach where community priorities are embedded as Strategic Initiatives within the core budget.

The transition away from the ABR process, which historically handled discrete community projects, necessitates a more rigorous justification for resource allocation. The NCSG acknowledges that the ABR process often led to confusion and the submission of requests that did not meet strict criteria, resulting in a decline in approvals over recent years. However, the termination of the ABR mechanism does not eliminate the community's need for resources; rather, it elevates the requirement to demonstrate how specific funding requests align with the long-term strategic objectives of the organization. The proposal detailed herein is not merely a request for funding; it is a foundational component of the FY26 Strategic Plan's objective to "Evolve and Promote ICANN's Multistakeholder Model" by ensuring that policy development is driven by objective evidence rather than interest-group capture.

1.1 The Alignment with FY26–30 Strategic Objectives

The FY26–30 Strategic Plan identifies the strengthening of the multistakeholder model and the enhancement of organizational excellence as primary pillars.

Strategic Objective 1 explicitly calls for sustaining an inclusive approach to internet governance. Inclusivity in policy development is impossible if the evidentiary basis for that policy is asymmetric. Currently, trademark interests possess sophisticated, proprietary data regarding UDRP outcomes through expensive subscription services like Darts-ip, while non-commercial stakeholders rely on fragmented, manual analysis. This disparity undermines the "equality of arms" principle essential to fair multistakeholder dialogue.

Furthermore, the strategic goal of "Financial Sustainability" is paradoxically supported by this expenditure. "Policy debt" the accumulation of rules that are inefficient, unfair, or prone to litigation—is a significant long-term cost driver for ICANN. The Phase 1 RPM PDP was characterized by protracted, circular debates caused largely by a lack of objective data, consuming thousands of hours of volunteer time and significant staff resources. By investing in a high-quality, independent study at the outset of Phase 2, ICANN creates a factual bedrock that streamlines the PDP, reduces the duration of the working group, and ultimately saves resources. The FY26 Operating Plan emphasizes that strategic initiatives must support the achievement of the 28 strategies outlined in the Strategic Plan ; this study is the critical enabler for the strategy of "data-driven policy making."

1.2 The Necessity of Independence

A core tenet of this proposal is the absolute requirement for the study to be conducted by an *independent* examiner, distinct from ICANN organization, the UDRP service providers (such as WIPO and the Forum), and the advocacy groups that represent purely trademark or registrant interests. The credibility of the UDRP as a global dispute resolution mechanism rests on its perceived fairness. However, the current data landscape is dominated by the providers themselves, who operate in a competitive market and compete for the business of complainants (trademark owners).

Previous reviews, such as the Competition, Consumer Trust, and Consumer Choice (CCT) Review, highlighted that while ICANN has the contractual authority to collect data, it often lacks the operational mechanisms to do so effectively or neutrally. The CCT Review explicitly recommended data collection exercises that have yet to be fully realized, leaving significant recommendations in "pending" status. A study commissioned directly by ICANN org but executed by a neutral third party,such as an academic consortium or a specialized governance audit firm,is the only way to satisfy the transparency requirements of the Bylaws while addressing the skepticism of the non-commercial community regarding provider-supplied statistics.

2. The Current Data Landscape: Identifying the Deficit

To justify the expenditure of funds in the FY26 budget, it is necessary to rigorously document the deficiencies in the current information ecosystem surrounding the UDRP. The UDRP is often cited as a successful mechanism because it is fast and cheap compared to litigation. However, "efficiency" is not synonymous with "justice." The metrics currently used to tout the UDRP's success speed of decision, number of cases transferred are exclusively metrics of *complainant satisfaction*. There is a profound lack of metrics regarding *respondent fairness*, due process, and the quality of jurisprudential reasoning.

2.1 The Limitations of the Policy Status Report (PSR)

In preparation for the Phase 2 PDP, ICANN org published a Policy Status Report (PSR).[13] While a commendable effort in collating available statistics, the PSR was widely criticized by the NCSG and academic observers for being descriptive rather than analytical. It provided aggregate numbers how many cases were filed, how many resulted in transfer but failed to interrogate the substance of those decisions. For example, the PSR could report that 85% of cases result in transfer, but it could not explain *why*.

The PSR relied heavily on data provided voluntarily by the UDRP providers. This creates a selection bias. Providers have no incentive to highlight cases where their panelists failed to apply the Policy correctly or where they were accused of bias. Furthermore, the PSR lacked a qualitative dimension; it did not assess whether the "three-prong test" of the UDRP (identical/confusingly similar, rights/legitimate interests, bad faith) was being applied consistently across different providers and panelists. Without this qualitative audit, the GNSO Council cannot determine if the policy is functioning as intended or if it has drifted due to "panelist creativity" and the lack of a formal appellate mechanism.

2.2 Structural Bias in Provider Data

The market for UDRP services is a competitive one. Providers like WIPO, the Forum, the Czech Arbitration Court (CAC), and the Asian Domain Name Dispute Resolution Centre (ADNDRC) compete for filing fees. Since only the complainant (the trademark owner) chooses the provider, providers are structurally incentivized to offer a service that appeals to complainants. Academic literature and prior studies have suggested that this creates a "forum shopping" dynamic, where complainants flock to providers or specific panelists known for ruling in their favor.

Data published by providers is often marketing-oriented. WIPO, for instance, publishes the "WIPO Overview of WIPO Panel Views," which serves as a de facto case law digest. While valuable, this document represents WIPO's curated view of consensus. It disproportionately cites WIPO decisions and creates a recursive loop where WIPO's interpretation of the policy becomes the standard, sidelining alternative interpretations that might be more protective of registrant rights. An independent study is required to break this self-referential cycle and analyze the jurisprudence from a neutral standpoint.

2.3 The "Black Box" of Default Judgments

One of the most significant data gaps concerns default judgments. It is estimated that a substantial majority of UDRP cases (often cited between 70% and 80%) go unanswered by the respondent. The prevailing narrative from the intellectual property constituency is that these defaults represent "obvious cybersquatters" who have no defense. The NCSG challenges this assumption. We hypothesize that many defaults may be due to:

1. **Notification Failure:** In the post-GDPR era, Whois data is redacted. Respondents may not be receiving the complaint via email or physical mail.
2. **Process Complexity:** The UDRP rules are complex and legalistic. An individual registrant without legal counsel may be intimidated into silence.
3. **Cost Barriers:** The cost of defending a domain name often exceeds the value of the domain itself, especially if the registrant is a non-commercial user.

There is currently zero reliable data on *why* respondents default. The providers do not track "reasons for non-response." An independent study with a survey component is the only way to illuminate this "dark matter" of the UDRP universe.

2.4 Accessibility of Decision Data

While UDRP decisions are nominally public, they are published in unstructured formats (HTML or PDF) scattered across different provider websites. There is no central, searchable, machine-readable database maintained by ICANN.

- **Commercial Silos:** Private companies like Clarivate (owner of Darts-ip) have scraped and structured this data, adding valuable metadata (e.g., win rates of specific panelists). However, access to Darts-ip is prohibitively expensive for non-commercial actors and academic researchers.[17] This creates an "inequality of arms" in the PDP: trademark lobbyists come to the table armed with sophisticated data analytics, while civil society representatives rely on anecdotal evidence.
- **Research Barriers:** Academic researchers wishing to study the UDRP face significant hurdles. Building a scraper to ingest 80,000+ decisions from disparate sources is a massive technical undertaking. The DNS Research Federation has begun this work, but their resources are finite.

The budget request aims to democratize this data by funding the creation of a public-interest dataset that can be used by the entire community during the PDP.

3. Proposed Methodology: A Multi-Modal Approach

To address these deficits, the NCSG proposes a study that combines quantitative scale with qualitative depth. The methodology is designed to be rigorous enough to withstand scrutiny from all stakeholder groups.

3.1 Component A: Quantitative Text Analysis (NLP)

This component involves the ingestion and algorithmic analysis of the entire corpus of UDRP decisions (estimated at over 80,000 cases).

- **Technique:** Utilization of Natural Language Processing (NLP) and machine learning classifiers to "read" decisions.
- **Variables to Extract:**
    - **Outcome:** Transfer, Deny, Cancellation.
    - **Panel Composition:** Single vs. Three-member panel.
    - **Citation Network:** Which previous cases are cited? (Testing the circularity of WIPO precedents).
    - **Language:** Language of the proceeding vs. language of the registration agreement.
- **Goal:** To provide the first neutral, comprehensive map of UDRP outcomes across all providers, identifying statistical anomalies that suggest bias or forum shopping.

3.2 Component B: Qualitative Procedural Audit

Machine learning cannot detect subtle legal errors or failures of due process. This component requires human expertise.

- **Technique:** A stratified random sample of 500-1,000 cases, heavily weighted to include "borderline" decisions, defaults, and denials.
- **Process:** A team of legal researchers (controlled for conflict of interest) will code each case against a detailed rubric regarding the application of the three-prong test, the handling of evidence, and the treatment of respondent defenses (e.g., fair use, criticism).
- **Goal:** To assess the *quality* of justice. Are panelists ignoring valid defenses? Are they applying the "Bad Faith" criteria too broadly?

3.3 Component C: Stakeholder Experience Survey

This component targets the human element.

- **Technique:** A survey distributed to a random sample of past UDRP respondents and complainants, focusing on those who defaulted.
- **Goal:** To understand the barriers to participation. Did they receive notice? Did they understand the complaint? Why did they choose not to respond?
- **Challenge:** Reaching defaulting respondents is difficult. The budget includes funds for incentives and specialized outreach methods (e.g., working through registrars).

3.4 Component D: Comparative Governance Benchmarking

- **Technique:** Benchmarking the UDRP against international arbitration standards (e.g., UNCITRAL) and other ICANN RPMs (like the URS).
- **Goal:** To determine if the UDRP's procedural safeguards (or lack thereof) are out of step with modern dispute resolution norms.

4. Market Research and Budget Estimation

The NCSG has conducted extensive market research to develop a realistic budget estimate. We have analyzed standard rates for legal consultants, academic researchers, and data infrastructure, as well as comparative costs from previous ICANN reviews (SSR2, CCT) and the New gTLD Program.

Total Requested Budget: $385,000 USD

The following subsections detail the breakdown of this figure.

4.1 Personnel Costs: $265,000

The primary cost driver for a study of this nature is human capital. We require a mix of high-level expert guidance and labor-intensive coding.

4.1.1 Principal Investigators (Senior Legal Researchers)

To ensure the study's legitimacy, it must be led by recognized experts in internet governance and intellectual property law who are independent of the trademark lobby.

- **Market Rate Analysis:**
    - Standard salary data for "Governance Consultants" indicates an average annual salary of approximately $141,000, with top-tier consultants commanding significantly more.
    - However, project-based consulting rates differ from salaries. A senior consultant billable rate typically ranges from $200 to $400 per hour.
    - For this budget, we assume a blended "academic/non-profit" rate of **$200/hour**, which is conservative compared to commercial law firm rates ($600+/hr) but sufficient to attract top-tier academic talent.
- **Effort Estimation:**
    - Two Principal Investigators (PIs) to ensure balance and peer review.
    - Estimated effort: 400 hours per PI over the course of the 12-month study (approx. 8 hours/week).
    - Calculation: 2 PIs * 400 hours * $200/hr = **$160,000**.

4.1.2 Data Scientists (NLP Specialists)

For the quantitative component, we require technical expertise to scrape, clean, and analyze the unstructured decision data.

- **Market Rate Analysis:**
    - Data Scientists and NLP specialists command high rates. A "Cybersecurity Program Manager" or specialized technical consultant averages ~$150,000/year.
    - Hourly consulting rate estimated at **$150/hour**.
- **Effort Estimation:**
    - 300 hours for scraper development, data cleaning (a massive task given the

    inconsistent formats of WIPO/Forum data), and model training.
  - Calculation: 300 hours * $150/hr = **$45,000**.

4.1.3 Legal Coders (Junior Researchers)

For the manual review of 500+ cases, we require legal literacy but not necessarily senior expertise. This role is ideal for post-graduate law students or junior associates.

- **Market Rate Analysis:**
  - "Legal Researchers" in the US average ~$57,000/year, which translates to ~$27-$30/hour for an employee.
  - However, for short-term contract work requiring no benefits, a rate of **$50/hour** is standard to attract high-quality candidates.
- **Effort Estimation:**
  - Coding a single UDRP decision (typically 10-15 pages of legal text) takes approximately 2-2.5 hours to do accurately with double-blind checking.
  - 500 cases * 2.4 hours/case = 1,200 hours.
  - Calculation: 1,200 hours * $50/hr = **$60,000**.

4.2 Data Acquisition and Infrastructure: $45,000

Access to clean data is the biggest bottleneck. While we can scrape data, purchasing access to existing structured datasets can save hundreds of hours of cleaning time.

4.2.1 Database Licensing (Darts-ip / Commercial)

- **Analysis:** Darts-ip is the gold standard for trademark case data. They cover over 10 million cases and provide granular analytics on panelist tendencies.
- **Cost:** Commercial licenses are negotiated, but "pay-as-you-go" starts at 150 Euros for small searches. For bulk access to thousands of UDRP records for research purposes, we estimate a negotiated academic/research license fee of **$25,000**.
- **Alternative:** If a license cannot be negotiated, this line item shifts to funding additional hours for data cleaning of scraped data (see 4.1.2). The cost implication is roughly neutral.
- **Note on Free Sources:** The Lumen Database provides free API access for researchers [23], but its coverage of UDRP decisions is not as comprehensive or structured as specialized IP databases. It serves as a supplementary source, not a replacement.

4.2.2 Survey Tools and Cloud Infrastructure

- **Survey Platform:** Professional license for Qualtrics or similar secure survey platform ($5,000).
- **Hosting:** AWS/Azure costs for hosting the scraped dataset and running NLP models ($5,000).

- **Respondent Incentives:** To get defaulting respondents to answer a survey, modest incentives (e.g., gift cards) are required. Estimating $10 incentive for 1,000 targets = $10,000.
- **Total: $20,000**.

4.3 Travel and Community Engagement: $40,000

The study cannot exist in a vacuum. The researchers must engage with the ICANN community to validate their methodology and present their findings.

4.3.1 ICANN Public Meeting Attendance

- **Requirement:** The PIs need to attend at least two ICANN Public Meetings (e.g., ICANN85, ICANN86) to interface with the GNSO Council and the RPM PDP Working Group.
- **Cost Logic:** Based on standard ICANN "Constituency Travel" metrics:
  - Airfare (Economy Class): ~$2,000 (average global fare).
  - Hotel (6-7 nights): ~$1,800 ($250-$300/night).
  - Per Diem: ~$600.
  - Total per person/trip: ~$4,400.
- **Calculation:** 3 Travelers (2 PIs + 1 Lead Coder) * 2 Meetings * $4,400 = **$26,400** (Rounded to $25k).

4.3.2 Workshops and Stakeholder Outreach

- **Activity:** Organizing virtual or hybrid webinars to gather input on the study design from WIPO, the Forum, the Intellectual Property Constituency (IPC), and the NCSG.
- **Cost:** Interpretation services, professional moderation, and outreach materials.
- **Estimate: $15,000**.

4.4 Project Administration and Contingency: $35,000

4.4.1 Overhead / Indirect Costs

- **Standard Practice:** If we contract a university or a research firm, they will charge "indirect costs" (overhead) on top of the direct costs.
- **Rate:** While federal grants often have high overheads (50%+), we will cap overhead at **10%** for this contract.
- **Calculation:** 10% of ~$265k personnel costs = **$26,500**.

4.4.2 Contingency

- **Buffer:** A standard budget practice for complex projects to cover currency fluctuations (for international researchers) or unforeseen data fees.
- **Estimate: $8,500** (approx 2.5% of total).

4.5 Comparative Cost Validation

To contextualize this **$385,000** request, we compare it to other ICANN expenditures:

- **CCT Review:** The CCT Review budget included millions for administration and hundreds of thousands for specific surveys (e.g., the Nielsen Consumer Trust Survey).[12]
- **New gTLD Evaluations:** A single "Community Priority Evaluation" (CPE) costs applicants roughly **$50,000 - $80,000**. Our proposal covers a systemic review of the entire dispute resolution policy for the cost of roughly 5-6 CPE evaluations.
- **UDRP Filing Fees:** A single 3-member panel UDRP case costs a complainant **$4,000** in filing fees alone. The requested budget is equivalent to the filing fees of just 96 casesa tiny fraction of the thousands of cases filed annually.

4.6 Budget Summary Table

Cost Category	Item Description	Rate / Unit	Total (USD)
1. Personnel	**Senior Legal Researchers** (2 PIs)	800 hrs @ $200/hr	$160,000
	Data Scientists (NLP/Tech)	300 hrs @ $150/hr	$45,000
	Legal Coders (Manual Review)	1,200 hrs @ $50/hr	$60,000
2. Data & Tech	**Commercial Database Access** (Darts-ip, etc.)	License Fee	$25,000
	Survey Tools & Incentives	Platform + Incentives	$15,000
	Cloud Compute/Hosting	Server Costs	$5,000
3. Travel	**ICANN Meeting Attendance**	3 pax x 2 trips	$25,000

	Stakeholder Workshops	Virtual/Hybrid support	$15,000
4. Admin	**Indirect Costs / Overhead**	10% of Direct	$26,500
	Contingency	Risk Buffer	$8,500
TOTAL	**FY26 Strategic Initiative Request**		**$385,000**

5. Governance and Implementation Roadmap

The governance of this study is as critical as its funding. We must ensure that the funds are managed transparently and that the vendor selection protects the study's independence.

5.1 NCSG Internal Approval Process

This budget request has been developed in accordance with the NCSG Charter and Operating Procedures.

1. **Initiation:** The request was initiated by the NCSG Policy Committee (NCSG-PC) as part of its strategic planning for the RPM PDP.
2. **Financial Review:** The NCSG Finance Committee (NCSG-FC), responsible for establishing a firm financial footing and administering funds, has reviewed the estimates to ensure they meet the "reasonable fees" criteria.
3. **Executive Approval:** The NCSG Executive Committee (NCSG-EC) will formally vote to submit this request to ICANN. According to our Charter, this requires a majority vote of the EC. If the request were to be challenged, the Charter provides a mechanism for membership appeal requiring a 60% weighted vote, ensuring that this request truly represents the consensus of the stakeholder group.

5.2 ICANN Org Implementation Timeline (FY26)

This project fits the standard timeline for "Specific Review" style work, which typically spans 12 months.

- **Q1 FY26 (July - September 2025): Procurement**
  - ICANN Org issues a Request for Proposal (RFP).
  - **Crucial Step:** The RFP evaluation panel must include community

    representatives (including NCSG) to assess the independence of bidders.
  - Standard RFP timeline: 6-8 weeks from issuance to selection.
- **Q2 FY26 (October - December 2025): Methodology & Data**
  - Selected vendor delivers "Inception Report" detailing the exact sampling method.
  - Data ingestion from providers and Darts-ip begins.
  - Survey launched to maximize response time.
- **Q3 FY26 (January - March 2026): Analysis**
  - Coding team conducts manual review of the 500-case sample.
  - NLP models run on the full corpus.
  - Interim findings presented at ICANN85 (March 2026).
- **Q4 FY26 (April - June 2026): Final Reporting**
  - Draft Final Report published for Public Comment.
  - Final Report delivered to the GNSO Council and RPM PDP Working Group.

6. Risk Assessment

6.1 The Risk of Inaction

If this budget is rejected, the RPM PDP Phase 2 will proceed using only the data provided by WIPO and the Forum. This will inevitably lead to a report that validates the status quo, ignoring the systemic issues of respondent default and reverse domain name hijacking. This outcome would undermine the legitimacy of the PDP and potentially lead to the rejection of the final policy recommendations by the GNSO Council or the Board, wasting years of community effort.

6.2 Capture Risk

There is a risk that the "independent" researcher could be captured by a specific interest group. To mitigate this, the RFP must include strict Conflict of Interest (COI) disclosures, disqualifying any firm that derives a significant portion of its revenue from mass-filing UDRP complaints or representing providers.

7. Conclusion

The Uniform Domain-Name Dispute-Resolution Policy is a foundational element of the internet's trust infrastructure. It functions as a global court system for domain names, yet it operates with a fraction of the transparency and oversight expected of judicial bodies.

The NCSG submits this request for **$385,000** not as a discretionary expenditure, but as a strategic necessity. The transition to the FY26 Strategic Initiative framework offers ICANN the opportunity to align its budget with its values. By funding this independent study, ICANN will demonstrate that "accountability and transparency" are not just buzzwords, but operational principles backed by resources. We respectfully request the Board Finance Committee to include this initiative in the Adopted FY26 Budget.