



# Comment on Draft PTI FY19 Operating Plan and Budget

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**Business Constituency Submission**

**GNSO//CSG//BC**

## **Background**

This document is the response of the ICANN Business Constituency (BC), from the perspective of business users and registrants, as defined in our Charter:

The mission of the Business Constituency is to ensure that ICANN policy positions are consistent with the development of an Internet that:

1. promotes end-user confidence because it is a safe place to conduct business
2. is competitive in the supply of registry and registrar and related services
3. is technically stable, secure and reliable.

## **Overall Comment Draft PTI FY19 Operating Plan and Budget**

Overall, we wish to endorse the draft PTI budget as proposed, but have the following feedback about formatting, financial granularity, depreciated assets, and the types of the audits being proposed in the FY19 budgets.

### **Comment on Budget Formatting**

We believe the improvements to the formatting of the budgets will increase readability and understanding. We suggest incorporating the following changes:

1. List of Acronyms – Please consider adding a list of acronyms immediate after the table of contents, as this will help newcomers to the community understand the budget document better.
2. Executive Summary (ES) Section – Currently the content presented under the Executive Summary sections in the PTI budget does not actually contain an executive summary. We believe that providing an actual summation of each of the chapters will improve the readability and accessibility of the document. Kindly review the sample ES provided in the BC comment on draft IANA Budget for adaptation.

### **Other Comments**

The BC is slightly confused by the opening of the executive statement relative to consulting stakeholders about the long-term objectives of PTI. The ultimate conclusion was certainly correct - there is a need for continuity and stability in delivering the IANA functions – but we believe that this should be a baseline threshold for any PTI budget. If the PTI budget is not aligned with a focus on providing continuity and stability of IANA functions, the entire security, stability, and resilience of the Internet is put at risk.

We also suggest that increased granularity should be used when reporting the budget for PTI. Reporting on \$100K intervals is problematic for such a relatively small budget. It also leads to some anomalies within the budget. For instance, It is curious that the contingency budget is represented as \$500,000 USD for both FY18 and FY19, but there is a .9% decrease in the funding. Similarly, depreciation is noted as being reduced from \$400,000 to \$300,000, a reduction of 25%, but the listed change is 17.7%.

We note that you indicated the KMF assets have “fully depreciated” – this likely indicates that this equipment is at or near the end of its usable life. Is there a plan for replacing this equipment?

Finally, can you please clarify what types of audits are being performed on both the Registry Assignment and Maintenance Systems and DNSSec systems and processes?

We are unsure why one system is getting a SOC2 audit, whereas the other is getting a SOC3 audit. Assuming we are talking about SSAE16 SOC2 Type II audits, a SOC3 audit is simply a SOC2 audit that is presented in a simplified version for end user consumption.

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This comment was drafted by Jimson Olufuye and Jay Sudowski.

It was approved in accord with the BC Charter.