**Comment on Draft FY22-26 Operating & Financial Plan and Draft FY22 Operating Plan & Budget**

**On behalf of the Coordination Center for TLD RU (ccNSO community)**

Thank you for the opportunity to make comments on the draft operational plan and budget for FY22 and FY22-FY26. We are submitting these public comments on the Universal Acceptance area in both the Draft FY22-26 Operating & Financial Plan and Draft FY22 Operating Plan and Draft FY22 Budget with hope they can be used for further improvement and detailing of the documents.

**Draft FY22-26 Operating & Financial Plan and Draft FY22 Operating Plan:**

<https://www.icann.org/en/system/files/files/draft-op-financial-fy22-26-opplan-fy22-2020-en.pdf>

1. Operating Initiatives (page 14)

All bullet points in this section include some actions like - Monitor, Promote, Develop, Evolve, etc. - except Universal Acceptance one. We recommend to better determine and formulate the main scope of work on UA which is planned by ICANN (for example, Development and Realization of Universal Acceptance initiatives).

1. Universal Acceptance (page 38)

Section SCOPE

ICANN has been working on the UA implementation on its resources and practices for some time already. But the area doesn’t clearly state any options connected with reaching UA Readiness in the ICANN system environment. It could showcase, for example, what there were plans for meeting websites, learning sources, communication tools, etc. improvement.

There is also no special mention on any plans for TLD registries and accredited registrars engagement into the UA processes although these entities are one of the main interested parties in the UA compliance realization.

This section can also include some planning processes on how to organize the implementation of UA in all domain name registration processes, related protocols, systems, policies, etc.

Considering UA as a promotion of consumer choice and for providing broader access to end users, there are also no plans for UA awareness rising among end-user audience reflected here.

 Section STRATEGIC GOALS AND TARGETED OUTCOMES SUPPORTED

Although EAI implementation can be out of the main scope of ICANN regular work, this issue is wel-known as one of the vital for further IDN implementation and promotion, so it could be considered for inclusion as the strategic goal and targeted outcome as well.

Section HOW PROGRESS IS TRACKED

The area states that UA progress will be only documented. In comparison with other ICANN operating initiatives FY22-26 it looks very poor and uncompleted. For example, there is no any detailing on how monitor, reports and statistics, planning and preparation, policy implementation, operational readiness initiatives, etc. actions can be tracked.

The stated tracking process will cover only training work in two directions and creating public sector awareness. As for the point «The remediation of technology from FY21–24», it doesn’t explain clearly what work will be included here. All the mentioned above can help to provide clearer picture of how UA progress will be tracked.

**Draft FY22 Budget**

<https://www.icann.org/en/system/files/files/draft-budget-fy22-2020-en.pdf>

As for the Draft FY22 Budget, the main comment and suggestion here is related to how it can be determined for FY22 period if, for example, the community-based working group UASG which is pointed as the resource for realization of UA initiatives and financially supported by ICANN, has not started its Action plan and tentative budget FY22 preparation yet.