[DRAFT PTI and IANA FY22 Operating Plan and Budgets - ICANN](https://www.icann.org/public-comments/draft-pti-iana-fy22-budgets-2020-10-08-en)

27 November 2020

**Statement of the Non-Commercial Stakeholders Group**

**on the Draft PTI and IANA FY22 Operational Plans and Budgets[[1]](#footnote-1)**

1. The Non-Commercial Stakeholders Group (NCSG) welcomes the opportunity to comment on the proposed Public Technical Identifiers (PTI) Operating Plan and Budget, and the proposed IANA Operating Plan and Budget, for the coming fiscal year 2022.
2. The NCSG is the most diverse body in the Generic Names Supporting Organization, with individual and organisational members from 128 countries. As a network of individual and organisational academics, Internet end-users, and civil society actors representing the interests of non-commercial registrants, we represent a broad cross-section of the global Internet community. As a constituency made up of members of the civil society, we are concerned with the rights of non-commercial internet users and the policy development regarding gTLDs.
3. NCSG strongly supports the continued maintenance of the PTI budget to ensure continuity of service in the IANA functions. The relatively flat yearon-year approach of the FY22 budget is acceptable to NCSG as long as the IANA customers and the core maintenance of the RZMS and the other IANA functions are sufficiently accounted for in the FY22 budget.
4. As we stated in our two previous comments on PTI and/or IANA budgets, NCSG would look favourably on increasing the precision of the numbers presented in future budgetary documents. Indeed, irrespective of accounting standards, a comparatively small budget of 10 million USD (or 600 000 USD for IANA alone) would in our view require rounding up to no more than the closest 10 000.
5. In addition, several elements of the two documents under comment here are presented without definitions, explanations or in a generally obtuse way. As a not-for-profit organization accountable to its community, it is paramount that ICANN deploys the required efforts in order to properly enable that community to inform itself, produce comments and generally engage the organization on issues it deems important. This is especially important when such information is of a quantitative character. Proper communication of quantitative information requires dedicated efforts. This is not about simply finding the right amount of details to include in disclosure documents, but also about presentation choices.
6. In our two previous comments, we made similar remarks on the importance of presentation and definitions. While we observe certain improvements in explaining the roles and relationships between ICANN, IANA and PTI, there remains several lacunae, which we have outlined previously. We restate them below.
	1. Naming conventions - there is no standard usage of terms, and it appears several terms overlap each other, at least partially or completely (“Core IANA Services”, “IANA Services”, “PTI Services”, “PTI Operations”, “IANA Operations”, “PTI O&B”, “Contract Oversight and Auxiliary Services”) This makes reading and understanding difficult, if not outright guesswork. NCSG would strongly recommend the usage of defined terms, with one single term per item or concept, as is common practice in the professional services industry, with an appendix giving a list of definitions.
	2. Relationship between ICANN, IANA and PTI - these are three different entities (or group of “functions,” as far as IANA is concerned) which are easily confused. While the boxes visual is a helpful aid, the variation in language across the document undermines the usefulness of that aid. NCSG would strongly recommend an individual explanatory section, which would contain both a visual and text, both using the standardized vocabulary recommended above.
	3. Footnote (a) of Appendix A and B cannot be understood without precise knowledge of the context of the transition of IANA from ICANN to PTI.NCSG is happy to work further with the relevant persons and departments of ICANN org to find ways to improve the accessibility of future budgetary documents while meeting ICANN org’s objectives of uniform presentation.
7. Moreover, it also appears that this year’s draft budget tables (e.g. Appendix A and B of the draft IANA budget) still make use of the terms “under” and “(over)”, as well as of the additional extra under/over column on the right of FY20 actuals. NCSG maintains the language used in FY20 and prior documents was clearer and continues to believe that reverting to such language would be preferable.

Irrespective of knowledge of accounting practices, one may not understand that it is the budget numbers which are understood to be “over” or “under” either the forecast or actuals. This issue is compounded by the fact that the basis for the over/under comparison for actual is not even given. Usage of “increase” and “decrease,” as was the case in the FY20 documents and before, more directly implied that what is planned (next FY budget) is an increase or a decrease over the more certain numbers (the current FY forecast or the actuals for the previous FY). It does not suffice that one may understand the meaning of “over” and “under” by looking at the numbers and reasoning by induction. The meaning of these two terms should be obvious without looking at the numbers, and for now it is not.

Generally speaking, there are no statements regarding how the impacts of the COVID-19 pandemic were factored in the budget, if at all. While we may presume that they have, we believe a note to that effect would be in order, providing certain details as to how such impacts were considered.

1. [↑](#footnote-ref-1)