



Registries Stakeholder Group Statement

ICANN FY27–31 Operating & Financial Plan, ICANN/IANA FY27 Op Plans & Budgets

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

Documents

- [Draft ICANN FY27–31 Operating and Financial Plan and Draft ICANN FY27 Operating Plan](#)
- [Draft ICANN FY27 Budget](#)
- [Highlights of the Draft ICANN FY27–31 Operating & Financial Plan and Draft ICANN FY27 Operating Plan and Budget](#) (reference document to aid in navigating between documents)
- [Proposal for Changes to ICANN's Funds](#)
- [Draft IANA FY27 Operating Plan and Budget](#)
- [Funding Forecast Assumptions for Fiscal Years 2027–31](#) (supporting document)

Related RySG comments

RySG comments on previous Draft Plans & Budgets

- [RySG Comments on the ICANN FY26-30 Operating & Financial Plan, ICANN/IANA FY26 Op Plans & Budgets](#) (February 2025) - [ICANN Report and Feedback on public comments](#)
- [RySG Comments on the ICANN Draft FY25 Plans](#) (February 2024) - [ICANN Report and Feedback on public comments](#)

RySG comments ICANN Reserve Fund

- [RySG comment on the ICANN Reserve Fund: Proposed Replenishment Strategy](#) (April 2018)
- [RySG comment on the ICANN Reserve Fund: Rationale and Target Level](#) (November 2017)

gTLD Registries Stakeholder Group (RySG) comment

Introduction

The gTLD Registries Stakeholder Group (RySG) welcomes the opportunity to comment on the ICANN FY27–31 Operating & Financial Plan, ICANN/IANA FY27 Op Plans & Budgets.

This comment is structured as follows: the RySG first provides overarching comments on the documents and process, then comments on the Draft Proposal for Changes to ICANN's Funds, on the Draft FY27 Budget, and finally, on individual projects and budget items of concern to the RySG.

I. Overarching comments

New gTLD Next Round and ICANN's Plans and Budgets

The 2026 Round of the new gTLD Program is expected to generate a new income stream for ICANN, and we would like to understand how this will be reflected in ICANN's Plans and Budgets.

The application window is anticipated to open in April 2026 and close early in FY27, with the Application Reveal date expected toward the end of Q1 of FY27. Contracting and delegation of the first new gTLDs could happen by the end of 2027, with 2028 and following years a more realistic timeframe for most delegations.

We recognize that there are too many un-knowns to allow detailed estimations of the number of successful applications, new Registry Agreements, and the associated budgetary impact. However, given the strategic importance of the new gTLD Program, we believe that its impact should already be given attention in the FY27 and FY27-31 documents.

Concretely, we suggest that ICANN include the following elements in the documentation, and update them the coming years:

- Acknowledge that the new gTLD Program will generate a new income stream for ICANN, and clarify when ICANN expects to be able to provide informed estimates of its budgetary impact.
- Explain the methodology ICANN plans to use for its estimates and projections.
- Describe how ICANN anticipates incorporating the new revenue into its future plans and budgets, and as from when this will be visible.
- Indicate whether ICANN expects incremental increases in its operating costs following the gradual delegation of additional TLDs.

Public Comment proceeding

While ICANN has made significant improvements over time in how information is presented, concerns about the effectiveness of the public comment process remain. The volume and complexity of planning and budget materials is challenging, in particular for community members who are volunteers or who do not have a background in finance.

The *guided comment form* to facilitate commenting, does not achieve this objective. While the form makes it easier to submit a comment, it adds little value in helping the community analyze and digest the information. Several questions invite to express agreement or disagreement with large sections of the documents, rather than facilitating more granular, substantive feedback. Questions relating to the comment process and about how the information is presented may be better addressed outside the public comment proceeding, for example through a survey, to keep the public comment focused on the substance of the budget and plans.

We also note inconsistencies in how questions are framed, in some cases steering responses. For example, the form asks whether the community agrees or disagrees with the proposed changes to the Reserve Fund, while the question on the SFCIR only asks whether the community understands the reason for the proposed change, without inviting views on whether such a change is supported.

The “Proposal for Changes to ICANN’s Funds” is an important document for community consideration. Given the already high volume of materials in this public comment proceeding, we question why this document was not published earlier as a separate proceeding.

II. Comments on the Draft Proposal for Changes to ICANN's Funds

Reserve Fund

The RySG has consistently argued for a Reserve Fund capped at 12 months of operational expenditures, in combination with continuous efforts by ICANN to improve operational efficiency and strong budgetary discipline to avoid deficits.

While we welcome the introduction of a maximum for the Reserve Fund, we are concerned that the proposal intends to substantially increase the Reserve Fund without a clear and detailed rationale for why a reserve exceeding 12 months is necessary. Moreover, the proposal for a target level that adds a buffer of 25% to 50% of operational expenditures on top of the minimum lacks a clear rationale and therefore creates the impression that ICANN seeks increased flexibility in the use of the Reserve Fund.

In our view, the Reserve Fund exists first and foremost to ensure the continuity of ICANN's essential services and core activities in the event of unavoidable, unpredictable, and unplanned events, and not necessarily to cover all ICANN's operations in such events.

We invite ICANN, before taking further steps,

- to provide a clear rationale for why the Reserve Fund target level should exceed the 12-month minimum,
- to outline a clear strategy and trajectory for increasing the Reserve Fund to the proposed target level, including the sources of funding and the time frame to reach the target.

In addition, we would welcome greater clarity on the strategies and procedures ICANN has in place to respond to unavoidable, unpredictable, and unplanned events, and the circumstances in which the Reserve Fund would be used versus other measures.

Finally, we would welcome more details on the timeframe and strategy to replenish the Reserve Fund in the event that substantial amounts have been withdrawn.

Supplemental Fund for Implementation of Community Recommendations (SFICR)

The RySG recognizes that the SFICR serves a legitimate purpose. However, in order to properly assess the proposal to expand the scope of “Board-approved community recommendations” to “any qualifying project” we would like to hear from ICANN what projects are currently not being funded that would be eligible for funding from SFICR.

In the current proposal we are missing a clear definition of “any qualifying projects” and transparent criteria for how and when SFICR funds may be triggered. We would also welcome more information on SFICR minimum, target, and maximum levels.

We would also like to note that, in our comments on the FY26 Plans and Budget, we requested more clarity regarding the intention to use the SFICR to fund the New gTLD Program and how this would be reconciled with the additional resources to be generated from application fees. We have not received a response in the Report on Comments.

III. Comments on the Draft FY27 ICANN Budget

Funding ICANN Review process

The RySG highlights a disconnect between the level of resources required by the ICANN Reviews process, the ICANN FY26–30 Strategic Plan, and the [Draft ICANN FY27 Budget](#) currently out for Public Comment ([2026](#)).

ICANN FY27-31 [Strategic Objective 1](#) lists both the Pilot Holistic Review (concluded), Continuous Improvement Program as Strategic Objectives, and “broad participation in a community dialogue on reviews” as a part of these objectives. In spite of their significance, “Reviews and Strategic Initiatives” account for the lowest percentage (%) of [FY27 Community and Engagement budget](#) (USD 63M). Review Teams are currently not allocated the same resources for collaborative work as other community teams.

Further, due to issues with the timing of reviews and implementation of recommendations, the community has undertaken the work of Reviews of Reviews Cross Community Group

(ROR-CCG) to craft a lightweight, flexible, and sustainable approach to reviews, so that ICANN can make meaningful improvements as the ecosystem evolves.

To this end, the RySG encourages that ICANN provide sufficient resources in the FY27 Community and Engagement Budget to address ICANN Reviews, and suggests examining resources that may be necessary (for example: evaluation of the impact of a COO or needs identified by the ROR work) in the [Draft ICANN FY27 Budget](#), to drive successful implementation of reviews alongside the ICANN CEO, Board and Community. The RySG welcomes further community engagement on the sufficient resourcing required for this initiative.

Please refer to the RySG Feedback on the Review of Review process (linked on the [RySG webpage](#)), which reflects this input and provides further detail on RySG positions related to ICANN Strategic Initiatives, ICANN Reviews, the ICANN FY27–31 Operating & Financial Plan, and ICANN FY27 Budget.

IV. Comments on individual items of the draft FY27-31 Operating and Financial Plan and draft FY27 Operating Plan

Strategic Initiatives

Strategic Initiative 2 : Continuous Improvement Program, an Evolution of ICANN's Organizational Reviews

FY27-31: p. 12-13 / FY27: p. 120

The RySG is supportive that the Continuous Improvement Program (CIP) should progress as planned, as described in ICANN Board Resolution ([2025.05.19.02](#)) and in the published Continuous Improvement Program (CIP) Framework ([2025](#)). Specifically with regards to timeline for CIP Cycle Implementation (p. 10), and Appendix B. Guidance for Implementation of the CIP (p. 17):

“The CIP-CCG intends a CIP assessment cycle to take no longer than three years, with flexibility for each group to progress through the three phases of the CIP on a timeline that meets their needs within that period. The first CIP assessment cycle is estimated to begin in 2025 and is expected to conclude by the end of a three year period.”

The RySG is supportive of the first CIP assessment cycle to initiate in a timely manner, in accordance with the published CIP Framework (2025) and ICANN Board resolution (2025). The RySG is concerned about the disconnect between the level of resources required by the ICANN Reviews process, the ICANN FY26–30 Strategic Plan, and the Draft ICANN FY27 Budget currently out for Public Comment (2026), as explained in more detail above, and encourages that ICANN provide sufficient resources in the FY27 Community and Engagement Budget.

Strategic Initiative 6 : Academic Engagement Plan

FY27-31: p. 19-20 / FY27: p. 124

ICANN should consider other benefits to engagement with higher education students beyond that they “appreciate the value of ICANN’s work and the opportunities for a rewarding professional career.” As governments are increasingly expressing interest in directly regulating the DNS, ICANN should view its academic engagement as an opportunity to educate future regulators on the importance of an independent ICANN and stable, secure and interoperable internet.

Strategic Initiative 7 : New Skills and Leadership Training for the Community

FY27-31: p. 21 / FY27: p. 125

We look forward to receiving the results of ICANN’s assessment for support for training, education, and skill-building programs, and activities for the community later in 2026.

Strategic Initiative 8 : Developing Pathways to Community Leadership

FY27-31: p. 22 / FY27: p. 126

The RySG welcomes the restart of the ICANN Leadership Program. The Leadership Program has consistently demonstrated its value in providing valuable skills and training to ICANN SO/ACs.

Strategic Initiative 10 : Facilitating Consensus in Policy and Advice Development

FY27-31: p. 25 / FY27: p. 128

The RySG appreciates ICANN’s continued efforts toward facilitating consensus building throughout the ICANN Community and the work done thus far under this strategic initiative to bring the ICANN Community in line with international norms related to disclosure of interests.

The RySG looks forward to continuing to work with ICANN and the larger Community to continue to improve consensus building throughout our activities.

Strategic Initiative 11 : Improving ICANN Hybrid Meetings

FY27-31: p. 26 / FY27: p. 129

The RySG looks forward to continuing to engage in the “How We Meet” process. The Strategic Initiative foresees the implementation of How We Meet recommendations in Q2 2027. However, to date, only a preliminary report has been published, and no specific recommendations determined by community agreement.

We would appreciate clarification from ICANN regarding what is meant by “community agreement” in the context of this Strategic Initiative. Additionally, we question how practical it will be to both develop concrete recommendations and implement them within the indicated timeframe.

Strategic Initiative 12 : Advice Consideration Process Improvements

FY27-31: p. 27 / FY27: p. 130

This Initiative notes that it “needs to budget for staffing and resource requirements” but it is not clear whether this budget is considered in the current budget proposal. When will ICANN provide information about this budget?

Strategic Initiative 13 : Geopolitical Monitoring and Engagement

FY27-31: p. 28-29 / FY27: p. 131-132

The RySG appreciates ICANN’s dedication to monitoring geopolitical developments relevant to the community, informing and sharing updates with the community, and engaging with relevant organisations and processes.

We emphasize the importance of transparency regarding the type and level of its interactions with governments, regulators, intergovernmental organizations, and other public policy stakeholders, and of improving coordination with the community on outreach and mitigation strategies.

We encourage ICANN to coordinate with contracted parties in underserved regions to increase coordination with relevant governments and IGOs.

Strategic Initiative 14 : Policy Development and Implementation Process Improvements

FY27-31: p. 30 / FY27: p. 133

The RySG supports efforts to improve the efficiency of policy development and implementation processes, but wishes to emphasize that any changes to the Policy

Development Process (PDP) must be carefully considered and can only be made by the GNSO.

Policy recommendations can take a significant amount of time to reach the Board for consideration (for example, the Transfer PDP Final Recommendations). Such delays risk slowing the overall PDP and undermine the confidence in the effectiveness and legitimacy of the multistakeholder model.

Strategic Initiative 16 : WSIS+20 Review Project and Outreach Network

FY27-31: p. 32 / FY27: p. 134

The RySG very much welcomed the work and engagement under Strategic Initiative 16 by ICANN and the community leading up to the WSIS+20 Review in December 2025.

We note that Strategic Initiative 16 is marked as “complete,” while the document indicates that the Government and IGO Engagement team will continue to monitor and engage, as UN work with Internet Governance will be ongoing.

Continued engagement will be essential as the WSIS+20 outcomes are implemented, and we specifically encourage ICANN to continue its engagement in support of the Internet Governance Forum and its sustainability. We would welcome clarification on how this will be concretely addressed under other Strategic Initiatives.

Strategic Initiative 17 : Improving ICANN Organization Agility

FY27-31: p. 34 / FY27: p. 136

The RySG supports that ICANN becomes more agile and adjusts to changes in the market and government regulations. We look forward to the high-level action plan for this important initiative.

Strategic Initiative 19 : Evaluating ICANN’s Funding Structure

FY27-31: p. 37 / FY27: p. 138

The RySG is highly interested in this topic and looks forward to progress in this area, including the announced high-level action plan and related key activities.

Income from the 2026 Round gTLDs, once delegated, will be a driver of future funding. While we understand the rationale for not including this income in FY27 budget projections, we expect the Next Round’s impact on ICANN’s funding to be addressed in detail in the evaluation of ICANN’s funding structure under Strategic Initiative 19.

Strategic Initiative 20 : Improving Forecasting and Financial Planning

FY27-31: p. 38 / FY27: p. 138

The RySG supports ICANN improving its budget forecasting. The milestones outlined under Strategic Initiative 20 appear relatively vague and have large implementation windows. We invite ICANN to consider whether providing more specifics with designated deliverables over time, would better support meaningful community engagement in the budget public comment process.

Strategic Initiative 24 : Universal Acceptance

FY27-31: p. 44-45 / FY27: p. 143

The RySG supports the continued efforts on Universal Acceptance and IDNs. This work is of particular importance with the Next Round of new gTLD delegations approaching.

Strategic Initiative 25 : New gTLD Program: 2026 Round

FY27-31: p. 46-48 / FY27: p. 144-145

The RySG appreciates the work by ICANN org to prepare for the Next Round of new gTLDs and the progress made toward the opening of the Next Round in the last year.

Strategic Initiative 29 : Implement an IANA Long-Term Sustainability Plan

FY27-31: p. 53-54 / FY27: p. 149

The RySG expresses its general support for the implementation of the IANA Long-Term Sustainability Plan.

Strategic Initiative 30 : Regional Events Redesign

FY27-31: p. 56 / FY27: p. 151

The RySG supports the continuation of ICANN hosted regional events. They represent opportunities to reach out and engage with local and regional stakeholders who do not attend the ICANN meetings, and have a different dynamic to interact with community colleagues and stakeholders compared to the busy ICANN weeks.

The RySG greatly values the Contracted Parties Summit (CPS) and the colocation of a Board Workshop with the Summit, without overlap, allowing Board members to participate in the CPS.