DRAFT FY11 OPERATING PLAN AND BUDGET

SUMMARY AND ANALYSIS OF PUBLIC INPUT
(17 May – 26 June 2010)

ICANN's fiscal year operating plan and budget development relies heavily upon community feedback into its processes. The Summary and Analysis of public comments received on the draft Framework of the FY11 Operating Plan and Budget was posted on 10 May 2010, and the Draft FY 11 Operating Plan and Budget was posted for additional public comment on 17 May 2010. This draft plan was discussed on conference calls as well as at an open forum, in community breakout sessions during the ICANN Brussels meeting and follow up conference calls after the Brussels meeting, per the Board resolution. Community feedback was documented via online forum (public comments), via transcripts from meetings, via chat rooms, and via staff notes from meetings and conference calls. This new Summary and Analysis is a compilation and response of all of the above mentioned events and information.

Source references:
The text of the online forum public comments may be found at http://forum.icann.org/lists/op-budget-fy2011/
Transcripts from the Brussels meeting and chat discussions may be found at
http://brussels38.icann.org/node/12465 http://brussels38.icann.org/node/12510

The original Summary and Analysis from the Framework of the FY11 Operating Plan and Budget can be found at http://forum.icann.org/lists/op-budget-fy2011/

I. The Comments provided regarding the Draft (now Adopted) FY11 Operating Plan and Budget are shown below:

➢ From the IPC:
Section 4.1: New gTLD Implementation and Delegation

This budget area is slated for a spending decrease of 12% in FY11, but is still third of the 15 Organization Activities listed in the FY11 Operating Plan (p. 15) in terms of expense, at $6.68 million. Despite apparent progress, many of the new gTLD overarching issues have yet to be thoroughly addressed -- even with the recent release of version 4 of the Draft Applicant Guidebook -- and realistically might not be addressed sufficiently within FY11. Because the FY11 projected revenue is nearly even with expenses, ICANN should consider a long-term budget for gTLD Implementation and Delegation that can be spread out over several fiscal years, freeing up resources for FY11 and beyond to be used for organizational activities that in IPC's view remain underfunded, such as Contractual Compliance and better Rights Protection Mechanisms in existing and new gTLDs. Actual new gTLD program revenue and costs, including revenue and costs related to deployment and applications processing, are not reflected in the FY11 Operating Plan, but are addressed in greater detail in Section 7.

Sections 4.3: IANA and Technological Operations Improvements;
4.4: Security, Stability and Resiliency, and 4.13: DNS Operations

We commend ICANN for including in the proposed FY11 Operating Plan a substantial increase over the FY10 budget for all three of these budget items (15.2% for IANA and Technological Operations Improvements, 23.2% for Security, Stability and Resiliency, and 82.2% for DNS Operations). However, as with the FY10 Operating Plan, IPC has difficulty identifying the boundaries of these areas, as well as understanding which ICANN entities are responsible for implementation and oversight of the increased resources.

Again, these three budget areas appear to overlap substantially. For instance, the Security, Stability and Resiliency budget item includes "costs for DNSSEC implementation," but "ensuring the stability and security of the DNS" and "complet[ing] the production deployment of ICANN's DNSSEC signing infrastructure" are organized under the DNS Operations budget item, and projects involving operational requirements for

DNSSEC and other infrastructure elements are listed under the IANA budget line. ICANN released its draft Plan for Enhancing Internet Security, Stability and Resiliency (SSR) in May 2009 and its Proposed Strategic Initiatives for Improved DNS Security, Stability and Resiliency (SSR) on February 12, 2010. Both documents reinforce the impression that these three budget items overlap significantly. Clear delineation of these three budget items would allow for better community understanding of ICANN's proposed resource allocation.

Section 4.5: Contractual Compliance

IPC is happy to see some progress in this area over the past year, but again far less than appeared to be promised in the FY10 Operating Budget. For many years, IPC has been urging ICANN to implement a credible, comprehensive program to monitor compliance with, and to enforce, its contracts with gTLD registries and with accredited registrars. The entire ICANN experiment depends on using contractual agreements as a substitute for government regulation. The viability of that experiment remains in question so long as those agreements are not consistently and predictably enforced. Over the past few years ICANN has begun to bring credibility and respect to its compliance efforts, yet much more remains to be done.

The FY11 Plan asserts that there will be an increase of 6.5%, to $3.4 million, for contract compliance. Increased compliance resources are certainly necessary, but will not be sufficient to create the "culture of compliance" throughout ICANN that ICANN senior staff has told the IPC was its goal. We reiterate that more concerted efforts are needed to raise dramatically the profile of compliance issues from the viewpoint of contracted parties; to strengthen the fledgling efforts of ICANN to communicate to the public about its compliance activities; and to adopt a more strategic approach, which focuses on compliance efforts that will deliver the greatest impact for domain name registrants and Internet users.

There has been progress on some of these fronts over the past year, but the question of strategy, which is probably the most important one, appears to have advanced the least so far. Yet we appreciate that outreach efforts are increasing, including the quarterly compliance reports and increased accessibility to compliance staff. Still we look forward to working with ICANN staff over the next year to continue working towards ICANN's strategic and systemic goals.

We note that the "external ICANN contract compliance advisory council" contemplated in last year's plan seems to have been discarded, though we thought it could be of great value in evaluating ICANN's successes and shortcomings in this field, and recommending what tough steps ought to be taken to improve the track record and build the "culture of compliance". It remains our hope that such a council should be populated by reaching out to law enforcement, corporate compliance specialists, and auditing organizations, as well as experts in combating online fraud, cybercrime, counterfeiting, piracy, and similar misconduct. A council so constituted could provide a real-world, open and transparent perspective on how ICANN can do a better job of enforcing its contracts. This will be particularly important as the High Security TLD program moves forward, particularly to the extent it might be considered a certification program.

Last year we welcomed ICANN's plan to hire a Whois compliance manager, and to train and support auditors in three additional global regions. However, ICANN appears not to have followed through on that plan to date, as there is no publicly identified Whois compliance manager, and we understand that ICANN has only hired one regional auditor in Asia. In particular with respect to Whois, in light of the very clear Affirmation of Commitments on this point, ICANN needs to do MUCH more to improve the accuracy of Whois data.

The recently published Whois accuracy study seemed to have taken more than a year to produce despite its modest sample size, yet clearly indicates a widespread problem with Whois accuracy that ICANN has inadequately attempted to address over the past many years. We appreciate that ICANN lists this as the first priority in this area, and hope ICANN makes dramatically more progress on this critical issue this year, than was accomplished last year. Extra budget needs to be set aside not just for compliance functions in this area, but also for policy development.

As for the Whois data problems reporting system (WDPRS), IPC repeats the IPC's request from last year, that ICANN devote some of ICANN's public relations spending to publicizing the availability of this system among consumers, domain name registrants, anti-phishing and other anti-fraud organizations, and civil and criminal law enforcement agencies, with the goal of making its use routine, not exceptional, whenever users encounter registrant contact data that appear false.

IPC further notes the statement made last year by ICANN that "a key focus in FY10 will be asking the community to consider what contractual/policy tools are necessary to make compliance efforts even more effective and more cost efficient in the long term." There seems to have been little if any movement on this since then, though we note the second proposed focus on better IT systems and tools for the compliance team. We continue to believe there is considerable potential for advancing this goal through improved contract terms, both in the Registrar Accreditation Agreement at the registrar level, and in the various registry agreements, notably those that are being prepared for applicants to operate new gTLD registries. We welcome the proactive involvement of ICANN staff in achieving stronger contractual provisions in both these arenas.

IPC has reviewed the listed priorities in this part of the FY11 plan. Given that many of the priorities listed in the FY10 plan, and our comments on them have not been achieved, it is hard to justify a point by point analysis of ICANN's list of priorities in this area, some of which are longstanding priorities and some new.

However, we do strongly encourage ICANN to pursue the fourth listed priority with vigilance: "Manage, respond to, measure and report on the number of monthly incoming consumer complaints regarding various domain name issues, as well as, Whois data inaccuracy." This must be done in an open and transparent manner so that the data can be properly verified and acted upon. Again, this will require not only increased budget for compliance efforts, but also for policy development to prevent the harms caused to consumers and businesses, which are demonstrated by many of the complaints that are filed.

Sections 4.6 – 4.10

ICANN plans on increasing its budget for Constituency Support, Core Meeting Logistics, Policy Development Support, and Global Engagement and Increasing International Participation. ICANN and the ICANN Board have consistently emphasized the multi-stakeholder, bottom-up, community-driven and consensus-based nature of its mandate. In addition, they have highlighted the need for greater and more diverse participation throughout the ICANN community. The evolution of the GNSO from a Council-led to a working group based model will also require every stakeholder group to expend more time as well as financial and human resources than ever before.

While IPC supports increased participation in policy development, IPC believes that such participation must come from all elements of the Internet community, including registrants, Internet users, private internet businesses, intellectual property holders, etc. Yet, it appears from the specifics of the plan that ICANN is still failing to reach in any real way beyond contracted parties in its policy making process and oversight activities. While there is some lip service paid to reaching out to other constituencies, virtually all Constituency Support, Core Meeting Logistics, Policy Development support and Global Engagement activities revolve around contracted parties rather than support for activities that obtain input from or discuss current issues with representatives of other constituents such as private sector internet businesses or intellectual property owners.

We believe that a key problem with the Proposed Budget is lack of budget to promote adequate growth of the non-contracting Constituencies. We suggest that ICANN make an initial grant of $100k per year for 3 years with the availability of a further $150k in matching funds to enable the non-contracted constituencies to hire more professional help, cover travel to meetings, conduct outreach, etc. Such a grant would enable the non-contracted constituencies each to have better control over their fate, and would put them closer to par with respect to all the resources ICANN expends on such efforts for its contracting parties, including dedicated

Staff, regional meetings only of contracted parties, etc. We welcome the ICANN Board's commitment to "make adjustments to the [FY 2011] budget where appropriate in order to address the community's concerns," and look forward to working with the staff to develop concrete proposals to do so.

Except for Councilor travel to ICANN meetings, the Commercial and Non-Commercial Stakeholder Groups do not receive any funding support from ICANN, and continue not to do so under the FY 2011 Operating Plan and Budget (notwithstanding the misleading and inaccurately-titled Constituency Support section it contains). We call on ICANN and the ICANN Board to remedy this patent inequality in light of the ICANN mandate. We believe that all ICANN stakeholder groups should receive fair, equitable, adequate and non-discriminatory ICANN support.

In addition, in Section 4.8 (as well as in section 5.2.3), we note the references to "fact-based studies to support policy development processes." ICANN should clarify and ensure that this reference refers, perhaps among others, to the Whois-related studies that, after long and careful development, may be ready for implementation and thus likely require funding in FY11. We understand that, although not expressly broken out, the budget includes over $400,000 for Whois-related studies, and simply wish to ensure that such studies in fact are allocated the necessary resources to move forward, when ready.

Section 4.11: Ombudsman

This budget area is slated for a spending increase of 24.6%. The FY11 Draft Operating Plan and Budget does not provide any explanation for this substantial increase. IPC believes that an explanation should be provided in the FY11 Final Operating Plan and Budget.

Section 4.15: Administrative Improvement

The fifth largest spending increase called for in a single area is "Administrative Improvement," where a 19.4% increase to $2.2 million is foreseen. This increase is largely attributable to the "volume of reviews to be executed in a timely and efficient manner." (page 26).

It is unclear what value (if any) will be derived from these reviews. IPC is concerned about ICANN diverting resources to the reviews that could be used more productively in addressing problems with the management of the domain name system.

Section 5: The FY11 Budget

IPC believes that ICANN should be budgeting conservatively. Consequently, we believe it is a mistake for ICANN to anticipate higher FY11 registrar revenues, ccTLD revenue, and other revenues than currently forecasted for FY10. For example, ICANN has budgeted almost $2 million more in registrar revenue than it budgeted for FY10 and this amount is also almost $650,000 more than the FY10 forecast. Similarly, ICANN budgets ccTLD revenue to be the same as its budget for FY10, even though the forecast for FY10 is almost 25% below the FY10 budget. Likewise, ICANN budgets other revenue to be the same as its budget for FY10, even though the forecast for FY10 is over 33% below the FY10 budget.

Section 6: Contribution to the Reserve Fund

IPC notes ICANN's goal to adopt budgets that add approximately $10 million per year to the Reserve Fund in order to achieve the Reserve Fund target level equivalent to one year of operating expenses. Over the past two years, ICANN has adopted budgets with a $5 million annual Reserve Fund target with the expectation that the additional resources would be spent preparing the new gTLD program, and those same resources would be recouped from new gTLD application fees in order to replenish the Reserve Fund. However, as the new gTLD program and application process are expected to be revenue-cost neutral (p. 53), it is unclear how ICANN will affect this plan.

As further delays to the new gTLD program are foreseeable, we generally caution ICANN in relying on recouped resources from application fees, and to consider this in "fine-tuning" the determination of the appropriate level for the Reserve Fund.

➢ From Chuck Gomes (in his own personal capacity):

*Note that all text in italics are the actual comments to either questions provided in Draft FY11 Plan or actual documentation from the FY11 Draft Operating Plan and Budget.

Introduction: Questions for Feedback

Note that I respond briefly here to some of the general questions asked at the beginning of the FY11 Draft Operating Plan and Budget. For more detail to support the brief answers below, please refer to the Detailed Comments Section.

Are there specific deliverables or commitments that require more clarity?
- *A large percentage of projected commitments need much more detail. Without more breakdown of large expense categories into main expense components, it is not possible to determine whether the commitment can be adequately met or not.*

Are the organizational activities prioritized properly? Does one activity or another require more resources and, if so, what other activities should be delayed or eliminated to fund the more important activities?
- *Additional increases in the Reserve Fund should be delayed so that cutbacks in operational expenses can be reduced. New gTLD application fees should be reduced before already spent development funds are put into the Reserve Fund.*

Is the contribution to the Reserve Fund enough? Are revenue sources appropriate, and set at the right level, in the context of existing expectations by the Internet community?
- *The Reserve Fund is enough until overall economic conditions improve. It is not appropriate that over 94% of revenue come from gTLD sources.*

What about the process for developing ICANN's plans? Are they sufficient to accomplish the goals to be accountable and transparent? In Section 3, an alternative schedule for developing the fiscal year plans is proposed? Is this proposal preferred?
- The lack of detailed breakdown of costs does not contribute to accountability and transparency. The proposal to divide the planning cycle into three four month periods with the middle (Framework) period allowing for more SO/AC input could be an improvement but only if a lower level of cost breakdown occurs in first the Framework period and most importantly in the Feedback period.

ICANN's commitment to openness and transparency will reinforce efforts of recent years to post detail-rich budget documents. This draft contains more analysis and detail than contained in any prior year. This level of detail is provided based on feedback and requests from the community. Are we striking the right balance between the need for detail versus the time to prepare and digest that detail, and the relevance of such information? For the Operating Plan and Budget development effort, are we responsive to the call for accountability and transparency described in the Affirmation of Commitments?
- The trend in recent years toward increased analysis and detail has been very good, but we are not where we need to be yet. The level of detail provided in this document is still not sufficient to allow effective review and analysis of expenses in some cases. As noted above, the level of detail does not provide for good accountability and transparency because it is at too high a level in many cases.

Detailed Comments

2. Executive Summary of the FY11 Operating Plan and Budget

In Figure 2-1, in the column titled 'Promote Competition, Trust, Choice & Innovation', the two following proposed activities do not provide any assurance of a timely implementation of the new gTLD program:

- o Complete the next version of the Applicant Guidebook

- o Further work on the development of, and processes to support new gTLD implementation

*The last sentence on page 8 before the list of bullets in the paragraph titled '**Balancing workloads and setting priorities'** says, "This draft FY11 Operating Plan and Budget proposes that the following, otherwise important, programs and activities **not** be fully funded in FY11." Later on page 9 we are told, "As of 30 April 2010, the Reserve Fund had grown to over $47 million . . ." Considering that $47 million represents over 71% of the FY11 budgeted expenses it would seem prudent to not contribute anything to the reserve fund and to use the budgeted $3.1 million for other purposes.*

4. The FY11 Operating Plan

Figure 4-2 on page 15 contains budgeted expenses for New gTLD and IDN expenses. Are any of the amounts included in the New gTLD budget? If so, I do not think they should be duplicated. Will any of the expenses be included in New gTLD application fees? If so, once the expenses are incurred, it seems unnecessary to recoup the funds. Putting the portion of the fees into the Reserve Fund seems unnecessary considering the size of the Reserve Fund and recognizing that businesses that support ICANN are dealing with a down economy just like ICANN.

Again referring to Figure 4-2:
- o *In a year when GNSO improvements will be implemented, including added support for GNSO Stakeholder Groups and Constituencies, it is not at all clear that an increase of $175,000 will be sufficient, especially considering that this will fund support for all SOs and ACs. Because there is insufficient detail in the Draft Operating Plan, it is not possible to evaluate this.*
- o *Why is the Ombudsman budget increasing by $111,000 (24.6%)? As far as I can tell, there is no explanation for this in the budget.*
- o *A 15.2% increase ($764,000) is projected for the IANA Function and Technology Operations Improvements, but again there is insufficient explanation and budget breakdown to decide whether this is justified or not.*
- o *In addition to the previous three items, there is insufficient explanation and cost breakdown for the following budget categories:*
  - ▪ *Security, Stability and Resiliency (SSR) Operations*
  - ▪ *Contractual Compliance*
  - ▪ *Policy Development Support*
  - ▪ *Global Engagement and Increasing International Participation*
  - ▪ *Travel Support for ICANN Community*
  - ▪ *Board Support*
  - ▪ *Nominating Committee Support*
  - ▪ *Travel Support for ICANN Community*
  - ▪ *DNS Operations*

5. The FY11 Budget

The third paragraph on page 27 says, "New source of revenue for ICANN is from requests for IDNs through the Fast Track ccTLD program." Will the proposed revenue cover the costs of that program? It is impossible to even

make a guess about that in the Draft Budget because there is no detail. Why is it voluntary for ccTLDs and not for gTLDs? In the case of the GNSO New gTLD program, great efforts are being made to ensure that all costs of the program are covered, even past costs that were already included in previous fiscal years, but there is no evidence that this is a concern for ccTLDs. Why the disparate treatment? Why are gTLD fees continuing to be used to subsidize programs outside the GNSO? Is it because it is administratively convenient?

I want to point out that:
- o *Over 94% of FY11 revenue is projected to come from gTLD fees. (See Figure 5-2, FY11 Revenue Budget on page 28).*
- o *Less than $20 million of operating expenses go to support the GNSO. (See Figure F-1, Operating Expenses by SO/AC on page 81 in Appendix F.)*

An example of helpful detail in the Draft budget can be found on page 40 in the last main bullet of Section 5.2.2:

   *"*Other assumptions used in the travel budget include:
   - Airfare costs average $2,000 and are adjusted up or down depending on the venue and class of travel.
   - Lodging costs average $250 per night for the seven-day ICANN meeting. This is adjusted up or down depending on the venue, the negotiated hotel rates, and the length of time that the traveler is required to stay for ICANN business.
   - Per diems average $90/day or $500/stipend, . . .*"*

Another example of helpful breakout of expenses is found in Figure 5-11, but more detail for the major categories is needed to allow for thorough review and analysis of the budgeted amounts.

Here are some examples of helpful expense breakdown in the document:
- o *On page 43ff there is a good explanation and breakout of the Language Services Program.*
- o *Figure 5-14 and the following explanation of the categories of Administration expenses are very useful.*
- o *Figure 5-15 gives a good breakout of office space costs.*
- o *Figure 5-19 provides a helpful level of breakdown of capital expenditures.*

I believe that this level of detail should be provided for all major expense categories. Without it, it is not possible to adequately comment on the Budget.

7. Separate New gTLD Budget Amendment

I have one question regarding the budget for New gTLD program development on page 53: What are the estimated total development costs to be included in the application fee?

Appendix A – Operating Plan Activities

Section A.7 (Constituency Support) appears to only cover costs related to registries and registrars. Where are costs associated with support for other constituencies and stakeholder groups as recommended as part of the GNSO Improvement program?

Appendix C - Community Feedback

Table C-1, FY11 Community Support Travel Guidelines Community Feedback, on page 69 has a column titled Responses. But in many cases it simply refers back to sections of the document that are not detailed enough to be considered responsive to the questions asked.

➢ From the ccNSO and Nominet:

As a general observation, the ccNSO welcomes ICANN's commitment to increased transparency, clarity and completeness in the organisation's reporting and planning. The ccNSO places great importance on ICANN's strategic, operational and financial activities, as evidenced by the establishment and operation of a dedicated Strategic and Operational Planning Working Group that coordinates and organises the participation of ccTLD managers in ICANN's planning processes.
We particularly welcome the willingness of ICANN CFO, Kevin Wilson, to make himself available to brief the ccNSO, either face-to-face at ICANN meetings or via teleconference, and of ICANN staff to make their strategic and operational planning an iterative process, with the involvement of all community stakeholders.
However, with increased transparency and communication comes increased community awareness and knowledge and a resultant increase in questioning and scrutiny. The ccNSO Council, the ccNSO SOPWG and individual members all submitted comments and questions as part of the first consultation on the framework for the Operating Plan and Budget that commenced in February. Some of these issues have been addressed in subsequent dialogue and others have not. Below are a number of issues that the ccNSO believes are still outstanding, and that must be resolved before ICANN concludes this stage of its planning cycle.

Unanswered questions from initial ccNSO submission
On 31 March 2010, the ccNSO lodged a brief preliminary submission in response to ICANN's consultation on the framework for the Operating Plan and Budget. The submission queried some of the issues surrounding ICANN's projected budget over-run for FY2010 and the measures being taken to manage the situation. The questions reflected issues originally raised by the ccNSO Council at ICANN's Nairobi meeting.
The ccNSO notes that, on 10 May, ICANN staff published a summary of, and response to, comments received during the framework consultation. However, the ccNSO's questions were not fully addressed. These underlying questions were also raised in a teleconference on 19 May, at which Kevin Wilson undertook to provide a "definitive response" to "the ccNSO's pointed and operational questions". This commitment also remains unmet.
Once again, the questions are:
⬚ What were the significant unanticipated legal expenses? Were they exclusively in respect to the .xxx arbitration?
⬚ What were the new facilities and how much money was spent on them?
⬚ What were the senior-level hires, why was it necessary to execute rapidly on these hires, and what was the nature of the associated expenses?
⬚ What were/are the strategic consulting contracts and what was the nature of the expenses associated with these?
⬚ What was the nature of the costs associated with delays in key programmes such as the new gTLD programme?
The ccNSO would appreciate a prompt response to these questions, as it is important that all parties fully understand the problems associated with FY10 before commenting on and finalising the FY11 budget.

Questions and comments regarding the draft Operating Plan and Budget
The ccNSO would also welcome prompt feedback from ICANN on the following comments and questions, as the responses will facilitate greater understanding and informed consideration of, and better input to, ICANN's Operating Plan and Budget.
1. In ICANN's Strategic Plan matrix (Executive Summary - pg 6), the first two line items under "DNS Security and Stability" are "enhance existing DNS collaborative responses to abuse threats to DNS" and "initiate program for annual DNS risk assessment / systemic contingency planning".
The ccNSO would welcome more information regarding these items and what operational and

budgetary detail will be attributed to them.

2. On page 8, ICANN notes that "Work to develop alternative funding sources is required to avoid delaying some planned security trainings for ccTLD operators". What work will ICANN undertake and will the ccNSO be consulted?

3. The quantum of ICANN's Reserve Fund is discussed on page 9.What benchmarking work, if any, was undertaken before the decision was taken to reserve one year of operating expenses? Will this Fund be capped at any point, given annual operating expenses are a moving (and typically increasing) target?

4. Pages 11 and 12 outline ICANN's planning process and a proposed change to the process for FY12. As a general observation, the ccNSO is not certain that the draft Operating Plan and Budget is the appropriate place for the discussion of procedural changes and requests that ICANN undertake a separate public consultation on the matter.

5. On page 18, the ccNSO notes that additional expenses in FY10 related to arrangements for the Nairobi meeting have been attributed to Security, Stability and Resiliency Operations and used to explain the SSR budget over-run. The ccNSO believes that these are clearly meetings-related costs and would welcome a clear explanation of why they have not been attributed in that way.

6. In section 4.9 (page 22), Global engagement and international participation is listed as $1.2m – or nearly 20% - over budget. What were the reasons for the over-run?

7. Similarly, why did Community travel support (item 4.10 - page 22) run over budget?

8. Although only a relatively minor expense item, costs relating to the ombudsman's role are budgeted to increase by nearly 25%.What are the reasons for this increase? If this is a currency exchange issue, is there a plan for ICANN to hedge against future fluctuations?

9. On page 25, DNS Operations are listed as more than 100% over budget, and yet there is no discussion offered. What accounts for such a large over-run?

10. On page 27, investment income of $4.5m is forecast for FY10. Only $1m was budgeted for FY10 and only the same amounted is budgeted for FY11. This spike in investment income was not addressed in the operating and budget framework and barely mentioned in the current document and yet goes a long way to helping ICANN come in on budget for FY10. What was the reason for the significantly higher than expected investment income and why is the budget forecast for FY11 so low?

11. On page 35, ICANN has listed "travel and meetings" as a single operating expense. To many stakeholders, expenses related to travel and holding meetings are two very important and separate costs and the ccNSO requests that ICANN differentiate between the two and advises how much was spent on each.

12. On page 42, "Organization leadership support and others", with an FY11 budget of $0.9m, includes leadership support for the CEO and Chair. Is this secretarial support or another expense?

13. Page 48 notes that ICANN has signed a 10-year lease on a Palo Alto office. Why is ICANN investing in two offices in California, given the requirement for it to internationalise, under the Affirmation of Commitments?

14. On June 22, 2010, President and CEO Rod Beckstrom that ICANN's Strategic Plan is in fact a "wish list," and that not all strategic priorities will be executed on. This makes serious analysis of the Strategic Plan very difficult, as there is no way for stakeholders to confidently determine which elements of the wish list are expected to be undertaken and funded, and which are not going to be funded. As such, there is a need to better prioritise the strategic initiatives to ensure that they fit with resources – in terms of financial resources, staff capacity and community capacity.

15. Can ICANN differentiate between structural and discretionary costs (fixed vs. variable)? In other words, can ICANN specify which priorities must be funded and which are optional and hence assist with the prioritization of what can be cut or modified with the least impact?

16. We would like to make the observation that the cost cutting measures appear to be very short-term. In addition, they may in themselves be counter-productive.

➢ From CIRA:

Reserve Fund Model
ICANN has sought feedback on what the appropriate reserve fund model should be. There are numerous possible models, and this is a contentious issue that causes discontentment across the community and has a significant impact on operational planning. The issue of the suitable reserve fund model must be addressed and concluded in a timely manner by ICANN. This will be a key element in moving toward increased accountability and transparency.

Financial Accountability and Transparency
An expenditure analysis which would be very useful is one which distinguishes structural from variable expenditures. Structural expenditures are very difficult to withdraw once implemented. Variable expenditures are less difficult to remove or change if needed. Distinguishing between these types of expenditures would greatly assist all stakeholders in making recommendations about ICANN's reserve fund.
Furthermore, in making such a distinction, the global internet community requires far more transparency on what the process is for taking on new structural liabilities. Despite ICANN's bottom-up multi-stakeholder structure, services are provided that have not been requested, and may be allocated to a community which is then bound to support the initiative. We ask that ICANN state what the process is for making decisions about which services to provide and which expenditures to proceed with, and which to deny. We also request that unfunded liabilities not be entered into. ICANN must be certain of how expenditures will be funded, or provide a clear explanation of what is going to be cut out of the budget in order to fund a new liability. The community does not assume there will be endless growth at rates ICANN has seen in recent years. ICANN's FY11 Framework indicates a shortfall of USD 2.8 million halfway through FY10. It is unclear to us how this occurred, and how ICANN made decisions on what to spend and what to withhold spending on. Clear and transparent processes for disclosing forecast and actual expenditures and related decision-making processes are required for ICANN to live up to its transparency and accountability obligations.

FY11 Operating Plan
We request that the FY11 Operating Plan and Budget be prepared with increased transparency in expenditures and cut-backs, distinctions between structural and variable liabilities, not enter into unfunded liabilities, and propose a reasonable reserve fund model.

➢ From George Kirikos:

In addition to my prior comments at:
http://forum.icann.org/lists/op-budget-fy2011/msg00006.html
which ICANN ignored, according to the latest form 990 that ICANN has released:

http://www.icann.org/en/financials/tax/us/fy-2009-form-990-en.pdf

at least 16 (there might be more, e.g. "consultants", etc.) ICANN staffers were paid $200K+ (see column 9 of page 46). Eight of those pulled in $300K+. At a "non-profit". In a recession! You can compare the numbers to last year at:
http://gnso.icann.org/mailing-lists/archives/ga-200709/msg03017.html

and one can see a huge increase in wasteful spending, and overpaid staff. Compare the top 16 to the prior year's top 5, and there's been an explosion of wasteful spending. It makes one wonder how many other ICANN staff are sitting below these "top 16" with $100K+ salaries, hidden and unaccountable to the public. Jones Day was paid over $2 million last year (page 67). Compass Lexicon earned $307,165 for their

garbage economic reports which had no statistical analysis whatsoever! (also page 67). It's clear ICANN is living in an alternate universe if they think the above is acceptable or sound. It demonstrates their lack of accountability to be able to feed at the trough, at the expense of the public who pays all the bills. The need for serious cutbacks and slashing of this wasteful spending is obvious, unless you are drinking the ICANN Kool-Aid.

➢ From ALAC Executive Committee:

Thank you for joining the ALAC Executive Committee wrap-up meeting in Brussels. We appreciate you listening to our concerns, and we found your insights based upon your discussions about travel support with other SO/ACs helpful.

The current process for travel support is unwieldy and appears expensive for ICANN. Many (or perhaps most) of the volunteer travelers seem unhappy with the experience and results. To spend that amount of effort without the "gold medal" performance that you were aiming is surely disappointing.

I suspect that minor tweaks are not likely to fix the problems, so I offer a new approach. I think that it may address the overall concerns that ICANN has regarding fiduciary responsibility while putting more control in the hands of the travelers.

In short, I am suggesting that you OPTIONALLY allow travelers to make their own air travel arrangements, but subject to a number of constraints. I am also offering one variant that will maximize the benefit to ICANN and its constituent units of the budgeted travel funds.

I believe that you will still need an "official ICANN" travel agent, but offered as a resource not as a requirement. I am sure that many travelers will be happy to use them if the process were streamlined. Moreover, they will play an essential role in ensuring that the overall process costs are "reasonable", which should be a prime the target. I do not know if you currently use the same travel agency for staff travel as you do for volunteer travel, but I would suggest that doing so maximizes the agent's desire to keep ICANN happy on all counts, and guarantees them a substantial amount of business.

I support the current allocation of travel by "slots" allocated per group per meeting, but with an important variant I will discuss later in this note.

0. In the interest of transparency, I would suggest that whatever air travel rules are used be applied equally to Board members/liaisons as well as other volunteer travelers.

1. Travel is based on economy or business class as per the current rules. However, for long haul travel (flights over 6 hours or overall travel time over 18 hours), I suggest that booking on premium economy be allowed. Premium economy includes few of the real perks of business class, but does afford a modest increase in passenger comfort. Such bookings would still be subject to the price limitations to be described.

2. Prior to starting travel for any given event, your travel agent should compile a list of "ball-park" air fares for the list of cities typically used by ICANN travelers. The list might include 50-60 cities but based on my personal experiences, it should not take much time or effort to compile. I acknowledge that doing this well will require a good travel agent who understands the issues related to travel from and to locations that are "unusual" in the sense of traditional business travel and understands transit visa issues for those not from North America or western Europe. If some needed cities are omitted, they can be added later. Estimates should be based on fares of regularly schedules "business oriented" airlines. By that I exclude charter airlines, fares provided by consolidators and fares offered by airlines that focus on vacation and tour-package travelers - all of whom tend to provide very poor service to recover from

irregular operations. The estimate should include the service fee that would be charged by the agent if they did the booking.

3. I recommend that there still be an "exception" policy to handle requests outside of the constraints described here, but there should be far fewer of them. One exception that I would explicitly call out would be travel to and from the local airport where such travel clearly exceeds what could reasonably covered by per diem allocations.

4. Hotel nights and per diem (if used - see later) should be based on the need to be sufficiently rested for the first scheduled meeting. I have included details of such scheduling in previous messages, and can do so again, but I will not clutter this note with such details. In short, the person should be allowed to arrive early enough to get a full night's sleep the night before their first meeting. For venues where flights only arrive in the evening, this may mean that they be allowed to arrive a day early.

5. Hotel nights and per diem should be based on departures that allow the participant to attend all scheduled meetings. This should include the ability to stay in their room until a reasonable number of hours prior to flight time. Both this rule and the prior one are equivalent to the "reasonable" constraint placed on staff travelers, and volunteers should be offered no less.

6. Air travel fairs up the $300 or 10% (which ever is greater) above the estimate should be allowed. The $300 figure is what was used for a number of years and (as far as I understand) resulted in a higher level of traveler satisfaction and was not an unreasonable average burden for ICANN. I have added the 10% to accommodate similar issues for those travelers where business class is allowed. With the ICANN travel agent understanding this rule, many of the current exemptions would no longer be necessary.

7. For those travelers who can provide their own air travel at substantially below that of the estimate (perhaps the same $300 or 10%), ICANN should be willing to provide travel advances to pay for the ticket.

8. If a traveler needs to arrive early or late due to the lack of reasonable air options, the hotel and per diem should be covered by ICANN. There will be relatively few such cases and they can be easily audited or verified. Any such "extensions" are subject to audit by ICANN with the penalty being permanent withdrawal of self-reservation privileges.

9. If there is a substantial amount to be saved on airfare by scheduling an earlier arrival or later departure, such schedules should be allowed with ICANN paying the additional hotel and per diem, but only if the net savings is at least the greater of $300 or 10% of the original estimate. If making their own reservations, the traveler must document such savings. It is possible that the traveler may not be working for those days, but ICANN is still coming out ahead!

10. For reservations made by the traveler, unless an exemption has been granted, ICANN will reimburse no more that the lesser of the airfare paid, converted into US$, or the original estimate plus the greater of $300 or 10%.

11. I suggest a variation of the strict slot principle. Specifically, that the total airfare per group be compared to that budgeted (with allowance for business class travel granted for medical or size reasons), and that the group be allowed to use any significant savings for other pre-approved travel purposes (either to allow additional people to attend later ICANN meetings or for other events that support the mission of the group. For Board members, this should probably be tallied on an individual basis.

12. I would suggest a *reasonable* deadline for submitting travel expenses with a commitment by ICANN to pay promptly after submission if the deadline is met. I would be happy to comment on "reasonable".

Although not related to air travel, some people have hypothesized that reimbursing real and reasonable expenses instead of per diems (in cases where they are currently used) would result in a net savings to ICANN. However, I strongly question whether this is worth the additional staff time required to administrate it, the volunteer time to submit claims, or the grief that will be caused by the occasional rejection of claims.

I would be happy to provide further details or participate in any discussion on this proposal.

This message was originally written on my own behalf, but has since been reviewed by the ALAC and regional RALO leaders and has benefited from that review. At the ALAC meeting of 27 July 2010, it was formally and unanimously endorsed by the ALAC. You are welcome to share this with others and to have it posted to the ICANN Correspondence site.

Warm regards, Alan

II. The questions and comments that were submitted from May through the Brussels meeting, including any follow on conference calls, are compiled below with responses from ICANN staff:

Input	Response
….huge increase in wasteful spending, and overpaid staff (G.Kirikos)	See the finance blog
What were the significant unanticipated legal expenses? Were they exclusively in respect to the .xxx arbitration? (Nominet, ccNSO)	*ICANN has significant legal expenses each year. In FY10, the legal professional services line item had a $2.5 million budget. ICANN always anticipated that the ICM v. ICANN Independent Review proceedings ("IRP").would require significant legal resources, which were budgeted. Not anticipated was the time that the esteemed, three-member IRP Panel was required to invest in reviewing and analyzing i) the voluminous written material submitted (over 500+ pp submitted by ICM in the matter), and ii) the transcripts of the testimony after the five-day hearing held in September 2009 (Kevin Wilson)*
What were the new facilities and how much money was spent on them? (Nominet, ccNSO)	*Two new facilities were opened in FY10. The first new facility is in Washington DC, which was a move, rather than an actual new facility. This move was required to accommodate additional staff while taking advantage of office space cost efficiencies. As described in the board resolution http://www.icann.org/en/minutes/minutes-09dec09-en.htm, expenses are expected to start out at less than $400,000 per year, and not to exceed $600,000 per year during the lease term.". Although the size of the office has been increased to accommodate more staff, the longer term commitment for space and utilizing a space with less costly services, results in no change to overall costs for office occupancy.*
	The second new facility was in Palo Alto. The ICANN Board agreed to open a Palo Alto, CA office as one of the terms of entering into the relationship with ICANN's new CEO and President at the beginning of the fiscal year. Interim full service Regus office space was obtained for staff to use in Palo Alto costing less than $200k in FY10. In addition, as described in the Board resolution ttp://www.icann.org/en/minutes/prelim-report-30sep09.htm, a new longer term lease was executed to meet needs for current staff, including the CEO and to attract technically oriented talent for new staff. The occupancy costs, including amortized leasehold improvements, start out at less than $400,000 per year, and not to exceed $600,000 per year during the lease term. In FY10, leasehold improvement plans have been developed to complete the build out of the

Input	Response
	space, which are expected to cost $500k to $600k (net of tenant improvement allowance). No additional occupancy costs have been spent except for the Regus temporary space at this time. (Kevin Wilson)
What were the senior-level hires, why was it necessary to execute rapidly on these hires, and what was the nature of the associated expenses? (Nominet, ccNSO)	Response: *A listing of all ICANN staff, and their roles, are posted on the website here: http://www.icann.org/en/general/staff.html, and most senior level hires are announced on the* Page 3 *ICANN website. New hires or adjusted hires that were changed from the originally proposed budget during the fiscal year included: Rod Beckstrom - President and CEO; Paul Twomey – consulting services following the end of his tenure as President and CEO; Elise Gerich – Vice President, IANA; Whit Diffie - VP Info Security & Cryptography; Barbara Ann Clay - Vice President for Communications and Marketing; Jamie Hedlund - Vice President of Government Affairs – Americas; David Olive - VP Policy Development; Michael Salazar - Program Director for the New gTLD Application Process; Joe Abley - Director, DNS Group; Robb Antrobus - Director-gTLD Application Processing; Dane Suenaga - Project Manager, New gTLD Program; Francisco Arias - Registry Technical Liaison; Dongmei Cao - Senior Software Engineer;, and David Knight - Sr. DNS Engineer.* *Although ICANN generally does not provide salary information for individual staff members, information for highly compensated and key employees (as defined by the IRS) is available on the IRS Form 990 which is posted here: http://www.icann.org/en/financials/fiscal-30jun09.htm. Officer compensation is also listed in the compensation report which was most recently posted in January 2010 here: http://www.icann.org/en/financials/compensation-practices-31jan10-en.pdf.* *Compensation information is also available in some detail in the FY11 Operating Plan and Budget document which is posted here: http://www.icann.org/en/financials/proposed-opplan-budget-v1-fy11-17may10-en.pdf. In particular, please note section 5.2.1 personnel costs which starts on page 37. (Kevin Wilson)*

What were/are the strategic consulting contracts and what was the nature of the expenses associated with these? (Nominet, ccNSO)	*Professional service expenses for the FY11 budget are described in section 5.2.3 starting on page 40 of the document posted here: http://www.icann.org/en/financials/proposed-opplan-budget-v1-fy11-17may10-en.pdf.*
	 In FY10, large professional service expenses have included:
	  Argo Pacific Pty Ltd – Paul Twomey's consulting services following after his term as CEO and President ended and he served as Senior President; Compass Lexecon – new gTLD support
	  Equinix, Inc – Security resiliency support / bandwidth
	  Hill & Knowlton, Inc -- communications support
	  Iron Mountain Data – data escrow services
	  Jones Day -- IRP, litigation matters, legal advice, contract and other consulting
	  KPMG LLP – new gTLD, risk management
	 Page
		4
		  VeriLAN Event Services Inc. – technical support during meetings
		 (Kevin Wilson)

What was the nature of the costs associated with delays in key programmes such as the new gTLD (Nominet, ccNSO)	*Efforts over that anticipated in the FY10 Adopted budget were required to prepare the additional version of the applicant guidebook, help resolve overarching issues through economic studies, and provide additional editing and translation costs.* *,Additionally, new projects associated with the management of the reviews associated with the affirmation of commitments has caused additional*

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	unanticipated costs. For example, costs for the Accountability and Transparency Review Team (ATRT) have been spent for F2F meetings and other support, and additional expenses are being proposed for the new fiscal year. The FY11 budget for the ATRT and other reviews called for by the terms of the Affirmation of Commitments are under consideration as well. (Kevin Wilson)
In ICANN's Strategic Plan Matrix (Executive Summary – page 6), the first two line items under "DNS Security and Stability" are *"enhance existing DNS collaborative responses to abuse threats to DNS"* and *"Initiate program for annual DNS risk assessment / systemic contingency planning".* We would welcome more information regarding these items and what operational and budgetary detail will be attributed to them. (Nominet, ccNSO)	*The Security, Stability and Resiliency ("SSR") budget assumptions and key activities planned for FY11 are described in the budget document. See section 4.4 and appendix A.4. Additional information can be provided upon request. (Kevin Wilson)*
On page 8, ICANN notes that *"Work to develop alternative funding sources is required to avoid delaying some planned security trainings for ccTLD operators".* What work will ICANN undertake and will the ccNSO be consulted? (Nominet, ccNSO)	*This was a statement confirming that ICANN Staff may try to find partners to continue ccTLD training at or increased over the pace of the previous years. Any inputs on this issue will be gratefully accepted by the ICANN Staff and/or additional information can be provided upon request.(Kevin Wilson)*
The quantum of ICANN's Reserve Fund is discussed on page 9. What benchmarking work, if any, was undertaken before the decision was taken to reserve one year of operating expenses? Will this Fund be capped at any point, given annual operating expenses are a moving (and typically increasing) target? (Nominet, ccNSO)	The level of one year of operating expenses was determined to be the correct reserve fund level. *Research with other similar organizations was undertaken in 2007 at the time ICANN's investment policy was formalized. One year of operating expenses was thought to be a reasonable compromise given the sizes ranged from three months to three years or much more. Plans are underway to develop a more robust definition of the Reserve Fund sizing, additional consideration of the reasons for its size, and current benchmarking. The Board Finance Committee has requested staff to engage outside experts to perform this study, and will be reviewing the reserve fund level again, later this year.(Kevin Wilson)*
Pages 11 and 12 outline ICANN's planning process and a proposed change to the process for FY12. As a general observation, Nominet is not certain that the draft Operating Plan and Budget is the appropriate place for the discussion of procedural changes and requests that ICANN undertake a separate public consultation on the matter. (Nominet, ccNSO)	*Thank you for this productive comment and dialogue on this topic. Accordingly, development of, and decisions concerning, new planning processes will rise to the Board and community level. An initial effort for fine tuning the FY11 planning process will begin in late July. Discussions on the development plans for the FY12 Operating Plan and Budget will be initiated with SO/AC leadership in September 2010. The goal is to facilitate early and significant engagement with the SO/AC leadership for the next fiscal year's plans.(Kevin Wilson)*
On page 18, we note that additional expenses in FY10 related to arrangements for the Nairobi meeting have been attributed to Security, Stability and Resiliency Operations and used to explain the SSR budget over-run. We believe that these are clearly meetings-related costs and would welcome a clear explanation of why they have not been attributed in that way. (Nominet, ccNSO)	*The allocation of all of ICANN's operating expenses into the 15 organization activities identified in the Functional view of ICANN's expenses is new and evolving. There are judgment calls required. Although conceptually these costs could be considered an additional SSR requirement, and not part of the core meeting logistics, we'll note your point for future reports. More importantly, this signifies an increased review of the numbers by the community. Our goal is to make sure that each report is relevant and meaningful to the community.(Kevin Wilson)*
In section 4.9 (page 22), Global engagement and international participation is listed as $1.2m – or nearly 20% -over budget. What were the reasons for the over-run? (Nominet, ccNSO)	*Most of this increase is due to the cost allocations of executive labor and travel costs. Although each executive's time is allocated across functional areas individually, in general a higher percentage of executive labor is allocated to this functional category. With the extra costs of a senior president and other executive costs, the increase is shown impacting this organizational activity.(Kevin Wilson)*

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Similarly, why did Community travel support (item 4.10 -page 22) run over budget? (Nominet, ccNSO)	*Some of the increase is due to unit costs exceeding what was assumed in the budget. In addition, the administrative costs to support the community travel support are greater than anticipated in the FY10 budget.(Kevin Wilson)*
Although only a relatively minor expense item, costs relating to the ombudsman's role are budgeted to increase by nearly 25%. What are the reasons for this increase? If this is a currency exchange issue, is there a plan for ICANN to hedge against future fluctuations? (Nominet, ccNSO)	*Yes, this is a result of the currency exchange rates. ICANN does have an international currency risk management policy. With Board finance committee oversight, ICANN can apply currency hedging measures, and does so when the costs to administer such measures do not exceed the risks avoided. Near-term plans are to report in U.S. dollars, and hedging would not change the reported amounts. (Kevin Wilson)*
On page 25, DNS Operations are listed as more than 100% over budget, and yet there is no discussion offered. What accounts for such a large over-run? (Nominet, ccNSO)	*The increase is due to the large effort to prepare for DNSSEC, KSK, and other DNS operational activities. The costs include transfers of IT and other personnel to this organizational activity, and one-time build-out costs for the two key signing facilities.(Kevin Wilson)*
On page 27, investment income of $4.5m is forecast for FY10. Only $1m was budgeted for FY10 and only the same amount is budgeted for FY11. This spike in investment income was not addressed in the operating and budget framework and barely mentioned in the current document and yet goes a long way to helping ICANN come in on budget for FY10. What was the reason for the significantly higher than expected investment income and why is the budget forecast for FY11 so low? (Nominet, ccNSO)	*ICANN has traditionally not considered investment income, or losses, in its operational planning activities, other than savings for possible "black swan" events. Management, and the Board Finance Committee agree that the primary operational target for ICANN is to operate within the Operating Expense line item whenever possible. Even if other income sources dramatically increase, this should not change ICANN's operating plan The audited financials do require consideration for investment gains (both realized and unrealized), but the fiscal year operating plan traditionally does not. The growth in financial markets explains the bulk of the growth in ICANN's Reserve Fund. The growth in FY10 has exceeded the losses experienced in FY09, and thus the Reserve Fund is now "in the black". After consultations with UBS, ICANN's investment manager, $1 million was used for the FY11 budget investment income estimate. This is a conservative estimate that should not impact operational activities.* (Kevin Wilson)
On page 35, ICANN has listed "travel and meetings" as a single operating expense. To many stakeholders, expenses related to travel and holding meetings are two very important and separate costs (Nominet) and Nominet requests that ICANN differentiate between the two and advises how much was spent on each. (Nominet, ccNSO)	*Point well taken. We'll explore how to report on this distinction in the future and plan to include this in the final reporting for the year. Some of the challenge is separating travel costs related to a specific meeting versus travel costs for non-meeting activities. Many staff and others who support ICANN, perform "non meeting" activities at an ICANN meeting.(Kevin Wilson)*
On page 42, "Organization leadership support and others", with an FY11 budget of $0.9m, includes leadership support for the CEO and Chair. Is this secretarial support or another expense? (Nominet, ccNSO)	*Yes, secretarial support for the ICANN Board Chair is included as well as other consulting and training costs for the CEO and senior leadership.(Kevin Wilson)*
Page 48 notes that ICANN has signed a 10-year lease on a Palo Alto office. Why is ICANN investing in two offices in California, given the requirement for it to internationalise, under the Affirmation of Commitments? (Nominet, ccNSO)	*The ICANN Board agreed to open a Palo Alto, CA office as one of the terms of entering into the relationship with ICANN's new CEO and President at the beginning of the fiscal year. Interim full service Regus office space was obtained for staff to use in Palo Alto costing less than $200k in FY10. In addition, as described in the Board resolution ttp://www.icann.org/en/minutes/prelim-report-30sep09.htm, a new longer term lease was executed to meet needs for current staff, including the CEO and to attract technically oriented talent for new staff. The occupancy costs, including amortized leasehold improvements, start out at less than $400,000 per year, and not to exceed $600,000 per year during the lease term. In FY10, leasehold improvement plans have been developed to complete the build out of the space, which are expected to cost $500k to $600k (net of tenant improvement allowance). No additional occupancy costs have been spent except for the*

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	Regus temporary space at this time. (Kevin Wilson)
Can ICANN differentiate between structural and discretionary costs (fixed vs. variable)? In other words, can ICANN specify which priorities must be funded and which are optional and hence assist with the prioritization of what can be cut or modified with the least impact? (Nominet, ccNSO)	*This is a challenging request as almost all costs are variable. Only a few long-term contracts (e.g., leases) exist. Of course, personnel costs might be considered less variable than other costs. Efforts to identify priorities more clearly will be integrated in the FY11 plans and more heavily integrated in the development of the FY12 plans.(Kevin Wilson)*
On June 22, 2010, President and CEO Rod Beckstrom stated that ICANN's Strategic Plan is in fact a "wish list," and that not all strategic priorities will be executed on. This makes serious analysis of the Strategic Plan very difficult, as there is no way for stakeholders to confidently determine which elements of the wish list are expected to be undertaken and funded, and which are not going to be funded. As such, there is a need to better prioritise the strategic initiatives to ensure that they fit with resources – in terms of financial resources, staff capacity and community capacity. (Nominet, ccNSO)	*Acknowledged. Efforts to identify priorities more clearly will be integrated in the FY11 plans going forward and as mentioned above will be more heavily integrated in the development of the FY12 plans. This is also an important point to consider as new approaches are considered to the overall planning cycle.(Kevin Wilson)*
We would like to make the observation that the cost cutting measures appear to be very short-term. In addition, they may in themselves be counter-productive(Nominet, ccNSO)	*Acknowledged. If you can provide specific examples of cost containment efforts that are not effective for ICANN's long term success, we would welcome that feedback.(Kevin Wilson)*
The issue of the suitable reserve fund model must be addressed and concluded in a timely manner by ICANN. This will be a key element in moving toward increased accountability and transparency. (CIRA)	*We welcome suggestions on how to size/model and manage the reserve fund's assets. The policy itself calls for periodic review and updates We post the Investment Policy and it's regularly updated versions on line here: http://www.icann.org/en/financials/icann-investment-policy-jul2009.htm. We post its performance on the dashboard here: http://forms.icann.org//idashboard/public/. Under the direction of the Board Finance Committee, an outside expert is reviewing the investment policy including risk levels, sizing, and asset mix. Any more specific suggestions to improve accountability are welcome. (Kevin Wilson)*
An expenditure analysis which would be very useful is one which distinguishes structural from variable expenditures. Distinguishing between these types of expenditures would greatly assist all stakeholders in making recommendations about ICANN's reserve fund. (CIRA)	*Each year, we show more and more views of ICANN's finances both budgets and actual expenditures. The specific long term costs (e.g., real estate leases) are shown in some detail in the budget document. More clarity on what the community determines as structural vs variable would be helpful so that additional views can be evaluated for future presentations. (Kevin Wilson)*
The global internet community requires far more transparency on what the process is for taking on new structural liabilities. We ask that ICANN state what the process is for making decisions about which services to provide and which expenditures to proceed with, and which to deny. (CIRA)	*The process taking on organizational activities are captured in the annual update to the 3-year Strategic Planning process and fiscal year Operational planning and budget development process. The current process is described here: http://www.icann.org/en/planning/. The final fiscal year adopted budget describes in some detail the services to be provided and the expenditures expected. It also describes some activities proposed but not undertaken. In addition, the procurement guidelines and disbursement guidelines describe how individual commitments are to be made. For example, commitments and/or disbursements in excess of $500k require Board approval even if they are described in some detail in the fiscal year adopted budget. As for the term "structural liabilities", this needs to be more carefully understood if a more detailed answer is required. (Kevin Wilson)*

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We also request that unfunded liabilities not be entered into. ICANN must be certain of how expenditures will be funded, or provide a clear explanation of what is going to be cut out of the budget in order to fund a new liability. (CIRA)	*Understood. New commitments are considered in context of overall budget spend and plans for contribution to reserve. (Kevin Wilson)*
ICANN's FY11 Framework indicates a shortfall of USD 2.8 million halfway through FY10. It is unclear to us how this occurred, and how ICANN made decisions on what to spend and what to withhold spending on. (CIRA)	*The recent blog addresses this issue: http://blog.icann.org/2010/07/icanns-finances-at-a-glance/ (Kevin Wilson)*
ICANN should consider a long-term budget for gTLD Implementation and Delegation that can be spread out over several fiscal years, freeing up resources for FY11 and beyond to be used for organizational activities that in IPC's view remain underfunded, such as Contractual Compliance and better Rights Protection Mechanisms in existing and new gTLDs (IPC)	*We agree. ICANN recently published a separate new gTLD budget for community discussion http://www.icann.org/en/topics/new-gtlds/new-gtld-budget-28may10-en.pdf. As indicated in the commentary, a separate budget is required because: timing of new gTLD spending does not align with the fiscal year and the amount of spending could mask important discussion on important initiatives. The budget provides a model to be used in future new gTLD operations. In addition, the budget indicates that net spending on new gTLD will be reduced to zero in the near future, freeing up resources to support other important initiatives. (Kurt Pritz)*
IPC has difficulty identifying the boundaries of these areas (Security, Stability and Resiliency, DNS Operations, and IANA and Technological Operations Improvements), as well as understanding which ICANN entities are responsible for implementation and oversight of the increased resources.	*The Security, IANA, and DNS Operations departments within ICANN provide complementary and distinct roles in administering the names, numbers and protocol parameter functions. The Security, Stability, and Resiliency (SSR) Plan developed within the Security department defines a corporate wide plan of which only a subset relates to IANA and DNS Operations. The IANA department executes a subset of the overall corporate SSR plan that has to do with resiliency and continuity of the IANA functions in the case of a disaster. The IANA department has additional responsibilities associated with the administration of the names, numbers and protocol parameters that support the Internet and the Domain Name System. The DNS Operations team has operational responsibilities for systems and facilities supporting the deployment of DNSSEC in the root zone. The Security department develops the overall corporate strategy and the IANA department and DNS Operations team, as a subset of their activities, execute and implement relevant portions of the SSR Plan. the Proposed Strategic Initiatives for Improved DNS Security, Stability and Resiliency (SSR) on 12 February 2010 specified that those initiatives were not funded in the FY11 budget and alternative sources of funding those initiatives would be needed if pursued. (Elise Gerich)*
Last year we welcomed ICANN's plan to hire a Whois compliance manager, and to train and support auditors in three additional global regions However, ICANN appears not to have followed through on that plan to date, as there is no publicly identified Whois compliance manager, and we understand that ICANN has only hired one regional auditor in Asia. In particular with respect to Whois, in light of the very clear Affirmation of Commitments on this point, ICANN needs to do MUCH more to improve the accuracy of Whois data.(IPC)	*ICANN remains strongly committed to an effective contractual compliance program – as indicated by recent statistics indicating an uptick in enforcement actions. ICANN is posting three new compliance positions to ensure continued improvements in performance. Increased focus on Whois accuracy will be an explicit objective of these positions.(Kurt Pritz)*
Whois Accuracy Study: extra budget needs to be set aside not just for compliance functions in this area, but also for policy development (IPC)	*We agree. ICANN is funding four Whois studies requested by the GNSO, $400,000. Additionally ICANN staff is supporting a report on Whois Registration Data by the SSAC (Steve Sheng and David Piscatello) that will inform Whois Policy discussion. Policy support staff is also funded to facilitate Whois*

Input	Response
	accuracy discussions in Supporting Organizations and Advisory Committees. (Kurt Pritz)
"…more concerted efforts are needed to raise dramatically the profile of compliance issues from the viewpoint of contracted parties… question of strategy, which is probably the most important one, appears to have advanced the least so far.,, external ICANN contract compliance advisory council" contemplated in last year's plan seems to have been discarded, though we thought it could be of great value in evaluating ICANN's successes and shortcomings in this field,,, remains our hope that such a council should be populated" (IPC)	*ICANN continues to consult with the community on contractual compliance issues to, for example, publish clarifying advisories on registry and registrar obligations. Even though not specifically described in the current operating plan, ICANN will pursue the formation of a external team to provide advice and guidance on the prosecution of ICANN's contractual compliance function. Such a team would provide valuable advice not available through other means.(Kurt Pritz)*
As for the Whois data problems reporting system (WDPRS), IPC repeats the IPC's request from last year, that ICANN devote some of ICANN's public relations spending to publicizing the availability of this system among consumers, domain name registrants, anti-phishing and other anti-fraud organizations, and civil and criminal law enforcement agencies, with the goal of making its use routine, not exceptional, whenever users encounter registrant contact data that appear false. (IPC)	*As several improvements are planned to make the WDPRS more effective, it also makes sense that those improvements be publicized to promote usage and provide improvement to Whois accuracy. As there are several ways to distribute that information, we will make cost-benefit decisions on the ways to effectively create awareness. (Kurt Pritz)*
"..ICANN is still failing to reach in any real way beyond contracted parties in its policy making process and oversight activities. While there is some lip service paid to reaching out to other constituencies, virtually all Constituency Support, Core Meeting Logistics, Policy Development support and Global Engagement activities revolve around contracted parties rather than support for activities that obtain input from or discuss current issues with representatives of other constituents such as private sector internet businesses or intellectual property owners. We believe that a key problem with the Proposed Budget is lack of budget to promote adequate growth of the non-contracting Constituencies. We suggest that ICANN make an initial grant of $100k per year for 3 years with the availability of a further $150k in matching funds to enable the non-contracted constituencies to hire more professional help, cover travel to meetings, conduct outreach, etc. We welcome the ICANN Board's commitment to "make adjustments to the [FY 2011] budget where appropriate in order to address the community's concerns" (IPC)	*This impression is incorrect. From Staff assignments and time commitments to resource allocations, ICANN policy development support efforts are substantially distributed among all ICANN communities, supporting organizations and advisory committees. Policy staff also heavily involves other internal departments and staff in community follow-up and policy development activities. Policy staff is always available to participate in community events and conference calls. The comment suggests that a better job must be done to promote this availability.* *In approving various recommendations of the Board Governance Committee's GNSO Review Working Group on GNSO Improvements (see - BGC Report - Feb 2008), the Board anticipated that the GNSO's policy development process would be improved by additional community participation and engagement. The potential growth of all GNSO constituencies (Stakeholder Groups and formal GNSO Constituencies) - in both size and numbers - was a key expectation of the Board.* *To help achieve that goal, the Board directed the GNSO community to come up with recommendations to improve the processes, services and outreach mechanisms available to its constituencies. The vehicle for developing those recommendations has been the GNSO Constituency and Stakeholder Group Operations Work Team (CSGO WT) (see - CSGO-WT Wiki Link).* *Last December, the GNSO Council approved a set of recommendations offered by the CSGO-WT designed to improve the services that ICANN offers to GNSO constituencies. Those services were labeled by the work team and approved by the Council in the form of a "toolkit" of potential services to be developed by the Staff.* *It is important to emphasize that as recommended, the services were to be provided either as "in-kind" or via grants to individual constituencies. In beginning to developing that program and looking toward a "flat" FY11 budget the Staff focused on the provision of in-kind services with an eye toward*

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	achieving economies of scale and ensuring a level playing field for all constituencies into those plans. The rationale behind the Staff's planning to date has focused on initially providing the type of support that can be handled by existing GNSO general and administrative services (including the GNSO Secretariat) rather than to financial grants (which cannot be uniformly managed and evaluated) and using FY 11 as a year of learning before making substantial budget commitments to services that might not be useful or sustainable. *In preparing the FY11 policy budget contributions, the Staff identified approximately $100,000 in additional in-kind expenses relating to telephone conference calls and web services that would need to be added into the budget to accommodate some of those services that could not be handled by existing staff or infrastructure. While it might be useful to set aside another $50,000 to cover initial additional expenses, that number could not be justified by information available at the time the FY 11 budget was completed.* *Another part of improving participation and engagement is the concept of outreach which the IPC comments also mention. The CSGO-WT is still working to develop its recommendations regarding constituency outreach and it was premature to provide for specific funding in that regard for the FY 11 budget. While it might be useful to set aside an additional amount of money to cover additional outreach expenses, that number could not be justified by information available at the time the FY 11 budget was completed.* *Mindful of community interest about additional regional gatherings that are of value to all community members, the Staff has also been investigating ways to develop proposals to take advantage of existing community meetings and events so that pilot projects could be tried in FY 11 with an eye toward more concrete commitments, if feasible, in FY12.(ICANN Policy Staff)*
Except for Councilor travel to ICANN meetings, the Commercial and Non-Commercial Stakeholder Groups do not receive any funding support from ICANN, and continue not to do so under the FY 2011 Operating Plan and Budget (notwithstanding the misleading and inaccurately-titled Constituency Support section it contains). We call on ICANN and the ICANN Board to remedy this patent inequality in light of the ICANN mandate. We believe that all ICANN stakeholder groups should receive fair, equitable, adequate and non-discriminatory ICANN support. (IPC)	*The FY11 Travel Guidelines, developed with community feedback in multistakeholder, bottom up process, provides for Travel Support for a number of community members….allocations of the travel slots are delegated to leaders in the various SO/AC's own internal processes. Given tight budget pressures, more travel funding than the nearly $1.9 million already provided, would need to be carved out of other parts of ICANN's budget. (Kevin Wilson)*
In addition, in Section 4.8 (as well as in section 5.2.3), we note the references to "fact-based studies to support policy development processes." ICANN should clarify and ensure that this reference refers, perhaps among others, to the Whois-related studies that, after long and careful development, may be ready for implementation and thus likely require funding in FY11. We understand that, although not expressly broken out, the budget includes over $400,000 for Whois-related studies, and simply wish to ensure that such studies in fact are allocated the necessary resources to move forward, when ready. (IPC)	*The "fact-based studies" referenced in Section 4.8 do indeed include potential Whois studies and those resources will be made available, when necessary, during FY 11, consistent with GNSO Council decisions. Fact-based studies are a vital component of the policy development process generally and funding has been allocated to support expert research and analysis to support PDP efforts by ICANN supporting organizations (ccNSO and GNSO) as community demands warrant. (ICANN Policy Staff)*
This [Ombudsman] budget area is slated for a spending increase of 24.6%. The FY11 Draft Operating Plan and Budget does not provide any explanation for	*The ombudsman budget increase of $111,000 is primarily due to differences in exchange rates as most of the expenditures are denominated in Canadian dollars. (Kevin Wilson)*

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this substantial increase. IPC believes that an explanation should be provided in the FY11 Final Operating Plan and Budget. (IPC)	
In Figure 2-1, in the column titled 'Promote Competition, Trust, Choice & Innovation', the two following proposed activities do not provide any assurance of a timely implementation of the new gTLD program: Complete the next version of the Applicant Guidebook and Further work on the development of, and processes to support new gTLD implementation (C.Gomes)	*While technically correct, ICANN has made several recent announcements regarding the new gTLD program to underscore its sense of urgency regarding implementation. For example, the Board recently resolved to conduct a workshop to resolve remaining issues. Even given that sense of urgency, ICANN has been reticent to publish an opening date because of the nature of the ICANN public participation based process. While understanding the new gTLD launch cannot be all things to all people, we continue to work with the community on determining the best implementation plan.(Kurt Pritz)*
The last sentence on page 8 before the list of bullets in the paragraph titled 'Balancing workloads and setting priorities' says, "This draft FY11 Operating Plan and Budget proposes that the following, otherwise important, programs and activities not be fully funded in FY11." Later on page 9 we are told, "As of 30 April 2010, the Reserve Fund had grown to over $47 million . . ." Considering that $47 million represents over 71% of the FY11 budgeted expenses it would seem prudent to not contribute anything to the reserve fund and to use the budgeted $3.1 million for other purposes.(C. Gomes)	*This point is well noted, and is one of the reasons that the costs in FY10 were allowed to exceed the FY10 budget as important new work was identified. That being said, the finance committee of the Board and sound fiscally responsible management requires prudent reserves to be developed and maintained. The budget development process is a balancing act requiring careful assessment of priorities. Knowing which activities are essential and required for ICANN's mission and which activities can be delayed without significant deleterious effects is a challenge. (Kevin Wilson)*
Figure 4-2 on page 15 contains budgeted expenses for New gTLD and IDN expenses. Are any of the amounts included in the New gTLD budget? If so, I do not think they should be duplicated. Will any of the expenses be included in New gTLD application fees? If so, once the expenses are incurred, it seems unnecessary to recoup the funds. Putting the portion of the fees into the Reserve Fund seems unnecessary considering the size of the Reserve Fund and recognizing that businesses that support ICANN are dealing with a down economy just like ICANN.(C.Gomes)	*There is no duplication in expenses between the regular operating budget and the separate new gTLD budget. It is intended that development expenses be recovered at the rate of $26K per application until development expenses are covered. The reasoning for this is described in previously published explanatory memoranda. (Kurt Pritz)*
Again referring to Figure 4-2: In a year when GNSO improvements will be implemented, including added support for GNSO Stakeholder Groups and Constituencies, it is not at all clear that an increase of $175,000 will be sufficient, especially considering that this will fund support for all SOs and ACs. Because there is insufficient detail in the Draft Operating Plan, it is not possible to evaluate this. (C.Gomes)	*Due to the "flat" budget going into FY 11, much of the GNSO implementation effort was planned to be absorbed into the existing Policy Development budget. As existing work teams and committees wind down, staff time and resources (much of which are not in the Policy Development budget, but are actually allocated to G&A/overhead or staffing expenses) were anticipated shifting to specific implementation exercises. During the FY 11 budget development process the Staff specifically identified potential additional expenses for teleconference and web presence support for GNSO SGs and Constituencies. As the implementation process rolls out, additional areas may be identified and will be managed accordingly. (ICANN Policy Staff)*
Why is the Ombudsman budget increasing by $111,000 (24.6%)? As far as I can tell, there is no explanation for this in the budget. (C.Gomes)	*The ombudsman budget increase of $111,000 is primarily due to differences in exchange rates as most of the expenditures are denominated in Canadian dollars. (Kevin Wilson)*

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A 15.2% increase ($764,000) is projected for the IANA Function and Technology Operations Improvements, but again there is insufficient explanation and budget breakdown to decide whether this is justified or not. (C.Gomes)	*"The increase represents improved infrastructure, security, and stability measures and is a combination of IT, DNS, and IANA budgetary needs." (Elise Gerich)*
In addition to the previous three items, there is insufficient explanation and cost breakdown for the following budget categories: Security, Stability and Resiliency (SSR) Operations Contractual Compliance Policy Development Support Global Engagement and Increasing International Participation Travel Support for ICANN Community Board Support Nominating Committee Support Travel Support for ICANN Community DNS Operations (C.Gomes)	*The adopted budget document provides numerous pages of explanations and details of these items. For FY12, even more details can be provided as part of the new budget development process.(Kevin Wilson)*
The third paragraph on page 27 says, "New source of revenue for ICANN is from requests for IDNs through the Fast Track ccTLD program." Will the proposed revenue cover the costs of that program? It is impossible to even make a guess about that in the Draft Budget because there is no detail. Why is it voluntary for ccTLDs and not for gTLDs? In the case of the GNSO New gTLD program, great efforts are being made to ensure that all costs of the program are covered, even past costs that were already included in previous fiscal years, but there is no evidence that this is a concern for ccTLDs. Why the disparate treatment? Why are gTLD fees continuing to be used to subsidize programs outside the GNSO? Is it because it is administratively convenient? (C.Gomes)	*The $26K fee for requesting an IDN ccTLD is intended to recover the direct expenses associated with processing that application. The 3% contribution from IDN ccTLD revenue is intended to cover the costs of providing services for the IDN ccTLD and is intended to be a model for ccTLD support generally. The ccTLD fees are voluntary because there is no requirement for contract between the two parties. ICANN continues to press for increased contributions from parties outside GNSO contracted parties and would appreciated any parties communicating with their governments and local ccTLD managers regarding the value and importance of the ICANN model and advocating for its financial support.(Kurt Pritz)*
..regarding the budget for New gTLD program development on page 53: What are the estimated total development costs to be included in the application fee? (C.Gomes)	*An explanatory memorandum previously published indicated the development costs of $13MM would be recovered at the rate of $26K per application. Delays in the program due to extended discussion and development have increased development costs. In order to maintain the previously posted application fee, those development costs will still be recovered at the same rate; the recovery period might be extended past the first round.(Kurt Pritz)*
Section A.7 (Constituency Support) appears to only cover costs related to registries and registrars. Where are costs associated with support for other constituencies and stakeholder groups as recommended as part of the GNSO Improvement program? (C.Gomes)	*The description of this organizational activity is not entirely clear. Yes, constituency support includes support for registries and registrars, but it also includes support for all constituencies and stakeholder groups. More information on this will be provided as part of the upcoming budget discussions with the community. (Kevin Wilson)*

Input	Response
For the ALAC, during the period 2010–2013, support one General Assembly for each of the five Regional At-Large Organizations (RALOs) held in conjunction with either an ICANN or key regional Internet stakeholder meeting" I ask you whether it is possible to consider giving support to LACRALO for holding our GA. (Cheryl Langdon-Orr, ALAC)	*Secretariat, technical, interpretation, meeting space, and other support is planned for general assemblies held in conjunction with ICANN meetings. The travel guidelines provide for travel support for general assemblies held at ICANN meetings for RALO's as long as it's traded off with ALAC support. (Kevin Wilson)*
The current process for travel support is unwieldy and appears expensive for ICANN. Many (or perhaps most) of the volunteer travelers seem unhappy with the experience and results. To spend that amount of effort without the "gold medal" performance that you were aiming is surely disappointing.(Alan Greenburg for ALAC Exec Comm)	*Acknowledged. We will continue to strive for the gold medal. (Kevin Wilson)*
I support the current allocation of travel by "slots" allocated per group per meeting, but with an important variant …I will discuss later in this note. .(Alan Greenburg for ALAC Exec Comm)	*The Constituency Travel team is currently considering similar options with suggested costs and limits not to exceed certain established rules. (Kevin Wilson)*
Travel is based on economy or business class as per the current rules. However, for long haul travel (flights over 6 hours or overall travel time over 18 hours), I suggest that booking on premium economy be allowed. Premium economy includes few of the real perks of business class, but does afford a modest increase in passenger comfort. Such bookings would still be subject to the price limitations to be described. .(Alan Greenburg for ALAC Exec Comm)	*Acknowledged and this will also be under consideration as the Travel team works on an updated version of the Travel Guidelines. (Kevin Wilson)*
Prior to starting travel for any given event, your travel agent should compile a list of "ball-park" air fares for the list of cities typically used by ICANN travelers. The list might include 50-60 cities but based on my personal experiences, it should not take much time or effort to compile. I acknowledge that doing this well will require a good travel agent who understands the issues related to travel from and to locations that are "unusual" in the sense of traditional business travel and understands transit visa issues for those not from North America or western Europe. If some needed cities are omitted, they can be added later. Estimates should be based on fares of regularly schedules "business oriented" airlines. By that I exclude charter airlines, fares provided by consolidators and fares offered by airlines that focus on vacation and tour-package travelers - all of whom tend to provide very poor service to recover from irregular operations. The estimate should include the service fee that would be	*Acknowledged and this will also be under consideration as the Travel team works on an updated version of the Travel Guidelines. (Kevin Wilson)*

Input	Response
charged by the agent if they did the booking. (Alan Greenburg for ALAC Exec Comm)	
Hotel nights and per diem (if used - see later) should be based on the need to be sufficiently rested for the first scheduled meeting. I have included details of such scheduling in previous messages, and can do so again, but I will not clutter this note with such details. In short, the person should be allowed to arrive early enough to get a full night's sleep the night before their first meeting. For venues where flights only arrive in the evening, this may mean that they be allowed to arrive a day early. (Alan Greenburg for ALAC Exec Comm)	*Agreed and this is something that we already have in place with the current Travel Guidelines. Noted that there are cases where due to limited flight options, this does not work perfectly, but in general, it is an outcome the Travel team strives to accomplish. (Kevin Wilson)*
For those travelers who can provide their own air travel at substantially below that of the estimate (perhaps the same $300 or 10%), ICANN should be willing to provide travel advances to pay for the ticket. (Alan Greenburg for ALAC Exec Comm)	*Acknowledged and this will also be under consideration as the Travel team works on an updated version of the Travel Guidelines. (Kevin Wilson)*
If there is a substantial amount to be saved on airfare by scheduling an earlier arrival or later departure, such schedules should be allowed with ICANN paying the additional hotel and per diem, but only if the net savings is at least the greater of $300 or 10% of the original estimate. If making their own reservations, the traveler must document such savings. It is possible that the traveler may not be working for those days, but ICANN is still coming out ahead! (Alan Greenburg for ALAC Exec Comm)	*Agreed and this is something that , for the most part, we already have in place with the current Travel Guidelines but will continue to keep additional thoughts under consideration as the Travel team works on an updated version of the Travel Guidelines. (Kevin Wilson)*
I suggest a variation of the strict slot principle. Specifically, that the total airfare per group be compared to that budgeted (with allowance for business class travel granted for medical or size reasons), and that the group be allowed to use any significant savings for other pre-approved travel purposes (either to allow additional people to attend later ICANN meetings or for other events that support the mission of the group. For Board members, this should probably be tallied on an individual basis. (Alan Greenburg for ALAC Exec Comm)	*Acknowledged and this will also be under consideration as the Travel team works on an updated version of the Travel Guidelines. (Kevin Wilson)*

Input	Response
I would suggest a *reasonable* deadline for submitting travel expenses with a commitment by ICANN to pay promptly after submission if the deadline is met. I would be happy to comment on "reasonable". (Alan Greenburg for ALAC Exec Comm)	*Acknowledged and this will also be under consideration as the Travel team works on an updated version of the Travel Guidelines. (Kevin Wilson)*

RESPONDENTS

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