1. The Non-Commercial Stakeholders Group (NCSG) welcomes the opportunity to comment on the proposed Public Technical Identifiers (PTI) Operating Plan and Budget, and the proposed IANA Operating Plan and Budget, for the coming fiscal year 2020.

2. The NCSG is the most diverse body in the Generic Names Supporting Organization, with individual and organisational members from 128 countries. As a network of individual and organisational academics, Internet end-users, and civil society actors representing the interests of non-commercial registrants, we represent a broad cross-section of the global Internet community.

3. As a Civil Society Constituency, we are concerned with the rights of non-commercial internet users of and matters concerning the policy development regarding gTLDs. NCSG Supports the variations made to address the Technical and Administrative Expenditure in both PTI and IANA Budget to deliver smooth and robust operation and maintenance of key Internet Resources and we are keen follow up on IANA operations and developments from a GNSO stakeholder group perspective.

4. NCSG strongly supports the continued maintenance of the PTI budget to ensure continuity of service in the IANA functions. The flat year on year approach of the FY20 budget is acceptable to NCSG as long as the IANA customers and the core maintenance of the RZMS and the other IANA functions are sufficiently accounted for in the FY20 budget.

5. NCSG would look favourably upon including more decimals in future budgetary documents to be presented for public comment. Indeed, for a total budget of 10 million USD, it would be beneficial to have more precision than up to 100 000 USD.

6. While NCSG understands that ICANN wishes to maintain uniformity throughout the whole organisation on how budgetary matters are presented, certain elements of the two documents under comment here can appear confusing to the community and the public. More precisely, we are referring to naming conventions (“Core IANA Services”, “IANA Services”, “PTI O&B”, “Contract Oversight and Auxiliary Services”), footnote (a) of Appendix A and B (which cannot be understood without precise knowledge of the context of the transition of IANA from ICANN to PTI), as

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well as the numbering of Section 5.1 in the IANA Budget. NCSG is happy to work further with the relevant persons and departments of ICANN org to find ways to improve the accessibility of future budgetary documents while meeting ICANN org’s objectives of uniform presentation.