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Original Public Comment: [Draft ICANN Strategic Plan and Operating Plan Framework for FY26-30 \(/en/public-comment/proceeding/draft-icann-strategic-plan-and-operating-plan-framework-for-fy26-30-23-07-2024\)](#)

1. How well does the vision statement align with your expectations or the needs of the community?

Very well

Comments

The Vision mentions trust, global interoperability and suggests clearly that the multi-stakeholder model is central to this vision.

1. Are the strategic objectives clearly stated and easy to understand?

Yes

2. Do the strategic objectives adequately address the key issues and challenges facing ICANN?

No

Comments

With regard to Strategic Objective (SO) 1, the SOPC believes that it is meant to address the challenges described in the Draft: "The importance of preserving an inclusive governance model, both within ICANN and in the broader Internet governance landscape, was identified as a key challenge." The SOPC notes that the way in which SO1 is worded, the focus will be on internal ICANN processes. SO1 does not reflect ICANN's role as an "international organisation charged with a significant role in the Internet Governance ecosystem". This concern was earlier raised by the ccNSO Council in its letter to ICANN Board and Interim CEO & President. See the letter from ccNSO Chair to ICANN on 15 July 2024 on ICANN's approach to promoting and defending ICANN's Multi-stakeholder Model (MSM) and ICANN's role in other Internet Governance discussions: <https://ccnso.icann.org/en/about/reynoso-to-costerton-sinha-15jul24-en.pdf> That letter calls for ICANN to resume the work of leading ICANN's whole community in explaining, promoting and defending ICANN's MSM in the context of the GDC and the WSIS+20 review and describes this as urgent work to respond to the challenge identified by ICANN on page 3 of the Draft Strategic Plan to "maintain a unified global internet." Link here for ICANN's response to that letter: <https://ccnso.icann.org/en/about/costerton-to-reynoso-25jul24-en.pdf>. Although action has been taken in this area with setting up the WSIS+20 group, the SOPC strongly suggests that SO1 should be reworded to better reflect both the internal and external focus. The suggested wording is: "Evolve and promote ICANN's multistakeholder model to sustain a global and inclusive model for Internet Governance." With respect to SO3 the SOPC notes that ICANN's draft Strategic Objective is more aspirational and therefore intentionally more vague. The text of SO3 would be improved if the word "Collaborate" would be changed to "enhance through collaboration" or something similar. Using a term like "collaborate" without any qualification does not set any direction and is less measurable. The SOPC believes that by the suggested change, the SO3 will have greater impact.

3. Are there any additional strategic objectives that need to be added, removed, or modified?

Yes

Comments

Strategic Objective 1 needs to be modified to reflect the external challenges to the Multi-stakeholder model as raised in the ccNSO 15 July letter. The SOPC suggests changing the wording to: "Evolve and promote ICANN's multistakeholder model to sustain a global and inclusive model for Internet Governance."

1. Are the strategic goals clearly defined and aligned with the strategic objectives?

Yes

Comments

The SOPC recognizes that Strategic Goal 1.2 - Enhance the Agility and Effectiveness of Policy and Advice Development – and the underlying Strategies add to achieving Strategic Objective 1. The SOPC also believes that enhancing ICANN's operational excellence, including enhancing the agility and effectiveness of policy and advice development, addresses the strategic risk under SO2, specifically on delivering on ICANN's mission. By including Goal 1.2 only under SO1, the process side may be undervalued. To ensure that the process is valued, the SOPC believes that a goal such as 1.2 on the agility and effectiveness of policy and advice development is needed under SO2. (See also section 4.2 of this SOPC submission)

2. Is the breakdown of strategic objectives into strategic goals helpful to understand how the objectives will be achieved?

Yes

3. Are there any strategic goals that need to be added, removed, or modified?

No

Comments

With respect to Strategic Goal 2.2: The SOPC believes that the key to organisational excellence in any organisation is its staff. Whilst the short explanation of this strategy 2.2.1 reads "attract and retain top talent", the link to how this part of strategic objective 2.1 will be achieved is missing. In the phasing (pages 15 and 16) we can see some ideas about implementing appropriate changes to offices, developing a hybrid working model, but in the view of the SOPC these strategies are not sufficient to achieve the goal of attracting and retaining top talent.

1. Are the strategies provided for each strategic goal clear and actionable?

No

Comments

As a general observation, the SOPC notes that the Strategies are very high level and therefore it is harder to assess their actionability and monitor progress in achieving the Strategic Goal. To illustrate this general observation, the SOPC noted the following: Strategy 1.1.1 - "the strategy is to ensure that ICANN's model evolves and has the mechanisms to incorporate new stakeholders as needed". Although the Progress Indicators for this Strategy provide more insight into the actions necessary to deliver the strategy, they are still at a high level e.g. "participation barriers are identified and addressed" (see answer to question 3 of this section) Strategy 2.2.1 - The SOPC notes that the term 'hybrid workforce model' may need more specificity to set expectations on how ICANN plans to balance in-person and remote work and how this model will be optimised across different regions. Strategy 2.2.2 - the SOPC notes that it is hard to criticise ecological responsibility objectives. However, in this area details matter. The SOPC believes that the relevant section of the Ops plan appears to be on point and starting with an audit and expert input is a good way forward. The strategies 3.1.1 and 3.1.2 require that "UA-ready" will be defined as that will drive the (scope of the) activities.

2. Are the strategies appropriate and effective for achieving the strategic goals?

Yes

Comments

The SOPC notes that some strategies may be applied to achieve multiple Strategic Goals. For example strategy 1.2.3 "Proactively Engage with Governments on threats to the interoperability of the Internet" might well relate also to Strategic Goal 1.3 "Expand Strategic Alliances." As noted under Section 3.1 above of this submission and depending on the focus of implementation of the Strategies under Strategic Goal 1.2, Strategies 1.2.1, 1.2.2 and 1.2.4 are also appropriate and necessary for Strategic Objective 2: Enhance Operational Excellence, specifically Goal 2.1 in addition to strategy 2.1.1 "Improve institutional agility and adaptability". The SOPC believes that although Policy and Advice Development is very visible, the Strategic Risk that needs to be addressed is under SO2: ICANN must deliver on its mission. The SOPC also believes that with regards to Strategies 1.3.1 and 1.3.2, it is important to enhance the relationship between ICANN and ccTLDs to ensure the effectiveness of the collaborative efforts included under these Strategies. For that matter, the SOPC reiterates its comment on the Operating Plans from the previous years that to be most effective in this area, closer cooperation between ICANN and the regional ccTLD community or individual ccTLDs and or other regional or national stakeholders is beneficial to strengthen these strategies. It will also avoid misunderstandings, which in the past unfortunately have had a negative impact on the relationship between ICANN and ccTLDs. Regarding 4.1.1- Reference is made in the planning documents to DNS-OARC, IETF and ITU as reputable forums. From a ccNSO perspective, ICANN is strongly encouraged to actively participate in events hosted by CENTR, APTLD, AFTLD and LACTLD. We suggest adding "increase cooperation with regional organisations such as CENTR, APTLD, AFTLD and LACTLD". The SOPC notes that the inclusion of a commitment to Universal Acceptance, as outlined in 3.1.1, is a positive development. Similarly, specifically identifying 4.1.2 (proactively identifying security risks) is a positive development.

3. Are the progress indicators associated with each strategy adequate for tracking progress?

No

Comments

The SOPC is pleased to note the continuous improvement in developing the Key Performance Indicators or Progress Indicators. However, to reiterate our comment on the Operating Plans, the SOPC believes more effort both by ICANN and the community should be put into developing these indicators to support a sustainable process of improvements, with a disciplined, data-driven approach. Specifically, the Progress Indicators will benefit from further work on the definitions of measures and metrics, source of data, and annual review. In addition, the SOPC believes that a core requirement is that Progress Indicators should adequately reflect and measure core aspects of very general Objectives and/or Goals. For example, one of Progress Indicators related to Strategic Goal 1.1. is "Participation barriers are identified and addressed". It needs to be detailed as: 1) the barriers identified 2) the response area developed 3) the measures specified 4) targets set 5) progress measured 6) progress reviewed. The SOPC also notes the heavy reliance on surveys (surveys are at least

mentioned in 19 different instances) ranging from a tool to implement a strategy (for example related to goal 1.1.2 to Establish a baseline survey for Year 0 to collect feedback and understand the current conditions of community collaboration, then identify areas for improvement and implement necessary changes in collaboration with the community), to measure progress regularly (for example satisfaction surveys). Although the SOPC believes surveys can be adequate tools, it also believes that due to survey fatigue, general lack of responsiveness etc, over time the surveys as a tool will become inadequate for the purpose they are designed and conducted in the first place. In addition, surveys (e.g. satisfaction surveys) need to be repeated in order to determine progress or the level of implementation or maturity, which would further increase the number of surveys. The SOPC suggests critically reviewing the number of surveys and considering whether they are the most appropriate tool for measurement.

4. Do the strategic risks identified for each strategy seem comprehensive and realistic?

Yes

Comments

With regard the Strategic Goal 1.3 "Expand Strategic Alliances to Advocate for the Multistakeholder Model of Internet Governance" more work is needed on the Strategic Risk for this goal to adequately reflect the challenges identified in the draft Plan, such as the importance of preserving an inclusive governance model, both within ICANN and in the broader Internet governance landscape, the need to pursue organisational excellence and specifically the related concerns the ccNSO raised in its 15 July letter to the Board. See also the SOPC comments under Section 2.2 of this submission The SOPC believes that with respect to strategy 2.2.2 "Embed ecological responsibility into ICANN's operations" an additional strategic risk emerges that is not included under Strategic Objective 2. The SOPC believes that a balanced approach between ecological impact and organisational cohesion needs to be ensured. Not achieving such a balance is a Strategic Risk not yet identified. Related, although the Draft Plan could go further in its ecological commitments, the SOPC is also concerned about overemphasis of ecological responsibility. The emphasis might result in outcomes that leave everyone somewhat dissatisfied. To address these risks, the SOPC suggests reverting to clearly defined ESG (Environmental, Social, and Governance) strategies and include a reference within the document. Further, the SOPC agrees with the statement that is related to the potential detrimental impact of too much ecological responsibility i.e. the need to '...achieve a balance between multistakeholder effectiveness and ecological impact...' However, in the view of the SOPC the reverse is a Strategic Risk that needs to be included in the risk section. To the extent this has not yet been done, the SOPC suggests ICANN includes in its risk management framework the potential adverse effects of these ecological initiatives on organisational cohesion. For avoidance of doubt, the SOPC commends ICANN for avoiding superficial ESG commitments, or 'ESG washing.' The SOPC compliments ICANN with the light text on the risks in terms of financials (SO2), which are very effective. Most people glaze over with 20-30 pages of legal text surrounding financial risk. However, the financial risks in the Strategic Plan are very well communicated.

5. Do you have any suggestions for additional strategies, progress indicators, or improvements to the existing ones?

Yes

Comments

The SOPC refers to the comments in questions 1, 2 and 3 in section 4 of this SOPC submission. Nevertheless, it would be a success for ICANN and the community as a whole if we achieve what is set out in the Strategic Plan 2026-2030.

1. Are the key activities outlined in the operating plan clearly defined and understandable?

Yes

Comments

Regarding Strategy 2.2.2 - This section of the Ops plan appears to be on point and starting with an audit and expert input is a good way forward. Regarding Strategies 3.2.1, 3.2.2 the SOPC suggests to add and highlight further specificity (for example, Blockchain technology)

2. Do you agree with the phasing approach for each strategy?

No

Comments

The SOPC appreciates the phasing approach in general. In the view of the SOPC, it provides an insight in how ICANN views the urgency i.e level of priority to execute a specific Strategy at the time of drafting the Strategic Plan and related draft Operating Plan. With regard to specific strategies we believe that the phasing of the following strategies needs to change: Strategy 1.3.2 "Strengthen collaborative efforts promote the MSM of Internet Governance" SOPC does not agree with prioritisation of this strategy. It is currently marked with blue colour meaning that ICANN's planned efforts and priorities in the coming years are suggested as "INCREMENTAL IMPROVEMENTS, MODERATE ATTENTION", meaning "strategies and actions that involve enhancing current activities and potentially introducing new initiatives or projects. They require moderate resources and attention and aim to build on existing efforts with incremental improvements." This does not accord with ccNSO concern as expressed in the 15 July letter to ICANN Chair and CEO. The SOPC suggests this strategy is given higher priority and marked with orange colour meaning STRATEGIC INTENSITY, HEIGHTENED ATTENTION

3. Are any key activities too ambitious or unrealistic?

No

4. Are there any strategies that are not adequately addressed in the Operating Plan?

Yes

Comments

The SOPC notes that under Strategy 1.1.1 the NomCom is not mentioned in the Continuous Improvement program effort. Regarding Strategy 1.3.2 "Strengthen collaborative efforts to promote the MSM" - As mentioned in the answer to question 2 (above), the SOPC urges ICANN to increase the level of attention from incremental improvements, moderate attention to strategic intensity, heightened attention. The proposed actions should involve ICANN building a strong coalition and taking the lead over the next years to develop actionable ideas to assist others to promote the MSM. The SOPC believes that the current efforts, including among others publishing blog posts and event attendance, are not sufficient. Regarding Strategy 1.2.3 Proactively engage with governments and other stakeholders - this is listed as requiring an INTENSE focus. However, the activities proposed to implement this strategy are INCREMENTAL rather than INTENSE. As described and as currently positioned, the key activities listed only address ICANN's role and do not address the broader risk associated with the Internet governance ecosystem losing confidence in the multistakeholder model as a whole. The SOPC did not see any reference to efforts to target specific audiences (other than a general reference to "governments and other stakeholders, as well as policymakers and regulators"); nor does the SOPC see any intention to help share and lead broad coalitions and alliances to advocate the strategy. Regarding Strategy 2.2.1 - The key of organisational excellence in every organisation is its staff. While in the short explanation of SO2 we read "attract and retain top talent", we lack clarity on how to achieve this objective. Changes to offices or development of a hybrid working model are not enough to achieve the goal to attract and retain top talent. The SOPC notes that Strategies 1.2.3 and 1.3.2 on the

Multistakeholder Model need to be reviewed with 1.3.2 needing to be stronger. The SOPC also notes that Strategic Goal 2.2 is described as Enhance ICANN's Global Presence and Impact to "meet the needs of the community, Board and org" but really describes internal operational arrangements such as the hybrid working model, office layouts.

5. Are there any overlaps or redundancies in the proposed key activities that could be streamlined?

No

1. Overall, how satisfied are you with the draft Strategic Plan?

Satisfied

Comments

The SOPC finds the strategic objectives well formulated and clearer compared to the previous plan. With respect to the structure of the Strategic Plan the SOPC wonders whether the order in which the strategic objectives are presented, follows any order of importance or priority?

2. Overall, how satisfied are you with the draft Operating Plan?

Satisfied

Comments

The SOPC commends ICANN with providing the clear linkage between the 5Y Operating Plan Framework to the Strategic Plan with great visualisation, phasing and key activities. This has lowered the complexity of the Strategic Plan, which the SOPC also requested. The SOPC especially appreciated the visualisation and explanation of the evolution of strategic objectives from the previous strategic plan

4. Other General Comments

The ccNSO Strategic and Operational Planning Committee (SOPC) welcomes the opportunity to comment on ICANN's Draft Strategic Plan and Operating Plan Framework for fiscal years 2026–2030. As always, the SOPC understands that not all of its suggestions may result in adjustments to the draft plans and framework. In that case, the SOPC appreciates ICANN's feedback on the rationale.

Overall, the SOPC finds that ICANN's Draft Strategic Plan and Operating Plan Framework are tailored for Continuous Improvement. The SOPC strongly supports such an approach as it indicates that an institutional effort is being made to continuously improve ICANN in the broadest sense. The bottom-up nature of ICANN may well be conducive for decentralised decision making, and allow for iterative change to be effectively implemented and measured.

The SOPC appreciates and commends ICANN for its continuous efforts to make the planning documents more accessible to the general public.

With respect to the Guided Submission Form for this proceeding, the SOPC notes that the binary response options leave little room for nuance. If other options between "yes" and "no" had been proposed, we would have chosen "mostly yes, but some corrections need to be made". The SOPC has attempted to provide nuance in the comments.

The SOP Working Group was established at ICANN's Cairo meeting in November 2008. The Working Group became a Committee in November 2017. The purpose of the Committee is to coordinate, facilitate and increase the participation of ccTLD managers in ICANN's strategic and operational, planning and budget processes. Membership of the Committee is open to representatives of all ccTLD managers (members and non-members of the ccNSO).

In accordance with the SOPC Charter, the Committee may, as part of its activities, take a position on its own behalf and/or provide input to the requests for comments and subsequently report back to ICANN or other supporting organisations and advisory committees. Therefore, the views expressed in this submission are those of the SOPC only. They are not necessarily those of the ccNSO (Council and/or its members), nor of the ccTLD community at large, nor of individual ccTLD managers.

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