RrSG response to Draft ICANN FY25 Plans

The Registrar Stakeholder Group (RrSG) appreciates the opportunity to comment on the [Draft ICANN FY25 Plans](). Overall there are no significant concerns and generally the information and level of detail provided is good. The RrSG has a few specific suggestions below.

In the IANA FY25 budget, there is an increase in headcount between Actual FY23 and Budget FY25 and it would be useful to see a breakdown and justification for this change.

In the IANA FY25 – FY29 plan and budget 13 new staff are forecast to be hired FY24 for new gTLDs and 15 are budgeted FY25 (page 13 of the highlights report). This seems to be a high number of staff and it would similarly be useful to have more information and justification for this.

This was not considered in the reports, but the RrSG has some concerns for ICANN's consideration around financial security for registrars regarding payment fraud during the Add-Grace Period (AGP). Some bad actors are increasing the pressure on registrars by registering large numbers of domains, using fraudulent credit cards or by hacking registrars or registrant's accounts. This could have an impact on new fees and on the financial health of the registrars, the fees paid by registrars to registries, and the ICANN fee collected by every registar for each year of domain registration, renewal or transfer.

Finally, the RrSG suggests that ICANN begin to consider its impact on climate change, and for opportunities to reduce or offset its carbon footprint, and to plan accordingly due to the potential financial impact of such actions (and the potential financial impact of not taking any action). This can include the technology that powers the DNS, and ICANN meetings. The COVID-19 pandemic reinforced the importance and productivity of in-person ICANN meetings, however ICANN and the community should take steps to mitigate the impact on the climate. Some participants in the ICANN ecosystem are already addressing these concerns, which can be leveraged to benefit the entire ICANN community.