

Response to Documentary Information Disclosure Policy Request

To: Aditya Garg

Date: 21 August 2015

Re: Request No. 20150722-2

Thank you for your Request for Information dated 22 July 2015 (“Request”), which was submitted through the Internet Corporation for Assigned Names and Numbers’ (“ICANN’s”) Documentary Information Disclosure Policy (“DIDP”) on behalf of The Centre for Internet & Society (“CIS”). For reference, a copy of your Request is attached to the email forwarding this Response.

Items Requested

Your Request references CIS’ prior DIDP Request No. 20141222-1 (*see* <https://www.icann.org/resources/pages/20141222-1-2015-01-22-en>) and now requests the disclosure of the “raw data with respect to granular income/revenue statements of ICANN from 1999-2011.”

Response

Your Request seeks the same information requested in your prior DIDP Request No. 20141222-1. Whether in a “detailed report” (as requested previously) or as “raw data” (as requested here), the same information is being requested and the same burden noted in ICANN’s prior response is still applicable.

As noted in response to your prior DIDP Request No. 20141222-1, ICANN makes available a comprehensive set of materials on its website as a matter of course, including but not limited to ICANN’s current and historical financial information. Financial materials for each fiscal year from FY99 thru FY15 can be accessed through ICANN’s Financials page at <https://www.icann.org/resources/pages/financials-2012-02-25-en> and contain the following financial information: Strategic Plan; Adopted Operating Plan and Budget; Adopted SO/AC Special Budget Request; Audited Financial Statements; Annual Reports; Federal and State Tax Filings; Staff Remuneration Practices Framework; Board Compensation Report; ccTLD Contributions Report; and Financial Analysis. (*See* <https://www.icann.org/resources/pages/financials-2012-02-25-en>.)

In addition, in response to your prior DIDP requests in September 2014 and December 2014, ICANN has prepared and published reports for FY13 and FY14 (and is in the process of preparing and publishing a report for FY12) entitled “Revenue Detail By Source,” which summarize the income and revenues received from each legal entity and individual, and are available on ICANN’s Financials page. (*See* <https://www.icann.org/resources/pages/financials-2012-02-25-en>.) ICANN also has indicated that it will prepare similar reports on a go-forward basis and publish them on its Financials page. (*See* <https://www.icann.org/resources/pages/financials-2012-02-25-en>.)

As noted in response to your previous DIDP request, information regarding ICANN's income and revenue for the years 1999 to 2011 can be found on the Financials page in the Operating Plan and Budget, Audited Financial Statements, Annual Reports, Federal and State Tax Filings, ccTLD Contributions Report, and Financial Analysis for each respective year on the financial page. (See <https://www.icann.org/resources/pages/financials-2012-02-25-en>.)

Your current Request for the "raw data" for FY99 thru FY11 imposes the same burden as the "detailed reports" requested in your prior DIDP request. ICANN does not have the FY99 thru FY11 data in the same format as more recent years, as the data is stored on a different system than the data for the years 2012 to the present. In addition, it would be extremely time consuming and overly burdensome to access and review all of ICANN's financial data for FY99 thru FY11 in order to identify the raw data applicable to your Request. This burden is particularly onerous when, as noted above, relevant information is available in other publicly available documents. Moreover, the Request is overbroad as to time and is subject to the following DIDP Defined Conditions of Nondisclosure:

- Information requests: (i) which are not reasonable; (ii) which are excessive or overly burdensome; and (iii) complying with which is not feasible.

Please note that ICANN is charged with using its resources in the public benefit. To that end, we are committed to continue improving our financial reporting to the community and will do so as our tools and resources allow. Once the FY12 Revenue Detail By Source document is published we will notify you. We thank you for your continued interest in our efforts.

About DIDP

ICANN's DIDP is limited to requests for documentary information already in existence within ICANN that is not publicly available. In addition, the DIDP sets forth Defined Conditions of Nondisclosure. To review a copy of the DIDP, please see <http://www.icann.org/en/about/transparency/didp>. ICANN makes every effort to be as responsive as possible to the entirety of your Request. As part of its accountability and transparency commitments, ICANN continually strives to provide as much information to the community as is reasonable. We encourage you to sign up for an account at MyICANN.org, through which you can receive daily updates regarding postings to the portions of ICANN's website that are of interest because, as we continue to enhance our reporting mechanisms, reports will be posted for public access.

We hope this information is helpful. If you have any further inquiries, please forward them to didp@icann.org.