

## Seat Allocation – NCSG Parity and EPDP-Based Compromise Option

Dear Charter Drafting Team,

Following the recent exchanges on Working Group composition, I would like to clarify the NCSG position and place a concrete, workable option on the table.

Our baseline position remains unchanged: in a closed, membership-based PDP, the NCSG should be allocated representation equal to that of the CSG, consistent with Council-level parity and prior PDP practice. Equality of representation between stakeholder groups is structural and should not be reopened in the context of charter drafting.

That said, during the EPDP on Registration Data, a practical compromise was adopted when similar concerns arose. Under that approach, the NCSG was treated both as a stakeholder group and through its constituencies, allowing representation to be allocated in a way that preserved parity without inflating influence or undermining manageability. We are prepared to accept a similar arrangement.

Under this EPDP-based compromise, the NCSG, NCUC, and NPOC would each receive representation equivalent to that allocated to other constituencies. This applies the same logic consistently across stakeholder groups and avoids penalizing the NCSG for its internal governance model.

The resulting allocation would look as follows:

Group / Constituency	Members	Participants	Alternates
RrSG	4	2	1
RySG	3	1	1
BC	2	1	1
IPC	2	1	1
ISPCP	2	1	1
NCSG	2	1	1
NCUC	2	1	1
NPOC	2	1	1
ccNSO	2	–	1
ALAC	2	–	1
GAC	2	–	1
SSAC	2	–	1
RSSAC	2	–	1
Total	29	9	13

To be clear, this is not our preferred outcome. Our preference remains straightforward parity between the NCSG and the CSG. However, if representation is being allocated on the basis of constituencies rather than stakeholder groups, then that logic must be applied consistently, including to the NCSG.

We hope this provides a constructive and precedent-based way forward and allows the drafting team to focus on finalizing a charter that is both legitimate and workable. For the future PDPs and other groups, the parity of stakeholders at NCPH has to be respected and should not be debated.

Best regards,  
Farzaneh