2000 is natively NTFS but could be installed as a FAT32 and possibly FAT16. But DOS/95 are FAT and 95OSR2/98/98SE/ME are FAT32
3.1x was just a shell for DOS and a lot of people do not consider it a true GUI OS.

NTFS does not use DOS. It has something similar in the Command Prompt, but it is not DOS. I dare you to go to a hard core IT person and tell him to open the "DOS window" in Server 2000.