INTRODUCTION

MarkMonitor welcomes the opportunity to comment on ICANN's FY 14 Security, Stability and Resiliency Framework. Ensuring the security, stability and resiliency of the DNS is an important part of the success of the commerce functions of MarkMonitor clients, and we applaud ICANN's effort to perform this role in an open, accountable and transparent manner, inclusive of the diversity of stakeholders in the greater Internet ecosystem.

SECURITY AND RESILIENCY CONCERNS

ICANN has defined "Security" as "the capacity to protect and prevent misuse of Internet unique identifiers," and "Resiliency" as "the capacity of the unique identifier system to effectively withstand/tolerate/survive malicious attacks and other disruptive events without disruption or cessation of service."

MarkMonitor supports the commitment of ICANN work with law enforcement and/or government agencies to ensure that illicit behavior and malicious use of the DNS is quickly and thoroughly resolved, and we applaud the work that ICANN and law enforcement have done in this regard, particularly the integration of law enforcement recommendations in the new Registrar Accreditation Agreement. We encourage ICANN to strengthen and expand compliance efforts to ensure proper enforcement of its contracts with third parties, such as domain name registration providers, where appropriate to continue to address security and resiliency concerns.

Although we acknowledge that ICANN does not have a contractual relationship with ccTLDs which requires support regarding security and resiliency, we request that ICANN consider providing support and funding to ccTLDs in this regard, particularly in light of the well-publicized hijacking of ccTLDs. We believe that supporting additional security for ccTLDs will increase their stability and availability, thereby increasing the role ccTLDs play in the global Internet infrastructure and enhancing choice and access.

STABILITY CONCERNS

ICANN defines "Stability" as "the capacity to ensure that the system operates as expected, and that users of the unique identifiers have confidence that the system operates as expected." MarkMonitor would like to highlight the importance of expectation and confidence, and would like to encourage ICANN to operate more transparently to instill confidence in the community that the DNS is ready for the unrivaled expansion presented by the new gTLD program.

We note with concern that the report characterizes the work of ICANN's Security team as "not always visible or public," while acknowledging that transparency is a key aspect of ICANN's Management Delivery Structure. It is ultimately counterproductive for ICANN to be secretive (intentionally or otherwise) regarding the work of the ICANN Security team. As was noted by

Verisign in March, 2013 in its report to the United States Securities and Exchange Commission, there are major concerns about the ability of the DNS to handle the expansion of the gTLD space. Although the SSAC addressed these concerns at the ICANN 46 meeting in Beijing, MarkMonitor would like to encourage ICANN to be more open, specific and transparent about the readiness of the DNS. It is important to instill confidence in the Internet community regarding these potentially valid stability concerns.

Additionally, MarkMonitor encourages ICANN to address concerns about scaling vital functions related to the DNS, such as WHOIS (New gTLD Directory Services).

CONCLUSION

Overall, MarkMonitor is encouraged by the work of the ICANN Security team and the information provided in the FY14 SSR Framework, and we look forward to the implementation of the ideals contained therein.

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Respectfully Submitted,

MarkMonitor, Part of Thomson Reuters

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