



## **AT&T Comments on Security, Stability and Resiliency Framework May 20, 2013**

AT&T Inc. (AT&T), on behalf of its affiliated companies, appreciates the opportunity to submit comments on ICANN's draft Fiscal Year 2014 Security, Stability and Resiliency ("SSR") Framework. ICANN has made good progress clarifying its SSR responsibilities and establishing a baseline framework for tracking specific priorities and progress in fulfilling these responsibilities. AT&T recommends that ICANN continue to refine the FY14 SSR Framework, with a particular focus on maturing internal security efforts and managing SSR-related issues in conjunction with the introduction of the new generic Top Level Domains ("gTLDs") program.

### **Part A – Foundational Section for ICANN's Role**

The FY SSR Framework includes a restatement of ICANN's mission and core values, as well as a description of its role and remit. This is informed by public comments and discussion, which was a recommendation of the SSR Review Team. AT&T supports ICANN's statement of its technical mission as encompassing three categories of responsibilities, which ranges from areas of operational management to areas where ICANN engages with others in the global Internet ecosystem. Also, the addition of a definition of "Unique Identifier Health" is a helpful concept which conveys the fact that SSR extends beyond a narrow focus on security and instead encompasses broader responsibilities, such as resiliency and availability.

AT&T recommends that, in addition to describing its three categories of responsibilities in the Foundational Section, ICANN should go a step further and organize its planned SSR activities and initiatives in FY 14 according to these categories of responsibilities as well. This will help provide transparency about how ICANN is adhering to its remit and allocating resources across its three categories of responsibilities.

Moreover, as ICANN finalizes the FY 14 SSR Framework, it should continue to stay focused on fulfilling its core mission and operating within the scope of its remit. The incorporation of additional information about the nature of the Internet ecosystem into the SSR Framework itself is helpful in illustrating the complex nature of ICANN's SSR responsibilities and the importance of ICANN's collaborative work both within and outside the ICANN community. We also support ICANN's established practice of including a statement identifying examples of responsibilities that lie outside the scope of its SSR remit.

### **Part B – FY 14 SSR Module**

ICANN has taken steps to improve the organization of its SSR priorities and initiatives in the SSR Framework, including a new list that links activities back to the SSR Review Team recommendations. AT&T supports efforts to sharpen the focus of the SSR Framework. In particular, we support mapping Security team activities and the SSR Review Team recommendations to ICANN's overall four management delivery areas. This will help ensure that ICANN appropriately prioritizes SSR activities and integrates these activities across the



organization. As AT&T knows from firsthand experience, security must be integrated into governance and operational activities in order to be effective.

The FY 14 SSR Framework creates a useful visualization of ICANN security that encompasses, risk management, threat awareness, coordination and technical engagement. It also describes the security organization and how it fits within ICANN's new matrix organizational structure. AT&T recommends that ICANN develop these general statements into a more detailed description of the security team role and how these responsibilities will be managed within the matrix organization.

ICANN includes a list of FY 14 activities in the SSR Framework and acknowledges the need to grow the security team and its budget. AT&T agrees that this list generally reflects the appropriate type of priorities for ICANN's SSR-related activities. As noted, however, AT&T recommends that ICANN organize its initiatives and activities according to its three categories of responsibilities. Further, ICANN should provide more detail about its security-related operational and coordination activities. We note that the current draft of the FY 14 SSR Framework provides less detail about these activities than it does ICANN's engagement and outreach activities.

AT&T recognizes that ICANN is in the process of implementing the SSR Review recommendations and developing its FY 14 budget and operating plan. ICANN indicates that the roles and responsibilities of the security team will be further refined with implementation of the management delivery structure, which will support the FY 14 budget, operating plan and next Strategic Plan. ICANN indicates that these additional refinements will respond to a number of the SSR Review Team recommendations.

As ICANN proceeds to develop this additional detail, AT&T recommends that ICANN establish a set of detailed priorities for its operational and coordination functions, building on the list included in the draft SSR Framework. The following are some specific activities where more detail would be useful for the ICANN community:

- delivery of a DNS risk management framework and completion of an assessment cycle;
- growing ICANN's enterprise risk management expertise to support the Board Risk Management Committee and evolving organization needs; and
- strengthening ICANN's internal networks, IT processes and information security.

We also recommend that ICANN expressly prioritize proactive management of SSR-related issues related to the introduction of the new gTLD program. While this is mentioned in the FY 14 SSR Framework, it should be expanded and developed for inclusion in the final version of the framework so the community understands how ICANN intends to manage these responsibilities as the new gTLD program is implemented.

Ultimately, the success of the FY 14 SSR Framework will be gauged by how ICANN follows through on its plans. Accordingly, budget and staff decisions must provide the resources for



ICANN staff to effectively fulfill its responsibilities. ICANN indicates that will continue to provide additional information about its SSR-related budget and specific priorities and activities in FY 14. This should be a data-driven process that is grounded in a pragmatic cost-benefit analysis. We look forward to seeing additional detail.

Finally, ICANN should continue to expand its public transparency efforts. The FY 14 SSR Framework, including the SSR Review recommendations tracking appendix, provide a solid foundation for making SSR-related information accessible to the ICANN community. ICANN also notes that it is developing a dashboard page on the ICANN website. We support these developments and urge ICANN to provide additional details as part of the implementation of the dashboard and other public SSR-related materials.