Asia Pacific Top Level Domain Association

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APTLD's comments on ICANN's Global DNS-CERT Business Case

With reference to ICANN's invitation for Public Comment on the Global DNS-CERT Business Case (http://www.icann.org/en/announcements/announcement-2-12feb10-en.htm), APTLD herein provides its comments.

APTLD shares the goal of maintaining security and stability of the Internet. We appreciate and welcome the opportunity for the community to consider closely and review the DNS-related SSR (security, stability, and resiliency). We would however appreciate a more detailed study and a fully developed business case, prior to any implementation of a DNS-CERT. Our specific areas of concern with the ICANN proposal are as follows:

Organisational framework

Currently, there are organisations/teams contributing to DNS security maintenance, such as DNS-OARC, different CERTs around the world and ICANN's own Security and Stability Advisory Committee (SSAC). Although these organisations work with different models, they are all commonly trusted by the community and are all well established in operations and cooperation among themselves. We need to consider if a centralised body like the proposed DNS-CERT is necessary. The maintenance of security and stability of the Internet depends on the trust on a framework by different global players. We are not convinced that a centralised, but globally supported framework could be efficiently set up and be more effective in responding to security issues than the existing network of local or specialised organisations.

Moreover, considering that the cooperation and communication amongst existing organisations is well established, it may not be cost-effective to complicate the information sharing channels by introducing yet another centralised body.

We submit that ICANN should first consider enhancing the work of the existing organisations, before creating yet another one.

Scope of Work

Security incidents arise from many different causes, not only from the DNS. A global team concentrating solely on DNS may not be an adequate response to the threats the Internet is facing currently. The situation calls for cooperation and collaboration amongst different experts, who exist in the said network of organisations, and it is expected that ICANN should play a part among these groups. We suggest that ICANN should look into facilitating the work and communication among these groups instead of taking up a part of the operational work shared amongst them.

Financial implication

An annual budget of US$4 millions is significant. In view of the existing security network, we cannot help but think that significant costs could be saved if ICANN would attend only in facilitating the communication and cooperation within the network, and leaving incident response operations to existing organisations.

APTLD would like to reiterate that we support ICANN participating in enhancing the security and stability of the Internet, and we appreciate ICANN's proposal. However, we believe that ICANN must look into how the existing network could be enhanced, before seeking to establish another organisation that requires significant resources, while there are significant doubts in its potential efficiency and effectiveness.