

Comments of the ccNSO Council on the

Draft Statement of ICANN's role in Security, Stability, and Resiliency of the Internet's Unique Identifier Systems.

The ccNSO Council welcomes this opportunity to express appreciation for the efforts of ICANN staff and to comment on the Draft Statement on ICANN's role and remit in Security, Stability and Resiliency of the Internet's Unique Identifier Systems as recommended in Recommendations # 1 and # 3 of the Security, Stability, and Resiliency Review Team (the "SSRT"), which relate specifically to the nature and scope of ICANN's SSR remit. These recommendations reflect the need for a clear and consistent articulation of that remit, as well as the need to appreciate and respect the interdependencies between and among organizations that also play important roles in this critical area.

The ccNSO Council also appreciates the extension of the public comment period on the Draft Statement at the request of the community.

The following statements are fully endorsed by the ccNSO Council.

Recommendation 1: ICANN should publish a single, clear and consistent statement of its SSR remit and limited technical mission. ICANN should elicit and gain public feedback in order to reach a consensus-based statement.

Specific guidance is sought on:

- 1. What does it mean "to coordinate at the overall level the global Internet's System of unique identifiers"?*
- 2. What are the limits of that coordination role?*
- 3. What does it mean to ensure the security and stability of the global Internet's unique identifier systems?*

The ccNSO agrees that a clear, comprehensive and community-endorsed statement of ICANN's SSR remit and its alignment with ICANN's limited technical mission would be a valuable tool. Such a statement could serve both as a guide for ICANN's SSR activities and a benchmark against which its performance may be measured. Moreover, as the report of the ccNSO Working Group on delegation and redelegation of ccTLDs clearly showed, the ccNSO shares the SSRT's concern about the use of consistent language: even seemingly minor and/or subtle changes in language and terminology can result in significant confusion and inconsistent practices over time. Accordingly, the ccNSO endorses the SSRT's call to develop and use a standard taxonomy for SSR purposes.

The ccNSO acknowledges the usefulness of dividing ICANN's SSR remit into conceptual parts, including its:

1. Internal corporate infrastructure (such as its own internal IT/security);
2. Limited and clearly defined operational responsibilities;
3. Role in coordinating and facilitating role and relevant community-developed policy, responsibilities and operational actions;
4. Engagement with others in the global Internet ecosystem on SSR matters.

The ccNSO believes that ICANN should prioritize these roles in the order stated, and should ensure that "coordination" and "engagement" activities are fully aligned with ICANN's limited technical role, consistent with vetted and public strategic plans, and reflect the specific characteristics of ICANN's relationship with other entities that play an operational and /or policy role related to the DNS and Internet addressing.

In performing these roles, ICANN should focus first on its internal corporate infrastructure. Although part of ICANN's own SSR remit, such infrastructure is primarily a matter of corporate governance and not an SSR remit via-a-vis other entities. In light of ICANN's

clear operational responsibilities, including the IANA functions, its operation of the L-Root server, and its contractual compliance function should be the primary focus. In particular, with respect to ICANN's management of the IANA functions, the ccNSO strongly supports a transition to robust "e-IANA" services, and to greater attention in defining benchmarks, objectives, milestones, and assessment mechanisms to measure ICANN's performance.

The ccNSO has long supported more clarity and precision with respect to ICANN's activities involving security "coordination" and "engagement" with others in the global Internet ecosystem regarding DNS security and stability matters. There are many stakeholders, both within and outside of ICANN, that have devoted considerable time and resources to improving the security, stability, and resilience of the Internet, and care must be taken to avoid duplicating or competing with these programs absent some identified gap.

The ccNSO believes that ICANN's role and activities related to coordination and engagement on SSR matters should be structured on the basis of the characteristics of ICANN's specific relationships with others in the Internet Ecosystem. These characteristics are determined by the nature of (or absence of) the arrangement ICANN has with other core operators in the DNS, and the policy remit and scope of the related ICANN Supporting Organization. For example, ICANN has entered into contracts with all gTLD registries and ICANN accredited registrars, which are critical mechanisms for maintaining and improving the security, stability and resiliency across the DNS system. With regard to ccTLD registries, ICANN and some of the ccTLD operators have expressed a commitment to further enhance the stability, security and interoperability of the DNS from a global perspective and for the benefit of the local and global Internet community in an evolutionary manner on the basis of a peer relationship. Information sharing, mutual assistance and capability building could be the major focus of the activities going forward.

Reviewing the Draft Statement of ICANN's Role and Remit in SSR, the ccNSO Council is of the view that such a Statement should be the outcome of a process and not the starting point. Taking into account the above and the comments made by others¹, defining (the scope and remit of) the SSR role and responsibilities of ICANN has to be related to that of others. This implies a common and shared understanding of the relevant roles and responsibilities involved in the SSR of the Internet's Unique Identifier Systems. As others have also already commented², the Phase 1 Report of the joint SO/AC DNS Security and Stability Analysis Working Group (DSSA WG) could provide a starting point for such a process.

The ccNSO Council agrees that a valuable tool in clarifying ICANN's role and remit is a reference to what it does *not* do i.e what is not included. This kind of clarification could help to manage external expectations and pressures.

Recommendation 3: ICANN should document and clearly define the nature of the SSR relationship it has within the ICANN community in order to provide a single focal point for understanding the interdependencies between organizations.

Consistent with this recommendation, it would be helpful to receive community feedback on ICANN's SSR relationships with others in the Internet ecosystem, including groups such as the root server operators, RIRs, Registrars, Standards bodies, law enforcement, CERTs, and operational security communities such as the Conficker Working Group, MAAWG, etc.

Open questions include:

- 1. What is ICANN's coordination role with root server operators? This relates to*

¹ - Comments of the GNSO ISPCP Constituency
- Reply Comments of RySG on Draft Statement of ICANN's Role and Remit in Security, Stability and Resiliency of the Internet's Unique Identifier Systems.

² Ibidem

Recommendation 1, question 1.

2. *Should ICANN develop a process for transitioning a root server should a root server operator cease that role?*
3. *What is ICANN's scope of responsibility for addressing an attack against root servers, or "against the DNS" general?*

The ccNSO agrees that the community would be better served by a clearer articulation of the roles and responsibilities of the various groups within and outside of ICANN that play important SSR roles, including root-server operators, ccTLD's registries and registrars, gTLD registries and registrars, Regional Internet Registries, and Internet Service Providers and the related Supporting Organizations and Advisory Committees, and their related working groups.

To conclude, the ccNSO Council appreciates and welcomes ICANN's staff effort to develop a single, clear and consistent statement on its SSR remit and technical mission (Section II, Background Draft Statement). However to fully appreciate and understand the scope of ICANN's Draft Statement, it should start with a description of all relevant entities and their roles and responsibilities and reflect ICANN's relationship with these entities in the different areas listed. As stated above, the ccNSO believes that defining and documenting ICANN's remit and roles and responsibilities in SSR are determined by, and must be structured in a manner consistent with ICANN's relationship with the other entities involved. The ccNSO Council is committed to assist ICANN in further defining and documenting its role with the ccNSO, ccTLD community at large and ccTLD's.

On behalf of the ccNSO Council

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