**ISP & Connectivity Providers Constituency**

**Constituency Comments on Root Scaling Study**

The ISPCP welcomes the report as the stability and security of the DNS is of prime importance to ISPs and the community that it serves. With so many changes to the system either already underway or imminent; DNSSEC, IPv6, IDN’s and the introduction of new gTLDs, it’s essential the impact of any additional load on the root servers is fully understood and carefully managed to ensure against failure. Ideally this study should have taken place earlier as all of the above changes have been on the horizon for a considerable period, which makes the case for a carefully controlled and well understood approach even stronger at the current time.

Within the report the roles and responsibilities of the actors in today’s operating environment are articulated, however further work is proposed in order to ensure there is a clear understanding of what is expected of root server operators in the future if the Internet is not to become constrained by existing technical limitations. Whilst currently there is capacity to extend the root within a carefully controlled and managed environment, the Internet will continue to grow and the technical community needs to join forces with all involved stakeholders to ensure the development of technical standards and policy meets future demands. Attention should specifically be paid to the potential need to upgrade root server and improve current provisioning mechanisms.

It is evident from the initial comments made by the community during the Seoul meeting that further quantified analysis is required in order to fully understand the full implications of the changes that are currently being considered. The ISPCP fully supports that view. Once the process is open and you start adding complexity to the root, ICANN has no way to stop the process; the ability to call a halt to any expansion of the use of the root should be an important part of any plan for expansion that ICANN proposes.

Difficult decisions will have to be made regarding priorities, although the ISPCP does not consider it’s a fundamental requirement to introduce all proposed changes in a serial manner, parallel changes should be possible within a measured, cautious and carefully controlled approach. It already seems apparent that DNSSEC will be introduced early during the New Year for some TLDs, justified on the basis of improving operational stability. In addition the fast track process for the introduction of CC IDNs is of immense importance to ICANN and must not be jeopardised in any way. Coupled with the high level of expectation over the introduction of new gTLDs, the imminent exhaustion of the Ipv4 address space and the resulting move towards IPv6, it is clear that a measured, cautious and carefully controlled approach offers the most pragmatic way forward.

With regard to the introduction of new GTLDs, discussions that are taking place over the possible ability for applicants to submit ‘Expression of Interest’ could provide potential benefits in handling that particular requirement.

Policy decisions which impact root scaling MUST carefully weigh the risks of making changes and always err on the side of caution and the need for an effective ‘early warning’ strategy to guard against failure is fully supported.

The ISPCP urges ICANN to develop a strategic approach that favours a controlled set of measured step changes that are carefully monitored, but also enables critical milestones to be met in a most timely and pragmatic manner. ISPs bear the brunt of consumer confusion and technical problems when new uses of the DNS affect the user experience; and plan to expand the use of the root should include an outreach and communication plan for ISPs that fully explains the risks to transit and connectivity providers and provides a strategy for limiting those risks.