SUMMARY AND ANALYSIS OF COMMENTS [1 October to 29 November 2009]

ROOT SCALING STUDY TEAM REPORT

Source: The full text of the comments may be found at http://icann.org/en/public-comment/#rsst-report

The comment period ran from 1 October to 29 November 2009.

Two comments came in during the comment period and three further comments arrived after that time.

All comments can be viewed at http://forum.icann.org/lists/rsst-report/

SUMMARY:

Multiple comments raise questions concerning the validity of the report.

In the Minds and Machines comment, "we also find this study – while well intentioned – severely flawed," and in Elaine Pruis's personal contribution, "The study is contradictory and several of the recommendations are unsubstantiated by the qualitative and quantitative evidence." and "ICANN should not employ the recommendations from the report without an internal review of the report, further development of the model, and affirmation of the findings from the root server operators."

In Richard Tindall's comment he states "The report tends to make broad, qualitative assessments and reaches conclusions that are not substantiated by quantitative results" and "Even some of the qualitative assessments smack of guesswork"

Further Richard raises the point that additional resources could solve some of the scaling issues "Root infrastructure management is an important but relatively straightforward job. It's activities, while critical, are not complex from technical or operational perspectives. Funds and expertise can be made available to root server operators who require them, and infrastructure and operations can be readily expanded to meet user needs."

Some of the comments call for further quantified analysis

From input on behalf of the ISPCP Constituency

"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."

<u>From AT&T</u>

AT&T urges ICANN to immediately initiate a follow-up study that addresses the specific issues raised in the Root Scaling Study, as well as the potential impact of root scaling on other parts of the DNS infrastructure, including Internet backbone, ISP and browser operations.

<u>From Richard Tindal</u>

"In my view there is a strong need for additional analysis and technical input before any recommendations from this report are acted on."

Further to the comments on the forum there was also a letter received with comments from:

<u>The Internet Architecture Board of the IETF</u>

This has various recommendations based on the report:

"The report suggests that the 'root-server requirements' (RFC2870, IETF BCP40, an IETF consensus document) needs review. The IAB has traditionally had a role in developing structures to review various technical issues that relate to the Internet. In this case, we believe that an update to such document is most appropriately prepared by the root-zone operators and reviewed for BCP status in the IETF. Were ICANN and/or the root operators to conclude that a standing open and collaborative forum, or some other arrangement, were needed to address issues such as root scaling or (as currently organized in parallel) review of technical DNSSEC design, the IAB would be willing to collaborate in organizing such body."

"The IAB supports the recommendation that the introduction of DNSSEC to the root has the highest priority" That ..."A slow and careful start of introducing Internationalized ccTLDs is suggested." and "We (The IAB) believe that no new generic names should be added to the root zone unless stable and robust policies can be established to manage growth with names of given type, and to deal with any problems that arise should demand for new names exceed a rate that can safely be absorbed by the system."

ANALYSIS:

It is clear from all comments that further study and more in depth analysis is required. The comments call for the need to quantify the results before they are acted on.

NEXT STEPS:

Both the Root Server System Advisory Committee and the Security and Stability Advisory Committee have been approached to provide feedback on the issue of roots scaling to the ICANN board. These resulted in the production of the RSST report and the TNO report.

COMMENTERS:

Jeff Brueggeman on behalf of AT&T

http://forum.icann.org/lists/rsst-report/msg00000.html

Tony Holmes on behalf of the ISPCP Constituency

http://forum.icann.org/lists/rsst-report/msg00001.html

Fred Krueger & Elaine Pruis for Minds and Machine

http://forum.icann.org/lists/rsst-report/msg00002.html

Elaine Pruis (In Personal Capacity)

http://forum.icann.org/lists/rsst-report/msg00003.html

Richard Tindal (In Personal Capacity)

http://forum.icann.org/lists/rsst-report/msg00004.html

Olaf Kolkman (IAB Chair) for the IAB

http://www.icann.org/correspondence/kolkman-to-ceo-board-14oct09-en.pdf