

ICANN FY 12 Security, Stability & Resiliency (SSR) Framework

Summary and Analysis of Comments

ICANN conducted a public comment period on the *FY 12 Security, Stability and Resiliency (SSR) Framework* from 2 May 2011 to 1 June 2011. Based on an informal request from the ccNSO, the comment period was extended on 12 May to 7 June 2011. Five comments were received in the forum (along questions submitted by the Registry Stakeholder Group on 10 May and responses from staff on 3 June 2011).

In addition, staff conducted briefings on the SSR Framework and ICANN activities in SSR prior to & during the comment period on the following dates:

- Security & Stability Advisory Committee preview on the SSR Framework – 7 April 2011
- At Large Advisory Committee open call preview – 26 April 2011
- ccNSO work team briefing call – 9 May 2011
- IT Sector Coordinating Council International Committee (Washington, DC) – 10 May 2011
- National Cyber-Forensics and Training Alliance, SpyEye/Zeus Conference (Pittsburgh, PA) – 19 May 2011

Summary of Comments

ICANN received input on the FY 12 SSR Framework from the ccNSO, Registry Stakeholder Group, the Business Constituency, and Thierry Moreau (individual in technical community). A detailed analysis of these comments is provided below.

Following from the FY 11 SSR Plan published in September 2010 and acknowledged by the ICANN Board at the Cartagena meeting in December 2010, ICANN condensed the SSR Framework into a more streamlined, less repetitive document and presentation format. Translations in 5 UN languages were posted simultaneous with the SSR Framework on 2 May 2011.

Main Themes

1. In briefings with the community, there was general support for the revised format and presentation of the FY 12 SSR Framework, as an improvement over previous versions of the SSR Plan. There was also support for the simultaneous posting of translations in 5 UN languages.
2. Both the ccNSO and the Registry Stakeholders Group asked for improvement of definitions used by ICANN in the SSR Framework, and precision on describing ICANN's remit.
3. There was support for an environmental scan to assess the current Internet security ecosystem and involve the broad community including enterprise users, Internet and government entities in that work.

The comment forum can be viewed at <http://forum.icann.org/lists/ssr-fy12/>.

Detailed Analysis

Stakeholder Comments – Individual – Thierry Moreau

Thierry Moreau pointed to a reference in the SSR Framework on the SysTrust audit for ICANN’s DNSSEC implementation and KSK management process. He noted that he is eager to see the release of the SysTrust audit, which he hopes will be released in the spirit of transparency.

Staff notes that the SysTrust audit has been completed and will be published for transparency. ICANN expects to receive a public link to the audit report so that it will be available for the community.

Registry Operators, TLD Associations and Internet Organizations

Inputs in this category were received from ccNSO and the Registries Stakeholder Group (RySG).

ccNSO

The ccNSO welcomed and shared ICANN’s recognition of the importance of maintaining the stability, security and resilience of the DNS and provided its comments on the FY 12 SSR Framework. The ccNSO comment focused on the length of time available for consultation on the SSR Framework, context and preparation of the Framework, definitional improvement and budget detail.

The ccNSO proposes that taking the bylaws and undertakings in Clause 9.2 of the Affirmation of Commitments as a guide, ICANN undertake a detailed environmental scan to assess the current Internet security ecosystem.

Staff notes that the ccNSO’s suggestion for an environmental scan is to some extent being taken up by the cross-community DNS Security and Stability Analysis Working Group. In the ICANN San Francisco meeting, the Board of Directors also resolved to create a working group to oversee the development of a risk management framework for the DNS and ICANN’s role (<http://www.icann.org/en/minutes/resolutions-18mar11-en.htm#1.4>).

The ccNSO also suggests that ICANN develop and communicate a clear vision for its work in SSR, defining benchmarks, objectives, milestones and a mechanism for assessing success in SSR activities. The ccNSO notes that it is important for this communication to demonstrate an evidentiary chain from environmental scan to gap analysis to strategic plans.

The ccNSO welcomed the attempted clarification on ICANN’s activities and where it perceives itself to engage as an operator, collaborator, facilitator and coordinator. The ccNSO believes it is important to make these differentiations and budget implications explicit for all SSR work. They note that ICANN could minimize stakeholder confusion and ally concerns by better defining a number of broad terms. For example, in referring to “DNS Operations”, the ccNSO suggests that ICANN should clarify what is encompassed by this term, the role ICANN sees itself playing, and where its operational responsibilities start and stop. They also suggest that greater detail be provided on terms such as “capacity building”, and descriptions of broad work programs.

Finally, the ccNSO would welcome greater detail on the budget to be allocated to SSR activities and the results it expects to achieve in return for its proposed investment.

Registries Stakeholder Group (RySG)

The RySG submitted a consensus comment on 7 June 2011 from the gTLD registries stakeholder group, appreciating ICANN's commitment to the security, stability and resiliency of the DNS. They note that it is good for ICANN to participate in discussions of relevant security issues in the broader Internet and government communities. The RySG notes it can be confusing when ICANN does not define and communicate its security and stability remit precisely and consistently.

The RySG also suggests that staff reference the RAPWG Final Report (<http://gnso.icann.org/issues/rap/rap-wg-final-report-29may10-en.pdf>) with the SSR Framework, as that working group spent time defining the scope and difference between domain registration abuse and malicious conduct using domain names. Staff notes that this report was referenced in the final FY 11 SSR Plan, and can be referenced again for the FY 12 Framework.

Earlier in the comment period, the RySG sent questions to staff on the FY 12 SSR Framework (posted for transparency in the comment forum, <http://forum.icann.org/lists/ssr-fy12/msg00000.html>). Staff responded and the responses can be viewed in the comment forum (<http://forum.icann.org/lists/ssr-fy12/msg00001.html>).

Business Community

A comment was received from the Business Constituency (BC) of the GNSO. The BC noted that it was not able to do a detailed analysis and response on the FY 12 SSR Framework, and it reiterated concerns expressed on 6 April 2011 to the Affirmation Review Team on SSR (see <http://forum.icann.org/lists/ssr-rt-issues/msg00004.html>). Staff notes that while this comment is useful, it would be beneficial for discussion of the FY 12 SSR Framework with the BC and hopefully there will be time for direct discussion on this document during the upcoming ICANN meeting in Singapore.

The BC noted its support for ICANN's continuing efforts to improve SSR and believes that attention should be focused on four areas of current concern:

1. Adequacy of measures to prevent DNS Abuse
2. Lack of collaboration with the enterprise community
3. Oversight and resources to ensure compliance obligations are enforced
4. Strategic planning for SSR should include the business user community

Staff notes that it did reach out to BC leadership to discuss the FY 12 SSR Framework and offered briefings. Staff also engaged business users in briefing the IT Sector Coordinating Council's International Committee (<http://www.it-scc.org/>), which includes a broad range of business users and members of the enterprise community.

The BC is encouraging ICANN to recognize timely enforcement of contractual compliance obligations and collaborative support for enterprise efforts to identify and address attacks that abuse the DNS. ICANN staff has engaged with several enterprise entities in dealing with domain name generation attacks & botnets, and will continue to do so.

Next Steps

The FY 12 SSR Framework will be provided to the ICANN Board for consideration the upcoming ICANN meeting in Singapore 19-24 June 2011. ICANN staff will conduct an open session for the community with remote participation on 22 June 2011 from 8-9am Singapore local time describing the inputs received and treatment in the SSR Framework going forward (<http://singapore41.icann.org/node/24797>).

Comments Received

Questions from Registries Stakeholder Group (RySG) - <http://forum.icann.org/lists/ssr-fy12/msg00000.html>

Responses from staff to RySG - <http://forum.icann.org/lists/ssr-fy12/msg00001.html>

RySG comments - <http://forum.icann.org/lists/ssr-fy12/msg00004.html>

Thierry Moreau - <http://forum.icann.org/lists/ssr-fy12/msg00003.html>

ccNSO comments - <http://forum.icann.org/lists/ssr-fy12/msg00002.html>

Business Constituency comments - <http://forum.icann.org/lists/ssr-fy12/msg00005.html>