



COMMENTS ON ICANN'S "FY11 Update to Plan for Enhancing Internet Security, Stability & Resiliency"

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Introduction

The Internet Society (ISOC) appreciates having the opportunity to comment on ICANN's FY11 "Plan for Enhancing Internet Security, Stability and Resiliency"¹.

ISOC appreciates and supports the Plan's statement of the scope of ICANN's role:

"ICANN acts in accordance with its bylaws in conducting multi- stakeholder, consensus-based processes, policies and programs, including those related to security, stability and resiliency.

- ICANN's role must focus on its core missions related to the unique identifier systems.
- ICANN does not play a role in policing the Internet or operationally combating criminal behavior.
- ICANN does not have a role in the use of Internet related to cyber-espionage and cyber war.
- ICANN does not have a role in determining what constitutes illicit content on the Internet.
- ICANN's role includes participating in activities with the broader Internet community to combat abuse of the unique identifier systems. These activities will involve collaboration with governments combating malicious activity enabled by abuse of the systems to assist in protection of these systems."

However, we are concerned that the following section of the Plan could be seen as describing an inappropriate interpretation, which leads to an unfounded assertion of ICANN and IANA's role in operating a trust anchor repository for the RPKI standard being developed at the IETF:

"ICANN, through management of the IANA functions, acquires the strategy and the responsibility of the stability, security and resiliency of the Internet number allocation system and ultimately, through the application of

¹ <http://www.icann.org/en/topics/ssr/ssr-draft-plan-fy11-13sep10-en.pdf>

Resource Public Key Infrastructure (RPKI), the global Internet routing system. This responsibility manifests in the need to implement a technically ideal application of the RPKI Single Trust Anchor, as noted by the IAB and NRO, and results in ability to fully certify the validity, right of use, and uniqueness of Internet number resources. ICANN and ICANN Staff have made substantial efforts in working with the IETF and other focus groups by engaging in the standards process, communicating with stakeholders, and deploying a (now retired) trial RPKI implementation.

ISOC does not see the basis for asserting ICANN's acquisition of such a strategy or responsibility. While secure and careful implementation of the RPKI system is essential, and maintenance of a single trusted root is key, the very purpose of the RPKI technology is to ensure that responsibility for operation and integrity of the Internet's routing system remains the shared responsibility of all stakeholders acting in cooperation. The use of a single trust anchor was a design consideration and not an assignment of authority or responsibility. The community has currently accepted IANA as a place to house that trust anchor, but they have not delegated the shared authority to either IANA or ICANN.

From our perspective, then, the text above should be adjusted to reflect ICANN's role as collaborator in RPKI implementation (through the IANA functions) and ultimately, maintainer of the root trust anchor (as ICANN, through the IANA functions, is the maintainer of the DNSSEC root trust anchor), not as having provided a basis for ICANN to acquire strategic responsibilities for the stability, security and resiliency of the entirety of the Internet's routing system.

The Internet Society shares with ICANN the recognition of the importance of the stability, security and resiliency of the Internet's routing system. We also share in the commitment to making that a reality in an appropriate fashion. We would be happy to work with ICANN and all other relevant members of the Internet ecosystem to ensure the full potential of RPKI is realized.

For further information, please contact:

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About the Internet Society

The Internet Society (ISOC) is a non-profit organization founded in 1992 to provide leadership in Internet related standards, education, and policy. ISOC is the organizational home of the Internet Engineering Task Force (IETF), the Internet's premier technical standards body. With offices in Washington, D.C., and Geneva, Switzerland, it is dedicated to ensuring the open development, evolution, and use of the Internet for the benefit of people throughout the world. For more information see <http://InternetSociety.org>