

**LACRALO's Spanish-Speaking Working Group on
DNS Stability, Security and Robustness**

**Comments from LACRALO's Spanish-Speaking
Working Group on the report submitted by the
DNS Security, Stability and Resiliency Review
Team**

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Working Group's Comments:

We commend the team on an outstanding job. Their work is an impressive summary of a complex topic. It is clear that the initiative started in December 2011 in Cartagena, and completed in March 2012 in Costa Rica, has come to fruition.

As a starting point, given that the word "resiliency" [*resiliencia*] does exist in Spanish, and is substituted with "flexibility" [*flexibilidad*] in the Spanish version, we ask that the word "flexibility" [*flexibilidad*] be replaced, as it does not fully reflect the meaning of "resiliency" [*resiliencia*].

Although we seek broad participation in general, we should adopt a more conservative stance when the focus is on security and stability. In this regard, we agree with those registries which believe that "extremely broad participation in some SSR issues may lead to SSR risks". ICANN's relation with the SNCC is far different from its relation with the RSSAC; hence, we understand further clarity should be considered for this Recommendation.

We believe Recommendations 3, 4 and 5 are extremely necessary to avoid the overlapping of functions and eventual conflicts among different organizations within ICANN.

LACRALO's Spanish-Speaking Working Group on DNS Stability, Security and Robustness

Recommendation 6: The language of this Recommendation does not reflect the discussion of Section 4 of the RT Report, which contains clearer proposals on how to organize and present the SSR framework.

Regarding Recommendations 11 and 12, it is also our understanding, in line with registries, that both Recommendations suggest a top-down approach, instead of the bottom-up approach we should adopt.

We would like to underscore the critical nature of risk assessment to protect DNS infrastructure. Hence, we believe this task is the starting point for future work, to be done not only by the SSRT, but also by the other constituencies, given that DNS security, stability and robustness is in everybody's interest, and that we should all work to reduce risks, both within and outside ICANN. This implies transparency (Recommendations 20 and 26) of results from plans put in place to evaluate whether they are effective or not (Recommendation 28), in order to make amendments as needed.

We agree with Recommendation 25, and would like to add that ICANN should publish this information periodically and

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uninterruptedly. It is imperative that ICANN perform outreach and inreach on this topic (Recommendation 26).

We agree with ALAC's statement in its reference to a formal security audit by means of risk assessment in terms of protecting critical infrastructure information.

This comment has been possible thanks to the very clear work of one of ICANN's Working Groups - something we have been able to access on few occasions. This document has enabled us to unravel every single Recommendation. Focusing on each Recommendation has been, indeed, highly rewarding. Once again, we would like to commend and thank this Working Group for the thorough and intelligently written report they provided to the community.

Regards,

Working Group: LACRALO DNS (DNS Stability, Security and Robustness) created on March 31, 2012.

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