neustar™

April 14, 2010

Mr. Peter Dengate Thrush
Chairman of the Board of Directors
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

Mr. Rod Beckstrom
President and CEO
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
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Dear Mr. Dengate Thrush and Mr. Beckstrom,

Neustar appreciates the opportunity to comment on ICANN's February 12, 2010 proposal related to Domain Name System Security, Stability and Reliability (SSR) and the Global DNS-CERT business case.

As a leading provider of domain name registry and mission-critical managed DNS services, Neustar is acutely aware of existing and emerging threats to the Domain Name System. We therefore welcome ICANN's efforts to promote dialogue around this important issue and look forward to contributing meaningfully to future discussions. However, Neustar has significant operational, financial, and procedural concerns regarding these two proposals. While we support ICANN's efforts to focus attention around issues of DNS security, we believe ICANN's proposals overreach and make assumptions that are not yet supported by concrete data and/or necessary community involvement and input.

Neustar supports the concept of a collaborative study of threats to the domain name portion of the DNS as suggested in Initiative 1, Section 5.1.1 of the SSR Proposal, and would welcome the opportunity to participate in working groups as suggested in Sections, 5.1.3 and 5.1.1.1. Neustar also supports the formation of a joint SO/AC Working Group as recommended by the Chairs of the ccNSO, GNSO and ALAC in their March 25, 2010 letter to ICANN. However, while the SSR proposal may be useful as a starting point for discussion, we believe it goes too far in advancing very specific structures and solutions that may or may not prove to be necessary, beneficial, or cost-effective. ICANN must now consult with stakeholders and seek community input to develop a mechanism with broad community buy-in, particularly if it is to require ICANN's funding and/or staff support.

Neustar believes the concept of a DNS-CERT has value and is worth further consideration. Due to the critical role of the DNS in today's global economy and communications systems, we support the goal of improved coordination in combating the exploitation and malicious use of the DNS. However, we believe ICANN has not yet adequately engaged or consulted with existing DNS security entities and DNS service providers to evaluate the threats or relevant resources, groups, and mechanisms. Entities such as the DNS Operations, Analysis and Research Center (DNS-OARC) already exist and could be an effective and less-costly alternative to the formation of a new group. Recommending the creation of a new structure without such outreach and community input is premature.

It is important to note that ICANN's role in relation to DNS is specifically with the ROOT and TLDs. With these two, except as the operator of the "L" root, ICANN is a policy body and coordinator of the TLD space with no operational role whatsoever. Other than gTLD DNS operators, who need to follow requirements of ICANN agreements with registry operators, DNS operations are carried out predominantly by organizations and entities with no relationship to ICANN. For example, companies and organizations such as IBM, Microsoft, Google, Fujitsu, and Yahoo! operate their own DNS and have no relationship with ICANN. Neustar would certainly expect ICANN to be a key participant in any future DNS-CERT, but we would not support ICANN's involvement in a funding or operational capacity.

Procedurally, Neustar is concerned that ICANN adopted a top-down approach to developing and introducing the DNS SSR and DNS-CERT business case proposals, particularly in that they include very short-term deadlines and deliverables for what the industry recognizes are complex issues. While both proposals have language about future collaboration and multi-stakeholder discussion, the near-term deliverables and resource projections suggest ICANN intends to move forward without adequate community input or clear jurisdiction. Until the DNS community (including those not already engaged in the ICANN process) has the opportunity to provide input on the proposed concept and on possible structures and solutions that might differ substantially from ICANN's proposal, inclusion of short-term deliverables and expense projections is premature.

We note that the first-year, start-up resource projection for 2010-2011 alone is $6.3 million for the two initiatives. As a contributor to ICANN's operating budget, Neustar is very concerned about those projected resource allocations. ICANN needs to explain to the community how it would fund such a significant incremental expense, and what existing programs would be impacted by any reallocation of funds. Further, we note the SSR proposal states (Page 1) *"These initiatives are proposed as efforts beyond those identified in the FY11 ICANN Operational Plan and Budget framework posted for discussion at the Nairobi meeting,"* yet there is a 26% increase of $1.45M for "SSR Operations" included in the Framework for the FY11 Budget and Operating Plan, totaling $7.3M. Also, Section 4.4 (pages 18 and 19) of the FY11 Framework (http://www.icann.org/en/planning/ops-budget-framework-fy2011-en.pdf) actually includes the specific activities recommended by these proposals. We look forward to clarification of this apparent inconsistency in the May 17, 2010 FY11 Budget and Operating Plan.

To summarize Neustar's comments and concerns, we believe ICANN has developed an expensive and apparently unfunded proposal without adequate stakeholder input. It is also unclear that such activities fit within ICANN's limited technical coordination functions. We thank ICANN for bringing attention to DNS security and look forward to further discussion and engagement on this important issue.

Sincerely,

Keith Drazek
Director, Industry and Government Relations
Neustar, Inc