April 14, 2010

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

Dear Board Members,

On behalf of the Internet Society, I am writing to express concern about recent developments brought forth by ICANN pertaining to the security and stability of the Internet. The Internet Society shares the global community's responsibility to preserve and improve security and stability for everyone who uses the Internet. However, in our view, any effort to improve security and stability must be based on substantiated facts and careful planning. During the Nairobi ICANN meeting, ICANN's Chief Executive Officer claimed that the Internet is under attack as never before; which has raised concern among many, yet the facts to substantiate that statement have not yet been made available to the community.

While acknowledging that there are security and stability challenges facing the domain name infrastructure, many recognized experts in DNS security and operators of key Internet infrastructure are on record saying they do not agree that the Internet is suddenly experiencing dramatically greater or new types of attack, or that the DNS, or the Internet itself, are likely to collapse at any moment. The Internet Society believes it is important for the community to work together through established processes and institutions, each within its mandate, to maintain and improve security and stability. ISOC believes the institutions of the security, registry and root server operator communities, for example, recognize the seriousness of attacks on Internet infrastructure; and the community is continuously stepping up activities (operational and development) to address them. The statements made in Nairobi did not say why ICANN believes those existing and planned activities are inadequate.

Nonetheless, in the context of its expressed concern for DNS security, ICANN has recently put forward two proposals to create a global DNS CERT capability. No doubt, vigilance is an important part of the community's efforts, as are capacity building efforts. The Internet Society has reviewed the ICANN proposals and, as a starting point, agrees that taking steps to strengthen global DNS security, stability and resilience is important. That said, we have strong concerns about how the proposals have been developed and their future path in the ICANN community. As with all important initiatives concerning the functioning of the Internet, ISOC believes it is vital to rely on the Internet model to get the best result. By the Internet model, we mean relying on open, bottom-up, freely accessible, public, multi-stakeholder, and knowledge-based processes for both technology and policy development.

While we agree that the security and stability of the DNS are vitally important, we are concerned that the current proposals do not show convincingly that there has been a full analysis of alternate approaches. ISOC believes the proposals have been put forward prematurely – without the full backing of the supporting organizations and advisory committees in ICANN, nor with the broader community, including the technical community. Specifically, there are many concerned with DNS security and stability from a variety of institutional, national and regional organizations, including from existing CERTs, who are not regular participants in ICANN processes yet who need to be engaged in any such discussion. That engagement should take place in the appropriate forums: often meaning that the relevant expertise exists outside of the ICANN process and community.

Finally, and consistent with the Internet Society's comments in several past consultations by and about ICANN, we continue to be concerned that ICANN may be broadening out from its principle mandate as coordinator of the global resource that is the domain name system into the management of new and peripheral operational functions. More specifically, the two proposals to create a DNS CERT capability could potentially distract ICANN from its narrow technical mandate and distract management's attention and resources.

For all the above reasons, ISOC strongly recommends that the "Proposed Strategic Initiatives for Improved DNS Security, Stability and Resiliency (SSR)" and the plan to create a global DNS-CERT be brought forward with the global Internet community to ensure that all relevant bodies have the opportunity to contribute to enhancing the security and stability of the Internet's domain name infrastructure.

Once again, the Internet Society offers these comments in the spirit of continued cooperation and collaboration. We remain committed to supporting ICANN as we work together to carry out our public service responsibilities.

Sincerely yours,

Lynn St Amour
President and Chief Executive Officer
Internet Society