



Internet New Zealand (Inc)

Submission to ICANN

on

Proposed Initiatives for Improved DNS Security, Stability and
Resilience

14 April 2010
Public Version (there is no confidential version)

For further information, please contact:

Jay Daley	.nz Registry Services	jay@nzrs.net.nz
Keith Davidson	InternetNZ	keith@internetnz.net.nz
Debbie Monahan	Domain Name Commission Ltd	dnc@dnc.org.nz

InternetNZ: Submission to ICANN on proposed initiatives for DNS Security, Stability and Resilience.

Table of Contents

1	Introduction.....	1
2	Relationship with other groups.....	1
3	Specific Initiatives.....	2
4	Recommendations.....	2

I Introduction

- 1.1 This submission is from InternetNZ (Internet New Zealand Inc).
- 1.2 InternetNZ is a membership-based, non-partisan, not-for-profit charitable organisation responsible for the administration of the .nz top level domain.
- 1.3 Our mission is to protect and promote the Internet for New Zealand; we advocate the ongoing development of an open and uncaptureable Internet, available to all New Zealanders.
- 1.4 InternetNZ has two wholly owned charitable subsidiaries to whom management, operation and regulation of the .nz top level domain are delegated. These are:
 - 1.4.1 .nz Registry Services, the Registry
 - 1.4.2 Domain Name Commission Limited, the Regulator
- 1.5 In summary, we note that ICANN, whilst acknowledging the work of the many groups already active in this area, is proposing quite a detailed and extensive role that cuts across much of that other work in an uncoordinated fashion and is of such extensive scope that it is impractical to deliver. It is unlikely that ICANN would be able to deliver anything useful if it fails to win the trust and cooperation of these other groups at this early stage. Consequently we do not support these proposals.
- 1.6 We have also submitted a response to the business case for a DNS-CERT that expresses many of our concerns on ICANN proposals in this arena, the approach taken and the flawed analysis of the current security situation.

2 Relationship with other groups

- 2.1 It is not clear to us how the proposed 'DNS Risk Assessment and Contingency Planning expert advisory group' is different from the SSAC. The ICANN web site page devoted to the SSAC gives the following explanation of its role, which overlaps significantly with the proposed new group:
 - 2.1.1 "SSAC engages in ongoing threat assessment and risk analysis of the Internet naming and address allocation services to assess where the principal threats to stability and security lie, and advises the ICANN community accordingly."
- 2.2 It is equally unclear how this new group relates to the RSSAC. Again, from the web site page devoted to RSSAC, we have:
 - 2.2.1 "the Root Server System Advisory Committee should review the number, location, and distribution of root name servers considering the total system performance, robustness, and reliability."

- 2.3 The major global effort to instrument and analyse the DNS is the Day In The Life (DITL) project jointly managed by DNS-OARC and CAIDA. This is an annual exercise in data capture undertaken by several root server operators and many TLDs, followed by several months of extensive data analysis by researchers. Yet no mention is made of this project in this proposal.

3 Specific Initiatives

- 3.1 We support the categorisation that identifies risks, contingency planning, instrumentation and modelling as areas where further work is required. However we do not support the proposals made, for the following reasons.
- 3.2 It is unclear where the boundary is between ICANN identifying and sharing information on the work already underway in other groups, and taking responsibility for this work itself. If ICANN is proposing taking responsibility itself then we would regard much of that as out of scope for ICANN.
- 3.3 While the proposal references the work of others extensively it does not show how these initiatives will interact with those others and whether it will support other groups, build on their work or attempt to replace their work. The proposal seems to suggest in different places that it will do all three.
- 3.4 The scope of the work and the promised deliverables are too wide and too ambitious. We think it unlikely that these could be delivered to any significant extent without a notable resource impact on the entire community and considerably more expenditure from ICANN than it is anticipating. For example, a biannual, global, coordinated test of contingency planning is clearly unrealistic.

4 Recommendations

- 4.1 We recommend that ICANN, as with the DNS-CERT, take a step back, slow down, withdraw the proposals, properly engage the community and find a consensus on what role it has to play in this arena.

With many thanks for your consideration,

Yours sincerely,

InternetNZ