

LegalNet Works Incorporated - Comments on ICANN Draft Strategic Plan

ICANN should undertake a proactive leadership role in the security and resiliency of the Internet -- especially in key areas that involve ICANN's considerable knowledge and positioning. These includes contingency planning, exercising DNS response capabilities, and coordinating closely with public and private stakeholders that lack the ability to effectively manage Internet security risks.

Summary

This document provides LegalNet Works Incorporated's ("LegalNet") comments on the Internet Corporation for Assigned Names and Numbers' ("ICANN") *July 2010-June 2013 Draft Strategic Plan* ("Strategic Plan"). While we feel the overall document is excellent, our comments are focused on the section of the Strategic Plan titled "Preserve DNS stability."

In sum, we believe the Strategic Plan provides a solid foundation for addressing serious challenges to the security the Internet. ICANN should undertake a proactive leadership role in the security and resiliency of the Internet -- especially in key areas that involve ICANN's considerable knowledge and positioning. These include contingency planning, exercising DNS response capabilities, and coordinating closely with public and private stakeholders that lack the ability to effectively manage Internet security risks.

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Formed in 1996, LegalNet consults with institutions in both the public and private sectors to manage strategic, organizational, and corporate governance demands. In the past 10 years, we have witnessed a growing demand for global leadership around challenges associated with the security of the Internet.

As ICANN is aware, corporate owners and operators are especially prone to global Internet risks. The corporate community is increasingly moving both core business functions and customer-facing activities to the Internet without being appropriately positioned to identify, assess, mitigate and manage key strategic risks. Even large market-cap and global

companies that allocate extensive resources may lack the ability to manage particular Internet risks.

Governments and public sector institutions are similarly struggling with ways to manage strategic Internet security risks. Like their counterparts in the private sector, governmental institutions do not have robust partnerships and operating relationships with owners and operators of key Internet infrastructure, including the Domain Name System (DNS). Even where such partnerships exist, public institutions are not constituted, authorized, or fully able to control DNS and other security challenges.

Public and private institutions require the ability to leverage a global monitoring, collaboration, and response system for DNS and related Internet risks. Such a system is essential to provide users with a common understanding of the risks as well as a common starting point to begin to assess, mitigate, and manage such risks.

ICANN is positioned to establish itself as a leader in this field and, at the very least, orchestrate the development of these capabilities. We see the development and execution of a model to implement the DNS CERT concept as paramount to the management of the risks associated with DNS. Of the functions provided by such a capability, we see the coordinated ability to develop comprehensive contingency plans and exercise the response systems of the Internet community around DNS security-related issues as being a significant step forward for the global Internet community.

While there are many organizations that may be able to provide such a capability, none have both the operational visibility and global reach that ICANN does. This unique positioning creates the potential to stand-up a DNS CERT a real possibility, even given the significant financial, political and operational challenges that would be presented. We are excited to see ICANN taking the lead on such a critical issue, and hope that the organization makes the development of this capability one of its top priorities in the next three years.

We appreciate the opportunity to comment on the Strategic Plan and look forward to ICANN's implementation.

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