**Nominet response to the Consultation on the ICANN Strategic Plan July 2011 – June 2014**

## Introduction

Nominet is the registry for the .uk country code top-level domain.  With over nine million registered domains, we are the second largest country-code top-level domain.

We have taken a leading role in the discussion and development of ICANN strategy over many years and are therefore pleased to have the opportunity to respond to the consultation on ICANN's Strategic Plan July 2011 – June 2014.

## General Comments

Nominet is an active member of the ccNSO and we support the comments made in the letter from the ccNSO to ICANN (http://ccnso.icann.org/node/16181 9 December 2010 from Chris Disspain, Chair of the ccNSO to Peter Dengate Thrush, Chair of ICANN).

We are concerned that the delays show that the planning process has not been given sufficient priority at a senior level in the organisation.  The strategic plan is a fundamental part of the planning cycle.  We believe that ICANN should establish an organised process that it can commit to for the preparation of the strategic plan.

## DNS stability and security

We support the priority given to DNS stability and security:  see for example our comments in response to the 2010-2013 Strategic Plan – http://forum.icann.org/lists/stratplan-2010/pdfECBpFe5R2K.pdf.

In particular, for the proposal for a DNS-CERT, we have previously commented on the proposals for Strategic Initiatives for Improved DNS Security, Stability and Resiliency and for a DNS-CERT (http://forum.icann.org/lists/strat-ini-ssr/pdfjBQrLYoyF9.pdf), and on the FY 11 Update to Plan for Enhancing Internet Security, Stability & Resiliency (http://forum.icann.org/lists/ssr-plan-fy11/pdfJWw1FhfJ42.pdf).

We welcome the intention of responding to community input on issues of Internet security. However, it is inappropriate to have an explicit reference to the idea of a DNS-CERT, which appears to prejudge the work of the cross-community working group before that work has even started.  It also appears to limit the work of the Joint DNS Security and Stability Analysis Working

Group (DSSA–WG, draft charter at http://ccnso.icann.org/announcements/announcement-15nov10-en.htm), which has the objective:

> "to draw upon the collective expertise of the participating SOs and ACs, solicit expert input and advice and report to the respective participating SOs and ACs on:
>
> A. The actual level, frequency and severity of threats to the DNS;
> B. The current efforts and activities to mitigate these threats to the DNS;  and
> C. The gaps (if any) in the current security response to DNS issues.
>
> If considered feasible and appropriate, the DSSA–WG may identify and report on possible additional risk mitigation activities that it believes would assist in closing any gaps identified under item C above."

We believe that the sentence in the draft strategic plan could better read:  "ICANN will follow the *work* of its *cross*-community working groups to develop an approach to the establishment of *appropriate* solutions to address issues of Internet security."

We would also note that the recent survey on DNS Security Survey for National Computer Security Incident Response Teams did not have a statistically valid response rate to draw any broad conclusions or to justify any decisions on the way forward.

We are not familiar with the term "bully pulpit", but it conveys an inappropriate connotation for what needs to be a community effort.  We believe that the community in general behaves responsibly and has a good record in addressing security, stability and resilience issues.  Hence it would be better to express this less in terms of bullying and more by underlining the importance of developing common community understanding, for example as, "… and certain areas where we can help influence thinking or question assumptions."

Under "Coordinate DNS global risk management", it should perhaps be made clear that this refers to gTLD registry and ICANN accredited registrar continuity planning.  We welcome ICANN working with the community (and in particular with the regional organisations) to provide training for TLD operators.   However, the wording of "ICANN will also enhance collaboration with the global computer security and incident response community to improve BCP and testing to address risks and threats.  ICANN will seek to work with others to develop objective risk management models" again appears to pre-empt the work of the DSSA-WG.  We suggest that this could more appropriately read, "… will encourage collaboration with the global computer security and incident response community to improve…" and "… seek to promote work in the community to develop…"


**Core operations including IANA**

We are pleased to see that, in line with my earlier comments, staff retention and engagement now features as a fundamental component of improving efficiency and effectiveness of operations. However, we would note that this needs to be across the organisation, and not simply in the operational elements of ICANN's work:  this organisational continuity will be particularly important over the life of this strategic plan.

With the growth of IDN ccTLDs, and potentially of IDN gTLDs in the future, we recognise the need for ICANN to be able to work with partners across the globe.  However, we question whether this

really needs ICANN to establish a presence, a strategy that will be demanding on management resources and extremely costly. We would suggest that it would be more appropriate to say, "will continue to require ICANN to ensure an appropriate ability to work with the relevant partners."

On improving the financial system and controls, we welcome the dashboard and would recommend benchmarking some of the key measures to demonstrate delivery of these aims.

### Consumer choice, competition and innovation

We would underline that the stable evolution of the unique identifier system is fundamental to ICANN's role. Fostering industry innovation has to be seen in this context and should also be based on the public benefit that the Affirmation of Commitments puts at the heart of ICANN's role.

"Promote fair opportunities for open entry to internet-related markets around the globe" is too broad a statement for ICANN's limited technical role. A rather more realistic objective would be "to provide a domain name market that is able to underpin internet-related markets around the globe."

### A healthy internet eco-system

Generally, we welcome this section, which usefully focuses on listening to, and working with, the multi-stakeholder community and improving communications.

### Conclusions

We remain concerned about the delays in preparing this draft strategic plan and the short time available for comments. We believe that more time should be made available for input to the consultation.

More specifically, we believe that some improvement is needed in particular in the section on DNS Stability and Security, which is worded in a way that appears to predict a specific outcome from the community-led process.

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10 January 2011