中国互联网协会对 ICANN 社群问卷的答复意见

关于对互联网域名地址分配机构(ICANN)进行问责和透明度审查,我们认为,ICANN 在问责和透明度方面做了很大地努力和改进,如扩大决策过程中互联网社群的参与性、对政策文件开展公共评论、公开理事会会议记录等,我们认为正是 ICANN 采取一系列提高问责和透明度方面的措施和方法,才使得 ICANN 在互联网领域拥有今天的地位和发展成就。但随着互联网在经济社会中的作用越来越突出,确保一个安全、稳定和统一的全球互联网是各互联网社群的基本需要,我们注意到 ICANN 开展了问责和透明度审查,邀请社群提供评论意见,我们提议对以下几方面开展案例研究,改进 ICANN 的问责和透明度,提高各互联网社群参与 ICANN 相关工作的主动性、积极性。

一、语言同步

- (一)关于ICANN文件翻译。ICANN作为一个多利益攸关方的组织机构,应该对所有利益攸关方透明和负责,但遗憾的是,像新通用顶级域第四版申请人指南(DAG4)、年报等一些重要的政策文件,ICANN 很少提供中文及其他语言版本,这不利于中文互联网社群了解和参与ICANN,也不利于中文互联网社群为ICANN做出贡献。
- (二)关于 ICANN 会议语言。举例来说,在 ICANN 布鲁塞尔 大会上,所有会议发言主要使用英语,仅提供法语和西班牙语同传。

但作为全球使用人数最多的语言,在 ICANN 会议上没有中文同传。

(三)关于 ICANN 网站语言的翻译。我们看到 ICANN 正在努力,在其网站上提供多种语的翻译。但目前翻译仅限于很小的范围,没有覆盖到 ICANN 在网站上发布的所有文件和网页。鉴于中文互联网网民已经超过 4 亿,人数众多, ICANN 应在网站上提供中文内容和服务,让更多的中文互联网社群了解、参加 ICANN 活动。

二、IANA 合同

互联网是全球通用基础设施,ICANN负责管理IP地址、域名、协议参数等互联网资源,理应受到全球各国及所有利益攸关方的问责和监督。

然而,在IANA功能问题上,ICANN仅向一国提交报告的做法大大损害了ICANN的问责和透明度。IANA合同C 3.1 至C 3.3 中规定,ICANN仅向一国政府提交相关报告¹。IANA合同没有授权ICANN修改、添加、删除根区文件的权利,根系统的相关责任仍按"Amendment 11 of the Cooperative Agreement NCR-9218742"文件所列条款执行²。

在 IANA 合同的约束下,不能保证 ICANN 向其他国家政府和所

C.3.1 Monthly Performance Progress Report -- The Contractor shall prepare and submit to the Contracting Officer and COTR a performance progress report every month (no later than 15 calendar days following the end of each month) that contains statistical and narrative information on the performance of the IANA functions (i.e., assignment of technical protocol parameters; administrative functions associated with root zone management; and allocation of internet numbering resources) during the previous 30-day period.

¹ IANA 职能合同中的英文原文:

C.3.2 Audit Data -- The Contractor shall generate and retain security process audit record data for one year and provide an annual audit report to the Contracting Officer and the COTR. Specific audit record data will be provided to the Contracting Officer and COTR upon request. All root operations shall be included in the audit, and records on modifications to the root zone file shall be retained for a period of at least one year.

C.3.3 Final Report -- The Contractor shall prepare and submit a final report on the performance of the IANA functions that documents standard operating procedures, including a description of the techniques, methods, software, and tools employed in the performance of the IANA functions. This report shall be submitted to the Contracting Officer and the COTR no later than 30 days after expiration of the purchase order.

http://www.icann.org/en/nsi/coopagmt-amend11-07oct98.htm

有攸关方负责,也无法完全实现 ICANN 的问责和透明。因此,问责和透明度审查理应将 IANA 合同作为案例进行研究。

三、DNSSEC 部署

部署DNSSEC需要投入大量资金对DNS服务器进行升级改造,业界知名技术专家表示部署DNSSEC只能解决一部分安全问题³。ICANN在没有充分征求产业界和利益攸关方意见的情况下,做出了部署DNSSEC的决定,并确定了DNSSEC部署的时间表,这使ICANN丧失了公信力,其问责和透明度受到极大挑战。

DNSSEC 的信任机制由根区域(Root Zone)开始,自上而下通过父域(father zone)对子域(son zone)的逐级签名验证来实现,从而构成 DNSSEC 的信任链(Authentication Chain)。如果以根服务器(Root Name Server)为单一信任源,根服务器将成为所有域名服务器(name server)的信任锚(Trust Anchor)。则根区域(Root Zone)的密钥签名密钥(KSK: Key Signing Key)和区域签名密钥(ZSK: Zone Signing Key)在 DNSSEC 签名验证中将起到关键的作用。所以根区域的 KSK 和 ZSK 的生成、管理、变更、分发等流程的管理制度是否可问责和透明(Accountability and Transparency)至关重要。

³ ICANN DNESSEC 部署计划联合主席 STEVE CROCKER 在 ICANN 第 38 次大会上的发言: "there's two very broad classes of threats. One is that the information is going to be modified or corrupted. And the other is that the systems are going to be made unavailable by denial of service attacks. So if you take those two pairs and, you know, all the combinations, DNSSEC closes big holes in one-quarter of that space, that is, it protects the information during the lookup side. It does not do anything to protect the information about being put in. If incorrect information is put into the system or is modified at registration, then you're in trouble. And in either case, if the registration side or the lookup side is attacked from a denial of service attack or taken down in some other way, DNSSEC doesn't help at all."

互联网安全专家 DAN KAMINSKY 在 ICANN 第 38 次大会上的发言: Microsoft's New Zealand operations get hijacked; Comcast, one of the large ISPs in the United States, whose domain name get hijacked.

《DNSSEC Practice Statement for the Root Zone KSK operator》 ⁴ 和《DNSSEC Practice Statement for the Root Zone ZSK operator》 ⁵ 两份文件规定ICANN和VeriSign分别负责根区域的KSK和ZSK的生成、管理、变更和分发,然而同时还规定ICANN和VeriSign代表一国政府部门履行上述职能,并无条件执行其要求。在DNS系统已经成为全球互联网基础设施的今天,这极大影响了ICANN的可问责和透明度,因此有必要将DNSSEC的部署作为案例进行研究,找出ICANN在问责和透明度方面的不足,并加以改进。

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⁴ http://www.root-dnssec.org/wp-content/uploads/2010/06/icann-dps-00.txt

⁵ http://www.root-dnssec.org/wp-content/uploads/2010/06/vrsn-dps-00.txt