

Comment to ICANN re: [Continuous Data-Driven Analysis of Root Server System Stability Draft Report](#)

The Draft Report is inadequate and fails to assure the global internet community of the Root Zone security and stability, nor does the report definitively answer the essential questions:

"The study's primary research question is: Did the delegation of new gTLDs degrade the stability or security of the root DNS system? And based on the analysis carried out for this research question, our second research question is: Can we expect that the delegation of more new gTLDs will degrade the stability or security of the root DNS system in the future?" ("Draft Report" 27 Oct 2016, p.2).

The ONLY thing the authors of the Draft Report can definitely state is: **"We did not find any degradation of the stability or security of the root DNS system in this period that we could attribute to the new gTLDs."** (Draft Report, p.2)

That finding is hardly reassuring given the admission the authors of the Draft Report make on p. 3: **"our conclusion is limited to the results of the analyses that we designed and executed and is confined by the imperfections of the available measurement data."**

In addition, both ICANN and the authors of the Draft Report have been careless and negligent in failing to acknowledge and address the substance of the comments of Daniel Karrenberg Chief Scientist RIPE NCC, (speaking individually, not on behalf of the RIPE NCC)

<https://forum.icann.org/lists/comments-cdar-study-plan-02dec15/msg00001.html> dated 26 Jan 2016, which stated in part:

**"Our main comment and advice to ICANN is: do not expect the study to predict the absence of instabilities in the DNS root name server system including absence of instabilities that may be wholly or partly caused by root zone expansion. ICANN therefore must make proper contingency plans for the unpredictable cases where root zone expansion causes or contributes to instabilities in the DNS root sever system."**

ICANN has a long history of being foolish, careless, incompetent, and grossly negligent, when it comes to coordination and management of the internet, including root zone, in adding new generic top-level domains (new gTLDs)--see *e.g.*, [News Review: ICANN Used 'Junk Science' Firm to Justify New gTLDs](#).

Having already made the worst mistake in its organizational history in the way it implemented the new gTLDs program, ICANN appears content to continue in its misguided ways until it wrecks the internet and/or domain name system, global public resources over which ICANN is not, and never has been, a good steward.

Respectfully submitted,

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22 December 2016