

## ISPCP Comments on the Continuous Data-Driven Analysis of Root Server System Stability Draft Report

### **ICANN Internet Service Provider and Connectivity Providers Constituency**

The Internet Service Provider and Connectivity Providers Constituency (ISPCP) welcomes the opportunity to comment on the Continuous Data-Driven Analysis of Root Server System Stability Draft Report, see <https://www.icann.org/public-comments/cdar-draft-2016-10-27-en>. The ISPCP has actively engaged in the discussions surrounding the Root Server System, its growth, and stability and integrity. These comments are in response to the study commissioned by ICANN to examine the impact of root zone scaling and the security and to affirm that the delegation of new gTLDs did not jeopardize the stability of the root DNS system.

The ISPCP is both reassured by the key findings of the study and are in agreement with the advice of the authors. Specifically:

- There is no evidence that the new gTLD program degraded the security and stability of the root system;
- The rate of delegation has been gradual and this has been a success;
- Any future program to introduce new TLDs should keep the rate of delegation measured and gradual; and,
- ICANN should initiate a program of continuous monitoring a set of risk parameters, most importantly the volume of queries and the amount of processing required of root servers

Given these results and recommendations, the ISPCP would add only this as our comments. The ISPCP:

- 1) Agrees with the suggestion that continuous monitoring should be done by ICANN – if feasible, the monitoring effort should be instantiated as an internal service in the CTO office rather than being done by a third party.
- 2) Recommends greater cooperation between root server operators, ICANN and the IETF to ensure that protocol changes to the DNS do not result in changes in the amount of processing needed by the root servers – in particular, we call on the newly formed Root Server Caucus to act as ICANN's informal liaison to the IETF on DNS protocol issues.
- 3) Recommends regular reporting in a public transparent manner.
- 4) Make raw data from the monitoring effort publicly available in keeping with the call for greater transparency in data sources at ICANN.

In summary, the ISPCP supports the Analysis, its findings, and its recommendations. The ISPCP is appreciative of the work put into this effort.

Submitted on behalf of the ISPCP Constituency