Country Code Names Supporting Organization

Comments on ICANN FY12 SSR Framework

June 2011

The ccNSO welcomes the opportunity to comment on ICANN's FY12 Security, Stability and Resiliency (SSR) Framework. In addition to this response, ccTLD managers and regional country-code organisations may also provide individual responses to ICANN's call for comments.

The ccNSO welcomes, and shares, ICANN's recognition of the importance of maintaining the stability, security and resilience of the Domain Name System, and offers these comments in the context of this shared responsibility. This document is based upon discussions among ccNSO members about the substance of the framework, as well as additional briefing from Patrick Jones, ICANN's Senior Manager of Continuity & Risk Management.

Consultation

As a preliminary point, the ccNSO notes that the SSR framework was posted on 2 May 2011 and comments are open until 7 June 2011. The ccNSO suggests that this may not be an optimal consultation timeframe for such a significant area of work, which is still in its relative infancy as an ICANN project. While the FY12 Framework builds upon previous SSR plans, there are still significant gaps and a deficit of detail in the information provided and, as discussed below, the level of stakeholder understanding and "buy-in" could be greatly improved through broader and more informed deliberation.

This is particularly important given that, as a whole, SSR initiatives account for 17% of ICANN's total budget, or $12million USD for FY12.

Context and preparation

There are many stakeholders, both within and outside of ICANN, that have devoted considerable time and resources to improving the security, stability and resilience of the Internet and ICANN must recognise these in order to avoid duplicating efforts or establishing competing programs.

In order to maintain their support and engagement, these stakeholders must have a clear understanding of the role ICANN proposes for itself in regards to SSR initiatives and be reassured that ICANN has undertaken appropriate preparations to translate the very broad direction provided by ICANN's Bylaws into specific work programs that have been appropriately prioritised, based upon clear evidence and analysis.

To this end, the ccNSO proposes that, taking its Bylaws and, to an appropriate extent, the undertakings in Clause 9.2 of the Affirmation of Commitments as a guide, ICANN undertake a detailed environmental scan to assess the current Internet security ecosystem. In making this proposal, the ccNSO notes efforts already underway in the DNS Security and Stability Analysis Working Group (DSSA WG) and Affirmation of Commitments Security, Stability and Resiliency of the DNS review team and encourages ICANN not to duplicate or conflict with this work.

Such an analysis will, in turn, allow ICANN to undertake appropriate strategic planning, including gap and impact analyses, identification of possible refinements to current working arrangements and the areas where ICANN's narrow remit appropriately positions it to facilitate these improvements.

ICANN should also develop and communicate a clear vision for its work, defining benchmarks, objectives, milestones and a mechanism for assessing success in SSR activities. It is particularly important that the communication demonstrates a clear evidential chain from environmental scan to gap analysis to strategic plans. This level of planning is critical to the development of more detailed, specific budget allocations.

The ccNSO notes that such a strategic approach is consistent with broader advice offered by the ccNSO Strategic and Operation Planning Working Group, as part of ICANN's Strategic Plan 2011-14 and FY2012 Operational Plan consultations.[1]

In the event that ICANN has already undertaken any of this work in the course of its SSR planning, evidentiary materials should be made available to stakeholders.

Definitional improvement

The ccNSO welcomes ICANN's attempt, in its draft FY12 SSR Framework, to clarify the areas of activity where it perceives itself to engage as an operator/regulator, a collaborator, a coordinator, or a facilitator. To an extent, this has been drawn out in pages 4 to 8 of Part B of the FY12 SSR briefing. The ccNSO believes, however, that it is critical to make these differentiations, as well as the budget implications of these differentiations, explicit for all SSR work.

The ccNSO also believes that ICANN could minimize stakeholder confusion and allay stakeholder concern by better defining a number of broad terms used in the SSR framework. For example, when referring to "DNS Operations", ICANN should clarify (a) what is encompassed by this term; (b) the role ICANN sees itself playing; and (c) where its operational responsibilities start and stop. If ICANN is specifically referring to L-root and internal staff IT operations then that should be made explicit.

Similarly, greater detail should be provided regarding the use of terms such as "capacity-building". If this refers to training and capability programs, this should be made explicit, as should ICANN's view on whether it expects to develop, promote and host its own training events, or whether it should simply raise awareness of existing initiatives. This is particularly important in the context of earlier observations in this document regarding complementing, not competing with, existing efforts in the security ecosystem.

Finally, a number of broad work programs referenced by the FY12 Framework, including "Whois Internationalised Registration Data", "IDN variant case studies" and "Technical evolution of Whois" could also benefit from both a clearer statement from ICANN regarding the nature of its involvement and the evidentiary material that demonstrates a direct relevance for these specific work programs to the SSR Framework.

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[1] http://ccnso.icann.org/workinggroups/sopwg-comments-stratplan-2011-2014-21feb11-en.pdf
http://ccnso.icann.org/workinggrousp/sop-comments-fy12-ops-plan-framework-30mar11-en.pdf

<u>Budget detail</u>

As mentioned above, a more thorough strategic approach to ICANN's SSR work will deliver greater clarity regarding how and why ICANN will allocate its $12 million SSR budget and the results it expects to achieve in return for this investment.

However, more specifically, the FY12 SSR framework references a number of cross-organisational initiatives (such as support for the IDN program), or existing projects supported by other departments within ICANN (such as the community-driven DSSA WG). The ccNSO would welcome clarification from ICANN as to whether, and the extent to which, the SSR budget will be devoted to supporting these projects.

The ccNSO appreciates the opportunity to comment on ICANN's FY12 Security, Stability and Resiliency (SSR) Framework. These comments are offered in the context of our shared responsibility of maintaining the stability, security and resilience of the Domain Name System. Please do not hesitate to let me know if you would like further clarification from the ccNSO on any of the points raised in this submission.

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