

LACRALO Statement for Security, Stability & Resiliency of the DNS Review Team (SSR RT) - Draft Report

First, we want to congratulate the Security, Stability and Resilience Review Team for their enormous effort and we want to give a special acknowledgement to the RT Chair, Alejandro Pisanty, a member of our region. We would like to make special emphasis on the ordered and subject-specific presentation that provided for an issue with a high level of complexity to be easily understood by community, by being presented in a logical, structured, and concatenated manner regarding each one of the recommendations.

We support all of recommendations that were made, and although there is not very much to add, we would like to state some comments in particular.

Starting point – since the word “Resiliencia” (resiliency) exists in Spanish, the Spanish version shall use such word instead of “Flexibilidad” (flexibility) that has no complete meaning of resiliency.

Though generally speaking broad participation is a goal to pursue, when the focus is on Security and Stability we need to be more conservative in such approach. We tend to agree with the registries in this regard, where they believe: “Too broad an engagement on some SSR matters might create SSR risks”. ICANN’s relationship with SSAC is quite different from the one it has with RSSAC, so more clarity in this recommendation should be considered.

We believe it is important the RT started addressing the ICANN's technical limited mission. We believe it is necessary to develop a single document, with a clear terminology, where the definition and scope of SSR can be established, as one of the main objectives within the framework on the SSR Plan for FY12, incorporating the statement of responsibility for SSR as it was proposed by the RT. At the same time, we agree that the relationships between ICANN and other groups should be clear, as well as the relationships among RSSAC and SSAC, so in consequence, we support recommendations 1 to 6, since the only way for procedures to be transparent and contributions be properly issued, is by providing a clear definition on the nature of relationships, as the Recommendation 3 has expressed.

Thus, ICANN will reach for a greater number of stakeholders within the Internet Ecosystem. We specially, as members of a regional organization of Internet users, suggest having particular regard to those who do not participate in ICANN. We agree on the need to have a defined plan as soon as possible in terms of SSR linkage to other communities within and outside of ICANN and the development of an efficient feedback mechanism on SSR work. We share the statement on posting information about DNS threats and mitigation strategies for them.

It would be important to publicize the effectiveness of the current security plan that ICANN has established to face potential or actual challenges and threats; and what are the short-and long-term objectives to meet future challenges and threats to Security, Stability and Resilience of DNS, consistent with the limited technical mission of ICANN, and to control the power to maintain stability of DNS with the due limits that this entails.

We stress the need for ICANN Strategic Plan to reflect the commitment to its goal and mission stated as to "preserve and enhance the operational stability, reliability, security and global interoperability of the Internet".

It is also important that the SSR-RT does not focus exclusively on "physical" issues given that, as we know, there are other threats that can affect the stability and security of DNS. This should be framed in a process of continuous improvement, not only on subjects related to SSR but with the entire organization.

We agree with Ayesha Hassan's comment when she says that the RT could examine how best practices would be included in contracts as referred to in Recommendation 12.

We stress Recommendation 23 regarding the need to provide Working Groups and Advisory Committees, of resources and certain freedoms in order to develop high quality conclusions. Because of this, the RT should plan how they believe that ICANN can guarantee this way of working.

We agree with Mikey O'Connor's public comment regarding the need to sharpen the meaning of "risk management framework" in the document, and with ALAC's comment about the need for ICANN to accelerate the creation and publication of a formal and comprehensive framework for risk management of the DNS. It is important that the goal of focusing on long-term risks does not imply paying less attention to short-term risks.

The framework design should be done in layers and from a multiple perspective to measure and manage the DNS level. This framework should support risk analysis, the likelihood and impact of changes in the DNS infrastructure as well as the changes in policy making.

And we support Recommendation 28 for the purpose of ICANN to continue its engagement in the planning and prevention of incidents, providing outreach and education, involving all areas concerned to preserve the multi-stakeholder model, including bottom-up processes and also allowing the participation of specialized Internet end-users.

The report refers to the absence of a comprehensive framework for risk management of the DNS. So we must think about how this formal framework ought to be created with the involvement of the SSAC, DSSA, Board DNS Risk Management Working Group, CSO and with the participation of specialized stakeholders.

We note that the risk assessment to protect DNS infrastructure is critical and so our point of view is that this work is the initial point for future work not only of SSRT but other constituencies, and that security, DNS stability and strength concerns us all and we must all

work to reduce the risks, both within and outside ICANN. And this means transparency (Recommendation 20 and 26) on the results of the plans put in place to assess whether they are paying off or not (recommendation 28), and so make the necessary modifications.

LACRALO.

Jose F. Arce
LACRALO Chair

Dev Anand Teelucksingh
LACRALO Secretariat