![SSAC — ICANN Security and Stability Advisory Committee logo]

28 February 2023

Subject: SSAC2023-03: SSAC Response to SAC059 Initial Assessment and Feasibility
             Study

To: Tripti Sinha, Chair, ICANN Board of Directors

Cc: John Crain, Senior Vice President & Chief Technology Officer, ICANN

Dear Tripti,

On 11 November 2020, ICANN org sent the SSAC an initial assessment and feasibility study for
implementing the outstanding recommendations in SAC059: SSAC Letter to the ICANN Board
Regarding Interdisciplinary Studies. The SSAC has reviewed these documents and at this time
the SSAC does not plan to complete further analyses in order to provide guidance to ICANN org
on the implementation of SAC059 as the recommendations are largely overcome by events. The
SSAC would not oppose closing out Recommendations 1-2. Rather, the SSAC will charter a new
work party in the future to study issues related to expanding the namespace and to identify
information gaps that may be necessary to address in order to effectively evaluate operational
security, stability, and resiliency (SSR) risks to the DNS.

The SSAC published SAC059 in 2013. SAC059 provided ICANN with some examples of what
"interdisciplinary studies" ICANN should consider for the security and stability implications of
expanding the root zone more than an order of magnitude. The SSAC first recommended such
interdisciplinary studies in 2010 in SAC046: Report of the Security and Stability Advisory on
Root Scaling:

> *SAC046 Recommendation (5): ICANN should commission and incent interdisciplinary
> studies of security and stability implications from expanding the root zone more than an
> order of magnitude, particularly for enterprises and other user communities who may
> implement strong assumptions about the number of TLDs or use local TLDs that may
> conflict with future allocations.*

In response to SAC046, the ICANN Board requested[1] advice from the SSAC on how
interdisciplinary studies of security and stability implications from expanding the root zone more
than an order of magnitude should be carried out and whom else should be consulted, and tasked
ICANN org staff with formulating and executing one or more studies, as needed. In SAC059, the

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[1] See ICANN Board Resolutions 2012.09.13.05 – 2012.09.13.06, Response to SSAC Letter of 2 July 2012,
https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-of-directors-13-09-2012-en#1.c

SSAC suggested that the areas of inquiry include technical concerns (protocol issues, namespace issues, DNSSEC issues), and non-technical concerns (economic issues, business issues, end user issues, and law enforcement/internet crime issues). In October 2016, the ICANN Board introduced the Board Advice Register and categorized SAC059 as "Open - In Implementation," with the note that "issues related to the expansion of the root zone have been/are being considered through other means, including Name Collision and DNSSEC roll over…ICANN continues to work to address the issues identified in SAC059."[2]

After receiving the initial assessment and feasibility study in November 2020, the SSAC has been discussing the remaining status of SAC059. While the SSAC believes there may still be some knowledge gaps in reviewing the impacts of expanding the root zone, the SSAC does not believe it makes sense to pursue the original studies as recommended in 2013 under the original goals for the publication of SAC059. Instead, the SSAC will continue monitoring ICANN's planning for additional TLDs and may provide recommendations in the future as we examine related issues. In more detail, the SSAC has determined the following reasons that SAC059 may be closed out at this time:

1) Technical questions raised in SAC059 have been largely addressed in the implementation of other SSAC recommendations as well as other projects across ICANN since 2013.

2) Remaining questions related to business, economics, and end user rights have been recently addressed by the Competition, Consumer Trust, and Consumer Choice (CCT) Review and its comprehensive set of recommendations. As mentioned in SAC114, "the SSAC's concern aligns with concerns raised in CCT Final Report and its challenges with being able to adequately assess 'the extent to which the expansion of gTLDs promoted consumer trust and the effectiveness of safeguards adopted by new TLD operators in mitigating certain risks involved in such expansion.'" At this time, the SSAC believes that implementing the CCT recommendations will be more beneficial to the ICANN community than focusing on the SAC059 recommendations.

3) Rather than have our comments and recommendations in this space bound by responses to particular questions or specific public comments and tied to the distant past, the SSAC will take the opportunity to start with a "clean slate" and articulate the areas where we believe that more data, measurement, and analysis is necessary to make well-informed, risk-balanced decisions and policies around adding gTLDs.

4) The SSAC has already identified several topics for future work parties that may provide updated recommendations for the Board to consider. These include examining the SSR risks from expanding the namespace and assessing available SSR data that ICANN and other professional groups track and analyze.

While the SSAC believes that closing out SAC059 Recommendations 1-2 is the prudent choice at this time, there is some disappointment that the recommendations stalled in the

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[2] See ICANN Board Advice Register and Status of SSAC's Historical Advice to the ICANN Board, 19 October 2016, https://www.icann.org/en/system/files/correspondence/crocker-to-faltstrom-19oct16-en.pdf

implementation phase without any updates and the overall process lasted many years, eventually largely being overcome by events. The SSAC is aware of an ongoing initiative from ICANN org to improve the overall advice consideration process. The SSAC is looking forward to being an active participant in this process to improve the communication around advice consideration and implementation moving forward.

Thank you for your consideration of SAC059 and to ICANN org for developing the initial assessment and framework for us to review. At this time, the SSAC will not object to ICANN org closing out SAC059 in the Action Request Register per its normal processes.

Rod Rasmussen

Chair, ICANN Security and Stability Advisory Committee