



VERISIGN™

May 30, 2013

Via Federal Express and Email

Vernita D. Harris
Senior Telecommunications Policy Specialist
National Telecommunications & Information Administration
United States Department of Commerce
1401 Constitution Ave., N.W., Room 4701
Washington, D.C. 20230

Re: Joint Test Summary Report, RZM 2.0

Dear Vernita:

Over the past several months, Verisign has worked collaboratively with ICANN to provide an iterative and functional improvement to the root zone system. This functional improvement supports the receipt of new TLD delegation requests by ICANN and processes the requests in an automated fashion. The completion of this effort functionally resolves the “add TLD” process concern outlined in section III-B of Verisign’s New gTLD Security and Stability Considerations technical report¹ issued on March 28, 2013. The ability to process new delegation requests in an automated fashion will allow the root zone team to process a greater number of new TLDs that are anticipated to be issued in association with the New gTLD program with less risk in the provisioning process. You have received a joint letter from ICANN and Verisign dated May 16, 2013, acknowledging this success and milestone.

There are several significant issues, however, that are not addressed in the May 16, 2013 letter to NTIA that we need to clearly communicate to you. We have discussed these issues with ICANN but ICANN declined to include these points in our joint letter to you dated May 16, 2013. These are important points on which it is critical that there be no misunderstanding as we strongly believe certain issues have not been addressed and must be addressed before any root zone managers, including Verisign, are ready to implement the new gTLD Program. We want to clearly be on record as reporting out this critical information to NTIA unequivocally as we believe a complete assessment of the critical issues remain unaddressed which left unremediated could jeopardize the security and stability of the DNS.

¹ <http://www.verisigninc.com/assets/gtld-ssr-v2.1-final.pdf>

Specifically, while the ability to provision a greater number of new delegations is significant progress for the root zone provisioning system and addresses one of the points of concern within our referenced security and stability report, the delegation of names in the root has far broader implications than simply updating the root zone file itself. In the current operational model the root server system is operated by 12 different organizations with responsibility for receiving updates of the root zone file from the distribution masters and resolving queries for the server(s) that they are chartered to operate. It is critical to emphasize that holistic root server system monitoring, system performance, and early warning capabilities have not been developed for the root server system in preparation for the anticipated influx of new gTLDs into the system.

Accordingly, we strongly recommend that the previous advice related to this topic be implemented and the capability for root server system monitoring, instrumentation, and management capabilities be developed and operationalized prior to beginning delegations. Furthermore, we share in the concerns of the root scaling study team and SSAC and urge establishment of an early warning capability based on this information that ensures adverse effects from these changes can be detected and mitigated in a timely manner. Finally, we recommend that an explicit policy and operational framework be put in place to codify the deliberate implementation of such a system, where changes that trigger instability and require halting of or rollback of delegations within the root in order to stabilize the DNS ecosystem, or dependent systems outside of the DNS itself, be well in place and well understood before delegations begin. We stand ready to assist in developing that policy with ICANN and with your leadership and guidance.

As the Root Zone Maintainer and an operator of 2 of the 13 root servers with experience in managing large system loads, Verisign remains concerned about these points such that the stability of the root server system can be preserved for the dependent Internet community.

Sincerely,



Patrick S. Kane
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