



The Internet Corporation for Assigned Names and Numbers

(Via email and post)

May 28, 2009

Ms Anna Gomez
Deputy Assistant Secretary
For Communications and Information
National Telecommunications and
Information Administration
1401 Constitution Ave NW
Washington, DC, 20230

Dear Deputy Assistant Secretary Gomez,

I am writing to you following an ICANN Board Workshop held 15-16 May in Vienna, Austria where the Board considered inter alia, recent discussions between Department of Commerce (DoC) staff and staff of ICANN concerning the pressing need to sign the root zone. The following is the ICANN Board's response to the DoC's proposed process to sign the root zone.

1. ICANN's Interest and Expertise in Signing the Root Zone

1.1 ICANN has been working towards a signed root for more than three years. In fact, ICANN has operated a root zone signing test bed for more than two years, and signed the IDN test top-level domains in 2008. Accordingly, ICANN recognizes the urgency and imperatives around signing the root to enhance stability and security, through the use of DNSSEC.

2. ICANN Will Work With NTIA and VeriSign Towards an Operationally Signed Root Zone as soon as is feasible in 2009

2.1 ICANN will work with NTIA and VeriSign ("the Parties") recognizing that the NTIA has established clear parameters, and that a root zone signing process involves the contracts ICANN and VeriSign have with DoC.

2.2 ICANN will work to avoid delays, and, accordingly, will work with the Parties to first test, and then have a production deployment of a signed root zone ("the Goal") without prejudice to any proposals ICANN may make for long term signing processes in due course.

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3. Any Agreed Signing Process Will be Interim

3.1 ICANN understands that the first process developed between the Parties will be interim and require reassessment at a date to be decided by the Parties. This has also been made clear to ICANN staff by DoC staff in discussions. ICANN's participation is on that basis and without entrenching any rights and responsibilities arising from the interim process.

4. Consultation is Core to the ICANN Model

4.1 ICANN will participate with the Parties on the Goal without a further prior consultative process. However, consultation is core to ICANN processes and entrenched in its constitutive documents. Therefore ICANN believes that some details will benefit from consultation with the broader technical community to deliver a safe and stable way to reach the Goal.

5. Management of Key Signing Key (KSK) and Zone Signing Key (ZSK)

5.1 ICANN understands that the Department of Commerce has decided that VeriSign should manage and have operational responsibility for the ZSK in the interim arrangement, and that ICANN and VeriSign should work together on KSK management.

5.2 In these circumstances ICANN believes that the preferred architectural approach is one where ICANN manages the KSK process and advises the Department. This approach is also the most likely to gain community support. ICANN will work with VeriSign regarding operational and cryptographic issues.

6. ICANN to Make Resources Available to Support the Goal

6.1 ICANN will make its technical, legal and policy resources available to assist in achieving the Goal.

7. Conclusion

7.1 It is very important that DNSSEC be deployed at the root level for the benefit of the global community of Internet users. The ICANN Board looks forward to working with the Parties in pursuit of our collective interest in the Goal.

Yours sincerely

Peter Dengate Thrush
Chairman
Board of Directors
ICANN