Dear Rod,

I am writing to convey the ccNSO Council and members’ concerns regarding your comments made to the joint meeting of the ICANN Board and Governmental Advisory Committee (GAC) on Tuesday, 9 March 2010.

Your inflammatory comments to governmental representatives regarding - in your view - the precarious state of the security of the DNS, have the potential to undermine the effective and productive relationships established under ICANN’s multi-stakeholder model. Your alarming statement to the GAC infers that current security efforts are failing. This could cause great concern among governments regarding how elements of critical internet resources are operated and managed in their countries.

In particular, your remarks have the potential to damage the effective relationships that many ccTLD operators have developed with their national administrations. In the circumstances, it is difficult to comprehend why, despite a brief discussion on your DNSCert proposal, the full details of your security-related concerns were not raised during your meeting with the ccNSO earlier this week.

The ccNSO Council is also concerned about your intention to write to governments about their DNS asking whether or not such DNS is able to withstand the perceived new levels of attacks. This has the potential of compromising the manner in which ccTLD managers in those countries operate. It also has the potential to undermine ccTLD managers’ ongoing efforts to make their DNS more robust and resilient against attacks. We urge that if such measure is to be taken, it first be dealt with through the ccNSO.

Further, your comments discount the huge efforts of many in the ICANN community to ensure the ongoing security and stability of the DNS, including the Root Server System Advisory Committee, Security and Stability Advisory Committee, and the ccNSO. It diminishes the efforts of those that collaborate with ICANN, such as the IETF and the CERT community. In addition, a number of the top 20 registries in the ccNSO state that you have not spoken with them on this topic. At a broader level, your statement has the potential to strengthen the positions of those that criticise ICANN and who would prefer to see changes to how Internet numbering and naming resources are managed.

The ccNSO Council would like to reiterate that security remains a core strategic and operational priority for the ccTLD community and we remain strongly committed to working with ICANN, other Internet stakeholders and governments to ensure the stable and secure operation of the DNS. Our concerns lie not with your focus on security issues, but with your precipitated unilateral analysis of such an important issue and the public and inflammatory manner by which your views have been communicated.

We agree that, as CEO of ICANN, it is your responsibility to address these issues, but it is equally your responsibility to do so through ICANN’s bottom-up, consensus-based multi-stakeholder model. It is also the responsibility of those in positions of influence within
ICANN to show due care when making statements on complex, cross-cutting issues to ensure effective analysis and stakeholder engagement without unnecessary confusion or concern.

Regarding the issue at hand, we suggest that ICANN work with all relevant internal and external stakeholders to develop a clear analysis of the current mechanisms in place to ensure the ongoing security of the DNS. As a first step, we urge you to share with us and other stakeholders the underlying facts or studies that originally led you to make your statements.

Only after analysing the entire security landscape, with the buy-in of all stakeholders, can ICANN develop a clear strategy and operating plan for improvement. The ccNSO stands ready to contribute to this process.

Yours sincerely,

Chris Disspain
Chair – ccNSO Council