

# Staff Report of Public Comment Proceeding Template (v4.0)

## **Overview:**

*This template is being provided to assist staff in the preparation of a report that summarizes and, where appropriate, analyzes public comments. Please save the document in either \*.doc/\*.docx and submit to: [public-comment@icann.org](mailto:public-comment@icann.org).*

## **Instructions:**

- **Title:** Please enter the exact title that was used in the original Announcement.
- **Comment Period:** Enter the original Open, Close, and Staff Report Due Dates. (*Format: Day Month Year, e.g., 15 June 2016*). Please note if any extensions were approved.
- **Prepared By:** This field will accommodate a situation where an individual or group other than the principal staff contact, e.g., a Working Group, develops a report.
- **Important Information Links:** Do not enter any information in this section; the Public Comment Team will provide the appropriate links.
- **Section I: General Overview and Next Steps:** Please use this area to provide any general summary or highlights of the comments and indicate the next steps following publication of the report.
- **Section II: Contributors:** Please use the tables provided to identify those organizations/groups and individuals who provided comments. It is not necessary to identify “spammers” or other commenters who posted off-topic or irrelevant submissions. In addition, if there is a large number of submissions, it is acceptable to characterize the respondent communities rather than attempt to list them individually in tables.
- **Section III: Summary of Comments:** This section should provide an accurate, representative, and thorough review of the comments provided. As the disclaimer explains, this is a summary only of those contributions that the author determines to be appropriate to the topic’s purpose. Authors are cautioned to be conscious of bias and avoid characterizing or assessing the submitted public comments. If an analysis of the comments is intended, please use Section IV below.
- **Section IV: Analysis of Comments:** Please use this section for any assessments, evaluations, and judgments of the comments submitted and provide sufficient rationale for any positions that are advocated. If an analysis will not be undertaken or, if one will be published subsequently, please add a note to that effect in this section.

*Note: You may also utilize, for this section, the Public Comment Issue Tracking Checklist template, which is available at: <https://community.icann.org/x/d67hAq>.*

# Staff Report of Public Comment Proceeding

## Identifier Technology Health Indicators: Definition

**Publication Date:** 16 February 2017

**Prepared By:** Alain Durand

### Public Comment Proceeding

Open Date: 29 November 2016

Close Date: 23 January 2017

Staff Report Due Date: 15 February 2017

### Important Information Links

[Announcement](#)

[Public Comment Proceeding](#)

[View Comments Submitted](#)

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## Section I: General Overview and Next Steps

ICANN solicited feedback from the community on the description of five diseases that could affect the health of the name part of the system of unique Internet identifiers.

ICANN presented these five diseases at ICANN57.

**Next Steps:** The Identifier Technology Health Indicators (ITHI) initiative will move on to define actual metrics to measure those diseases.

## Section II: Contributors

*At the time this report was prepared, a total of twelve (12) community submissions had been posted to the forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.*

### Organizations and Groups:

Name	Submitted by	Initials
IAB	Andrew Sullivan	IAB
ISPCP	Mark McFadden	ISPCP
ALAC	Staff	ALAC
RySG	unknown	RySG
NCSG	Tapani Tarvainen	NCSG
SSAC	SSAC091	SSAC
IPC	Greg Shatan	IPC
BC	Steve DelBianco	BC

### Individuals:

Name	Affiliation (if provided)	Initials
Jaap Akkerhuis		JA
John Berryhill		JB

James Gannon		JG
Steve Crocker		SC

### Section III: Summary of Comments

*General Disclaimer: This section intends to summarize broadly and comprehensively the comments submitted to this public comment proceeding but does not address every specific position stated by each contributor. The preparer recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).*

Seven comments expressed interest and/or support for the overall idea of measuring and tracking, over a period of time, the health of the internet: “Talking about “the health of a system” might be reasonable” [JA], “A research program such as the ITHI effort may provide interesting and useful information to the world about the global DNS.” [IAB], “The ISPCP supports the efforts to create a coherent and appropriate set of terminology and identify a terminology for health indicators when discussing problems, weaknesses, or concerns about the domain name system.” [ISPCP], “We fully support the basic approach rooted in SAC077, as applied to the ITHI.” [ALAC], “The SSAC is deeply interested in this topic.” [SSAC], “I very much like the idea of listing several issues related to the domain name system and tracking them over time” [SC], “The IPC applauds ICANN for analyzing DNS health issues before defining metrics to measure this important issue.” [ISPCP], “it is the hope of the BC that ICANN can move quickly on the ITHI” [BC]. Among those, one comment, although supportive of the idea of tracking health issues, is skeptical of the notion of measuring them: “Attempts to put metrics on the health [...] doesn’t work very well for some of the issues.” [SC]. Three comments are overall negative: “this initiative while in good nature holds major risks of dirtying the ecosystem and taxonomy of security and stability of the parts of the internet identifiers under ICANNs remit.” [JG], “we believe that the proposal introduces more issues than it solves. ICANN and community effort would be better spent by addressing feedback made on the gTLD Marketplace Health Index than continuing this work on a separate track.” [RySG], “

Eight comments found the use of latin names to describe that taxonomy of “diseases” unhelpful: “ I personally find the “health science” terminology (Datamalgia, Abusitis, Magnitudalgia, Perfluism, Datafallaxopathy) rather artificial and can take the slides mentioned as the relevant resources hardly seriously.” [JA], “Adopting a sophomoric and untranslatable faux medical nomenclature to define areas of study is unhelpful” [JB], “The ALAC would thus recommend simplifying and “de-Latinizing” the document.” [ALAC], “we believe that the use of lengthy and obscure Latin names to refer to potential issues is confusing and does not contribute to improving ecosystem health.” [RySG], “assigning silly, strange and distorted names to issues that need careful and balanced review, consideration and evaluation is, as you have been told in other comments, DANGEROUS” [NCSG], “The Latin and Greek nomenclature used for these five areas are sometimes evocative, but are probably confusing to many readers.” [SSAC], “The IPC cautions against the concept of creating more coined terms, as such newly created words may be a barrier to participation and comprehension particularly for non-English speakers.” [IPC], “It is the recommendation of the BC that the labels be simpler and more straightforward.” [BC]. One comment was supportive of the Latin names: “The ISPCP membership recognizes the need to create a terminology to identify the metrics used to discuss the state of the Domain Name System (DNS.) Further, the use of a medical metaphor based on health, and its associated foundation in the Latin language for medical treatment and disease identification could enable a coordinated creation of such terms, both immediately and in the future.” [ISPCP]

There were several comments about scope of the project: “The IAB does see a risk that the broad scope of the project might be misinterpreted as an assertion by ICANN of a broad policy remit.” [IAB], “Even recognizing that the RIR number community should be rightly able to define its own terminology for the health and problems of the IP addressing and other Internet number spaces, there needs to be

coordination between the work that goes on inside of ICANN and the work that goes on in the RIRs” [ISPCP]. “The initiative to define and measure indicators of the technological health of all ICANN-coordinated identifiers (Identifier Technology Health Indicators - ITHI) should not be confused with the other current “health” project that focuses on the condition of the gTLD marketplace.” [ALAC], “The RySG wants to flag that some of the issues addressed by the ITHI are outside ICANN’s remit” “Further, it appears that other comments received on the gTLD Marketplace Health Index were similarly improperly considered.” [RySG], “The SSAC notes that the ITHI is different from the generic Top Level Domain (gTLD) Marketplace Health Index Proposal” [SSAC], “One of the five strategic [plan] objectives is to support a healthy, stable, and resilient unique identifier ecosystem consistent with Section 1.1(a) of the ICANN Bylaws.” [IPC]

#### **Section IV: Analysis of Comments**

*General Disclaimer: This section intends to provide an analysis and evaluation of the comments submitted along with explanations regarding the basis for any recommendations provided within the analysis.*

Twelve comments were received and most were supportive of the overall initiative. However, several expressed concerns over the proposed use of Latin-like medical-based terminology to identify Internet health conditions. Since this feedback was so clear, ICANN is dropping the Latin terminology as the project goes forward.

Some comments appear to have confused this initiative with the GDD marketplace index. Those two projects are addressing different problems. The marketplace index is looking at business metrics, the ITHI initiative is looking at technical metrics.

As noted by several comments, this initiative is framed within the ICANN 2016-2020 strategic plan that has been grand-fathered with the bylaws.

The RIR community has started their own evaluation of ITHI metrics. It is expected that this branch of the project will be merged with the overall ITHI initiative at a later point in time.

ICANN recognize that not all health issues can be put into metrics, and that there exist more issues than the one listed in the ITHI definition of health.