

Staff Report of Public Comment Proceeding

| Recommendations for Early Warning for Root Zone Scaling | | | |
|--|-------------------------|------------------------------------|------------------------|
| Publication Date: | 4 December 2020 | | |
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| Section I: General Overview and Next Steps | | | |
| <p>The comments in general supported the idea to set up an early warning system for issues that might appear if the root zone scales too quickly. The additional comments received from the community will help ICANN org prepare a second version of the document with greater detail in particular areas. Further, the Security and Stability Advisory Committee (SSAC) will continue independent work in the general topic area, which might later lead to further revisions of the document.</p> | | | |
| Section II: Contributors | | | |
| <p><i>At the time this report was prepared, a total of 7 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.</i></p> | | | |
| <u>Organizations and Groups:</u> | | | |
| Name | Submitted by | Initials | |
| Non-Commercial Stakeholders Group | Tomslin Samme-Nlar | NCSG | |
| gTLD Registries Stakeholder Group | Elizabeth Bacon | RySG | |
| ARTICLE 19 | Ephraim Percy Kenyanito | Art19 | |
| At-Large Advisory Committee | ICANN At-Large Staff | ALAC | |
| Root Server System Advisory Committee | Ozan Sahin | RSSAC | |
| Security and Stability Advisory Committee | Rod Rasmussen | SSAC | |
| Business Constituency | Steve DelBianco | BC | |
| Section III: Summary of Comments | | | |
| <p><i>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).</i></p> | | | |

The comments in general supported the idea to set up an early warning system for issues that might appear if the root zone scales too quickly.

NCSG points out that one of the factors listed in the document, IANA being unable to keep up with the normal changes to the root zone, could be due to factors other than root zone scaling. They propose establishing a “baseline of the IANA team size developed based on statistical data that outlines the relationship between the team size and the root zone size.”

RySG notes that entities’ concerns about root zone scaling are probably subjective, and proposes that reviewing and documenting the methodology use when those concerns are raised. They further recommend that ICANN consider documenting timelines that would be needed to address delays in updating the root zone if scaling becomes an issue.

Art19 says that the recommendations “propose data collection for monitoring but do not provide clear guidance on the scope and limitations.” It notes the same issue as the NCSG does about IANA staffing. It also recommends that data that is collected for the early warning system be collected, used, stored, and destroyed in accordance with the right of privacy.

ALAC notes that early warning from the anti-abuse communities be taken seriously, that consultation with the larger community be taken if scaling concerns arise, and that additions to the root zone be paused if scaling issues cause a significant impact.

RSSAC asks that the focus of the document change from scaling issues affecting individual root server operators (RSOs) to affecting the root server system (RSS) as a whole. The RSSAC Caucus is beginning to consider what “a failure of the RSS might look like and investigating ways to detect such failure.” RSSAC proposes that “no significant change be made to the root zone that cannot be backed out on short notice” and that “changes be made at a rational rate with the added ability to suspend the rollout if needed,” as advised in RSSAC022. It also reiterated advice about the root zone itself from RSSAC031.

SSAC is “forming a work party to fully consider OCTO-15 and related issues” and hopes to report back later on progress.

BC is concerned with root zone expansion but does not directly address detecting or dealing with scaling issues on the RSS.

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.

ICANN org will publish an updated version of the document, based on the community comments listed in Section III. While not all the comments can be addressed, the document will reflect the range of comments, and the action plan that will come from the revised document’s publication will better represent the community’s desires for the early warning system.

NCSG's and Art19's proposal for a baseline of IANA's team size relative to the root zone size is not included in the revisions because the early warning system is for determining if the scaling of the root zone, not the size of the root zone, is deemed excessive. False alarms from IANA can be avoided as IANA reports into the early warning system. Instead, the revised document will be reworded to avoid false positives based on IANA staffing.

Art19's recommendation of data collection, use, storage, and destruction will be added to the updated document.

RSSAC's request to focus on the RSS as a whole instead of the first RSOs that are affected by root zone scaling would delay the reporting of scaling issues. It will be mentioned in the revised document, but the document will continue to focus on problems seen in individual RSOs as potential early warnings of scaling issues. The relevant information from RSSAC023 and RSSAC031 will be added to the revised document.

The document might be revised again after SSAC's work party reports on its work. In the meantime, it would be useful for SSAC and RSSAC to cooperate on the work that SSAC is proposing so that the later revision can include cohesive recommendations from the two groups.