



20 January 2017

Subject: SAC091: SSAC Comment on Identifier Technology Health Indicators

The SSAC has reviewed the presentation on Identifier Technology Health Indicators (ITHI)<sup>1</sup> and provides this response to the Call for Public Comments on “the description of five diseases that could affect the health of the name part of the system of unique Internet identifiers.”<sup>2</sup>

The SSAC notes that the ITHI is different from the generic Top Level Domain (gTLD) Marketplace Health Index Proposal,<sup>3</sup> for which the SSAC provided public comments in SAC077.<sup>4</sup> The ITHI draft notes that it is taking some advice from SAC077, namely first to define health, second to define metrics to measure health, and third to get data to measure those metrics.<sup>5</sup> The ITHI presentation notes that it is an attempt to accomplish only the first step (define health), with the other steps to follow after an opportunity for public comment.

The ITHI was presented as a slide deck. The SSAC finds it difficult to evaluate a slide deck, which contains abbreviated material and therefore requires interpretation. Eventually the SSAC hopes to be able to evaluate a document specifying various Key Performance Indicators (KPIs) and how they can be measured.

The ITHI presentation lists five areas of health. Within each there are lists of real-life problems, which are useful to start a discussion of the problems that affect the domain name system (DNS). The five areas are metaphors that are sometimes stretched -- they are umbrellas that sometimes encompass diverse or only loosely associated phenomena. SSAC notes that they may not cover a comprehensive list of metrics that are essential for measuring the health of the DNS.

The Latin and Greek nomenclature used for these five areas are sometimes evocative, but are probably confusing to many readers. We suggest that the novel terms be dropped, and that when possible the authors use terms that already exist. For example, “datamalgia” is mainly about *invalid WHOIS data*, and “perfluism” is mainly about *name collisions*.

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<sup>1</sup> See: <https://www.icann.org/en/system/files/files/ithi-dns-health-free-from-diseases-29nov16-en.pdf>.

<sup>2</sup> See: <https://www.icann.org/public-comments/ithi-definition-2016-11-29-en>.

<sup>3</sup> See: <https://www.icann.org/public-comments/gtld-marketplace-health-2015-11-17-en>.

<sup>4</sup> See: <https://www.icann.org/en/system/files/files/sac-077-en.pdf>.

<sup>5</sup> See: <https://www.icann.org/en/system/files/files/ithi-dns-health-free-from-diseases-29nov16-en.pdf> slide 4.

One of the five areas is called “abusitis” and is defined as: "Domain name abuse is the registration or use of a domain name with the capability to cause spam, phishing, malware distribution or command and control of botnets." As expressed in SAC077, the SSAC is interested in the development of metrics regarding how domains are being used for abusive, fraudulent, or malicious purpose. However, the inclusion of the word “capability” is problematic because every domain name has the capability (potential) to be used for abusive purposes. In this case, the use of the domain name is at issue.

The ITHI presentation contains notes about symptoms, causes, risk factors, complications, and impacts. This kind of material can be helpful for readers inside and outside the ICANN community.

We note that the ITHI presentation focused on domain name subjects. As a project about identifiers, more thought about corresponding Internet Protocol (IP) address issues may be needed.

The SSAC is deeply interested in this topic. However, because of the issues raised above, the SSAC cannot yet substantially evaluate the work, and looks forward to continued progress.

Patrik Fältström  
Chair, ICANN Security and Stability Advisory Committee (SSAC)