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SSAC Comment on the Initial Report of the Temporary
Specification for gTLD Registration Data Phase 2
Expedited Policy Development Process

Preface

This is a comment to the ICANN Generic Names Supporting Organization from the ICANN Security and Stability Advisory Committee (SSAC) about its Initial Report of the Temporary Specification for gTLD Registration Data Phase 2 Expedited Policy Development Process.

The SSAC focuses on matters relating to the security and integrity of the Internet's naming and address allocation systems. This includes operational matters (e.g., pertaining to the correct and reliable operation of the root zone publication system), administrative matters (e.g., pertaining to address allocation and Internet number assignment), and registration matters (e.g., pertaining to registry and registrar services). SSAC engages in ongoing threat assessment and risk analysis of the Internet naming and address allocation services to assess where the principal threats to stability and security lie, and advises the ICANN community accordingly. The SSAC has no authority to regulate, enforce, or adjudicate. Those functions belong to other parties, and the advice offered here should be evaluated on its merits.

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Executive Summary

In this document, the SSAC provides input to the Initial Report of the Temporary Specification for the generic top-level domain (gTLD) Registration Data Phase 2 Expedited Policy Development Process (EPDP).

As an active participant in the EPDP and after a careful review of the initial report, the SSAC draws the following conclusions:

- The Phase 2 Report and its recommendations currently fall far short of what the SSAC believes is necessary and possible to address security and stability issues within ICANN's remit. The initial version of the System for Standardized Access/Disclosure (SSAD) would not deliver data in a way and at speeds that would satisfy many operational security needs, and that a better system is possible within the limitations imposed by the European Union's General Data Protection Regulation (GDPR). However, in order to move things forward today, the SSAC supports building a solid foundation that can be improved upon in a timely manner rather than holding out for an ideal system.
- The SSAC considers it essential that the EPDP produce a policy framework that will deliver a continual improvement process for the SSAD. Such a framework and process will be required for SSAC to support the final report. We also note that other constituencies have voiced similar concerns. Thus, we urge the EPDP team to finish its deliberation on the policy framework and include it in the final Phase 2 report. See 3.5 below for more.
- The EPDP engaged in discussions about providing guidance on "financial sustainability." This topic is out-of-scope and is not contained within the EPDP Charter. This sideline effort and the time dedicated to it at the expense of critical issues raised in the charter represents a fundamental failure in the work of this EPDP. The SSAC recommends work in this area be suspended. The SSAC further recommends more vigorous oversight of Policy Development Processes (PDPs) by the GNSO to ensure that future PDPs be required to stay within the remit of their charters, and changes to the charter be agreed to by participating groups prior to significant effort, time, and expense being applied to a non-charter area.
- From a process and working group management perspective, the SSAC is very disappointed with how the process of obtaining guidance from outside counsel has been handled throughout Phase 2. There has been a lack of clarity around the decision-making process, poor communication, consensus problems, and long procedural delays. This prevented the EPDP team from receiving the timely legal advice needed to resolve important questions, the answers to which are required by the charter for a successful outcome for the EPDP. The SSAC recommends that GNSO conduct a post-mortem review of the process of obtaining guidance from outside counsel.

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- To date, important in-charter issues involving the subject areas of natural-versus-legal persons, privacy/proxy service, and data accuracy are in danger of going unaddressed by the EPDP, with no clear plan for how they will be examined and resolved in the short time remaining.

In conclusion, the SSAC makes the following recommendations to the EPDP team and the GNSO Council:

1. The EPDP team should finish its deliberation on the policy framework for the continual improvement process for the SSAD and include it in the Phase 2 Final Report.
2. The GNSO Council should direct the EPDP team to suspend work on financial sustainability. Text regarding it should be removed from the Phase 2 Final Report, and any work developed so far can be passed along to a follow-on policy working group's charter.
3. The GNSO Council should ensure that future PDPs stay entirely within the remit of their charters, regardless of the desire of a majority of participants to explore other areas. If such areas are identified by a PDP, then the charter must be modified and agreed to by participating groups prior to significant effort, time, and expense being applied to a non-charter area.
4. The GNSO Council should consider the comments the SSAC has provided in Section 2 of this document in its deliberations on accepting the recommendations of the EPDP and any subsequent implementation of the approved recommendations.

1 Introduction

On 7 February 2020, ICANN opened a public comment proceeding to obtain input on the Initial Report of the Temporary Specification for gTLD Registration Data Phase 2 Expedited Policy Development Process (EPDP).¹ The initial report documents the EPDP team's (i) deliberations on charter questions, (ii) preliminary recommendations, and (iii) additional issues to consider before the team issues its final report.

The SSAC welcomes this opportunity to provide input. We thank the EPDP team for its hard work in delivering such a substantive report. In section 2, the SSAC makes several overarching comments to the report. In section 3, the SSAC comments on specific sections of the report.

2 Overarching Comments

2.1 Falling Short of What is Necessary and Possible

As part of the EPDP the SSAC has engaged in consensus-building, and as part of that process has compromised on many matters, as most participants have, in the interest of moving forward and getting a system online. For the avoidance of doubt, the Phase 2 Report and its recommendations currently fall far short of what the SSAC believes is necessary and possible to address security and stability issues within ICANN's remit. The SSAC does not think that the initial version of the System for Standardized Access/Disclosure (SSAD) will deliver data in a way and at speeds that will satisfy many operational security needs. We believe that a better system is possible within the limitations imposed by the GDPR. In order to move things forward today, the SSAC supports building a solid foundation that can be improved upon in a timely manner rather than holding out for an ideal system.

The EPDP team has been working with the understanding that the design and operation of the SSAD, along with supported use cases and access capabilities, will be continuously evaluated and improved upon. That has been the basis of SSAC's compromises. If the EPDP and the GNSO do not define a process that will deliver those improvements, and if the process is not relatively lightweight and will not deliver timely improvements, then the SSAD will be a failure from a security point of view. In particular, more automation is certainly possible and must be delivered, and response times per service level agreements (SLAs) for routine and high-volume security-related use cases need to become much shorter to reflect the realities of incident response.

The continual improvement process for the SSAD is of paramount importance. The SSAC considers the definition of a policy framework for such a process essential in order to garner support from the SSAC on the final Phase 2 report. We also note that other constituencies have voiced similar concerns. Thus, we urge the EPDP team to finish its deliberation on the policy framework and include it in the final Phase 2 report.

¹ See <https://gnso.icann.org/sites/default/files/file/field-file-attach/epdp-phase-2-initial-report-07feb20-en.pdf>

2.2 Failures in the Legal Guidance Process

The SSAC is very disappointed with how the process of obtaining guidance from outside counsel has been handled throughout Phase 2. There has been a lack of clarity around the decision-making process, poor communication, consensus problems, and long procedural delays. This led to obstacles in receiving the timely legal advice needed to resolve important questions, the answers to which are required for a successful outcome for the EPDP.

The EPDP team formed a legal committee, which all participating groups in the EPDP were allowed to join, and did. The purpose of the legal committee was to vet the questions and revise them as needed, as a means to free up the larger team and provide efficiency and predictability. It was agreed that if a question was approved by the legal committee, it would receive a quick review by the full EPDP team and questions would then be sent to the outside counsel, Bird & Bird. Under this arrangement, the SSAC formulated and submitted two questions, but neither of them were handled properly.

On 27 September 2019, the SSAC submitted a question about the handling of natural-versus-legal person data,² which per the EPDP's charter is an issue that Phase 2 is obligated to examine. On 1 October 2019, the legal sub-team examined the SSAC's question and agreed to discuss it further. However, the decision to batch multiple questions before submission to outside counsel, combined with an overly-long discussion and review process, delayed the submission of this question to Bird & Bird until March 2020. Given that the substance of the question was accepted months earlier, with only minor edits made after that point, this was an excessive delay for such a straightforward and uncontested question. The result is that the EPDP has not had time to discuss the legal advice, and the charter question remains unresolved.

The SSAC also wrote a question about balancing and the right to object.³ This is an important legal question, because some parties suggested that the data subject (not the data controller) has a right to decide whether his or her data will be turned over to a requester with legitimate purposes. Fashioned incorrectly, policy could also allow registrars to reveal the identities of law enforcement bodies and security operators who request data. The SSAC wanted this issue answered by outside counsel to potentially clarify SSAD policy and procedures, and to make sure that expectations and processes could be set for all parties participating in SSAD.

The SSAC submitted this question on 27 September 2019, which was discussed on legal sub-team calls in October 2019. On 15 October 2019, the legal committee decided that it knew what GDPR says on the subject, and so decided to remove the question from their further consideration. However, this decision and its rationale was not communicated to the full EPDP team on the subsequent call, nor was the full EPDP team asked to confirm the decision to set this question aside. Throughout Phase 2, there has been confusion around the formal process of question handling and the responsibilities of each subteam. Often, the status of a question was not clear to the entire team, and because of the uncertainty about who had the authority to approve or reject questions, some members were excluded from the decision-making process.

² See <https://mm.icann.org/pipermail/gnso-epdp-team/2019-September/002559.html>

³ *Ibid.*

In addition, there were some failures in the consensus process that the SSAC wishes to highlight. The issues of legal-versus-natural and WHOIS accuracy were in the EPDP charter and were deferred from Phase 1 to Phase 2. Because they were in the charter and work plan, the SSAC worked diligently on those issues and expected the EPDP's management and members to also take the charter mandate seriously. On the full EPDP team, the SSAC's question for outside counsel had almost unanimous support for moving forward, with only one of the nine participating groups objecting. However, the EPDP Chair decided that because one group objected, the question would not go to outside counsel. This was a surprising decision that inexplicably gave one group effective veto power in the process.⁴ This broke not only understandings within the EPDP team, but it also contravened the GNSO process, which does not require unanimous consensus in order to execute work tasks, especially about topics required by Charter.

It is unacceptable to allow one stakeholder group to disrupt and delay the legal fact-finding and expert information that are needed for the EPDP. Although the GNSO Council later decided to overturn this decision, agreeing on 18 March 2020 to send the questions to outside counsel, this process failure prevented the EPDP team from receiving necessary legal advice in a timely manner. In fact, the legal guidance has come so late that it cannot be included in Phase 2 at all, and had to be decoupled from the EPDP work owing to resource constraints, but was considered important enough to be retained for future work.

2.3 Not All Charter Work Will Be Completed

It appears that Phase 2 will not complete several of its Charter obligations. This is because of the delays in obtaining legal advice, because the group worked on some items that are outside the charter (see 3.3 below), and due to poor planning and execution. At the time of this comment, important issues involving the subject areas of natural-versus-legal persons, privacy/proxy service, and data accuracy are in danger of going unaddressed by the EPDP, with no clear plan for how they will be examined and resolved in the short time remaining. At the time of this writing, there is a proposal to add a third phase of work to the EPDP that would extend many more months to finish off all originally chartered work.

2.4 Delayed Research

The Phase 2 EPDP management team and the ICANN Organization did not initiate a required research project that the ICANN Board ordered in May 2019, until Phase 2 was almost finished. As a result, the required facts have not been available to inform discussions in Phase 2 deliberations. It is likely that the study eventually undertaken by ICANN Org will not produce results until after the time when it can realistically have any influence on the group's policy recommendations.

The Phase 1 Final Report recommended:⁵

⁴ See <https://mm.icann.org/pipermail/gns0-epdp-team/2020-March/003170.html>

⁵ See

<https://gns0.icann.org/sites/default/files/file/field-file-attach/epdp-gtld-registration-data-specs-final-20feb19-en.pdf>

EPDP Team Recommendation #17 [...]The EPDP Team recommends that as soon as possible ICANN Org undertakes a study, for which the terms of reference are developed in consultation with the community, that considers:

- The feasibility and costs including both implementation and potential liability costs of differentiating between legal and natural persons;
- Examples of industries or other organizations that have successfully differentiated between legal and natural persons;
- Privacy risks to registered name holders of differentiating between legal and natural persons; and
- Other potential risks (if any) to registrars and registries of not differentiating.

Accordingly, on 15 May 2019, the ICANN Board resolved that for Recommendation #17:⁶

The Board directs ICANN org to undertake the recommended study, to determine the costs and risks of differentiating between legal and natural persons.

ICANN Org did not undertake the recommended study in a timely manner as directed by the Board. In October 2019, the SSAC reminded the EPDP Phase 2 team and ICANN Org's supporting staff that this work needed to get underway, suggested a scope, and provided initial references to help the work along. In January 2020, the work was promised by ICANN Org to be completed by early to mid-May 2020, which will be too late to inform the EPDP discussions. Furthermore, as of April 2020, few details were provided about the scope and methodology of the study. This is another example of how core work and fact-finding were delayed.

2.5 Legitimacy of Policy-Making Process

The previous points illustrate processes within this PDP that were allowed to fail. It is disappointing when groups participate in community efforts such as this PDP, in good faith, and then have their diligent efforts handled unpredictably and outside of established processes. The GNSO creates charters explicitly so that working groups and the participants in them understand the deliverables. The GNSO has working group standards and procedures designed to carry out work in predictable and fair ways, and groups participating in working groups should be able to meet the commitments they make to each other. To its credit, the EPDP did generally work towards those standards and commitments, however, in such a critical policy-making exercise with intense external scrutiny, important elements cannot be ignored, delayed or handled poorly.

ICANN Board resolutions are part of a highly formal process and are expected to be executed. Participants in the community must rely on these shared expectations and decisions. When the established processes fail and critical elements are not addressed, it threatens the legitimacy of ICANN policy making on critical issues of global interest.

⁶ See ICANN Board Resolution of 15 May 2019, <https://features.icann.org/consideration-gnso-epdp-recommendations-temporary-specification-gtld-registration-data> and accompanying ICANN Board scorecard, Recommendation #17, page 5, <https://www.icann.org/en/system/files/files/epdp-scorecard-15may19-en.pdf>

At the time of this writing, there have been proposals floated about adding a third phase to the EPDP process to cover the topics that Phase 2 will not complete by the end of June 2020. There are several factors requiring a “hard stop” by that date. If that ends up being the outcome, then we need to avoid repeating these problems and prioritize finishing the long-outstanding work mentioned above. This would include having stricter guidance from and closer oversight by the GNSO Council along with the ICANN Board, and stronger commitments from community members who participate in subsequent work.

3 Comments on Specific Sections of the Report

3.1 Preliminary Rec #7 - Authorization for automated disclosure requests

The SSAC supports this recommendation and stresses the importance of the implementation guidance. As with any software, the ability to iterate and improve is vital. We view the proposed hybrid model as a marked improvement over the current disjointed and unpredictable situation, and one that will need to evolve as all parties learn and get experience over time to determine improvements needed.

3.2 Preliminary Rec #9 - Determining Variable SLAs for response times for System for Standardized Access/Disclosure of non-public gTLD registration data (“SSAD”).

The SSAC advises that the proposed definitions and timelines for the handling of the Priority 3 requests need to be adjusted.

The Initial Report proposes that:

- In Phase 1: cybersecurity requests are SSAD Priority 3 requests that must be fulfilled by data controllers within five (5) business days, while Uniform Rapid Suspension (URS) requests are Priority 2 and must be fulfilled by data controllers within two (2) business days .
- In Phase 2: the SLAs are relaxed, and cybersecurity (Priority 3) requests must be fulfilled within ten (10) business days.⁷

These targets are misaligned with the reasons that the SSAD is being created. Cybersecurity requests are usually a high priority. They will usually be operational in nature and are about preventing active and ongoing harm to multiple victims of the public during attacks (e.g., malware and phishing). Nor are operational cybersecurity requests less urgent than URS requests. Further, the overall model for the SSAD assumes that cybersecurity requests will be made by accredited parties, within an accountable system, thus mitigating the need for an extended review. SSAC recommends that operational security requests (by accredited parties) be

⁷ See pages 32-33 of the report, <https://gnso.icann.org/sites/default/files/file/field-file-attach/epdp-phase-2-initial-report-07feb20-en.pdf>

moved to Priority 2. If the volume of cybersecurity requests is of concern to the Contracted Parties, then a compromise for response within three (3) business days would be reasonable.

Requestors and contracted parties will gain confidence and improve efficiency over time, and so there is no reason for the response times to get longer and more relaxed over time. Thus it does not make sense to increase the length of time a data controller has to respond (as defined in the SLA) from Phase 1 to Phase 2 for any priority level of requests - they should stay the same or *decrease* between phases for the same priority. It may prove useful to have these SLAs reviewed by the standing mechanism (Rec #19) over time to ensure that the recommended SLAs are reasonable, and if they can be improved over time with automation and operational experience.

Cybersecurity use cases include both operational requests as mentioned above and those intended for longer-term research. In the latter case, where there is not an ongoing threat or attack, the need for data is less timely and could be considered a Priority 3 request. The SSAC notes that these separate use cases may need further delineation. The EPDP may want to delineate these in its preliminary work on automation, where various use cases that fall under Rec #4 are being more fully explored.

3.3 Preliminary Rec #15 - Financial Sustainability

The EPDP engaged in discussions about providing guidance on “financial sustainability.” This topic is out-of-scope, and is not contained within the EPDP Charter. This sideline effort and the time dedicated to it at the expense of critical issues raised in the charter represents a fundamental failure in the work of this EPDP. The SSAC is concerned that critical questions will remain unanswered. These types of issues are typically driven by a directive of a charter for a policy group or by an implementation review team.

The SSAC thus makes the following recommendations:

- Recommendation 1: All work on financial sustainability should be suspended by the EPDP, text regarding it should be removed from the Phase 2 Final Report, and any work developed so far should be passed along to the subsequent follow-on policy working group’s charter. If the EPDP continues to include this work item, then it should incorporate previous SSAC advice as detailed below.
- Recommendation 2: The GNSO Council should ensure that future PDPs should be required to stay entirely within the remit of their charters, regardless of the desire of a majority of participants to explore other areas. If such areas are identified by a PDP, then the charter must be modified and agreed to by participating groups prior to significant effort, time, and expense being applied to a non-charter area.

Should the EPDP Team insist on continuing work on this non-charter item, the SSAC points to prior advice it has provided in this area for guiding this work. In *SAC101v2: SSAC Advisory Regarding Access to Domain Name Registration Data*, section 5.4,⁸ the SSAC provided extensive guidance for this type of work that would include efforts far more substantial than those undertaken by the EPDP to date, including a formal assessment process. In particular:⁹

⁸ See SAC101v2: SSAC Advisory Regarding Access to Domain Name Registration Data

⁹ *Ibid.*

SSAC101v2 Recommendation 4: The initiation of charges for RDDS access, or any significant future changes in fees for RDDS access, must include a formal assessment of user impacts and the security and stability impacts, and must be conducted as part of a formal Policy Development Process (PDP).

While it is important that incremental costs to registrants not be tied directly to disclosure costs in order to be compliant with GDPR and other privacy laws, it is also important that the costs of the overall system for domain registration and management be ultimately borne by domain registrants taken as a whole, as a part of the assumed costs of said services. Such costs should include disclosures to third parties with rights to obtain redacted data in order to fulfill legitimate security, stability and resiliency (SSR) activities and potentially other legal activities (e.g., rights protections) that fall outside SSAC's scope of activities. The overall SSR of the DNS requires the ability to access such data to enable communications with the owners of compromised resources, as well as the determination of fraudulent and malicious activities that enable the suspension of registration services obtained by criminal actors.

As SSAC noted in SAC101v2:

Gated access with associated fees would be a major change to core principles in place for many years. Since registration data directory service (RDDS) is a core service, registry operators and registrars have always incorporated the cost of providing RDDS into their budgets as a basic cost of doing business. The cost of providing RDDS, DNS resolution, and the like have always been implicitly incorporated into the wholesale costs that registry operators charge their registrars for domain names, and the retail fees that registrars charge their registrants. The cost of the queries required to locate and mitigate domain abuse could be prohibitively expensive and very difficult to manage operationally. Any decision to change the status quo away from free RDDS access to charging for RDDS would be a highly consequential decision, raises security and stability issues, and must be justified via open and robust community process.

3.4 Preliminary Rec #16 - Automation

As stated in our comments on Recommendation #7, automation to the extent possible and permissible is essential and should be pursued. The SSAC has previously commented on the importance of automation in accessing RDDS data. In *SAC101v2: SSAC Advisory Regarding Access to Domain Name Registration Data*, section 3, we explain that numerous critical cybersecurity purposes¹⁰

... often require fast, automated access to domain registration data. The data is used by systems that must react quickly to security incidents (such as the maintenance of reputation lists used in firewalls), or because large numbers of records are needed due to the sheer volume of security incidents that occur each day.

It is therefore critical that the SSAD system be engineered with the data processing activities and mechanisms as outlined in this recommendation. It will be much easier to add, remove, modify,

¹⁰ *Ibid.*

or improve aspects of the SSAD system and the data request, review, and disclosure process if this is done. The SSAC stresses this as a critical piece of implementation guidance to the implementation review team (IRT).

3.5 Preliminary Rec #19 - Mechanism for the evolution of SSAD

The SSAC strongly supports the concept and rationale behind recommendation 19; the creation of a mechanism for the evolution of SSAD. ICANN has two primary methodologies for creating processes, requirements, and accountability for contracted parties to achieve operational and policy goals; contracts and consensus policy. Neither of these tools is particularly well-suited to adjusting the requirements of an evolving SSAD ecosystem where both data requestors and data controllers will be developing capabilities, learning and maturing effective processes, and continuously seeing changes in data request types and volumes. Those are the natural elements of a brand-new system in any environment. Further, as different types of abuse or operational needs manifest over time and where new legitimate uses of data come to light, it will be important to incorporate them into the standard operations of the SSAD. This recommendation provides a realistic foundation to create a process for making such updates without having to resort to the slow and protracted processes of contract negotiations or a PDP, and asks for inputs on how this may be feasible using existing processes within ICANN as a model.

The SSAC notes that there does not seem to be a current ICANN process that closely matches the one contemplated by this recommendation. There are some small, standing committees set up for various technical issues that may provide some guidance (e.g. Internationalized Domain Name (IDN)-related implementations, registry service evaluation policy (RSEP) reviews) and the IRT process itself could be looked at as a basis for creating a “standing” IRT of some sort. Regardless of the chosen mechanism, the scope of the work it can do and recommendations it provides must both be narrow in their application yet enforceable under existing policy and contractual terms. Thinking about an appeals process or other accountability measures may assuage some groups’ concerns about such a mechanism being either under or over-powered depending on one’s particular issues.

Finally, it should be noted that this is not a new concept, as such a mechanism was envisioned by the Expert Working Group on gTLD Directory Services. Its final report stated that “The RDS must be designed with the ability to accommodate new users and permissible purposes that are likely to emerge over time,”¹¹ and proposed a multi-stakeholder review board for this purpose. The EPDP members may wish to review this work to assist their own effort.

4. Recommendations

Recommendation 1: The EPDP team should finish its deliberation on the policy framework for the continual improvement process for the SSAD and include it in the Phase 2 Final Report.

Recommendation 2: The GNSO Council should direct the EPDP team to suspend work on financial sustainability. Text regarding it should be removed from the Phase 2 Final Report, and any work developed so far can be passed along to a follow-on policy working group’s charter.

¹¹ See <https://www.icann.org/en/system/files/files/final-report-06jun14-en.pdf>

Recommendation 3: The GNSO Council should ensure that future PDPs stay entirely within the remit of their charters, regardless of the desire of a majority of participants to explore other areas. If such areas are identified by a PDP, then the charter must be modified and agreed to by participating groups prior to significant effort, time, and expense being applied to a non-charter area.

Recommendation 4: The GNSO Council should consider the comments the SSAC has provided in Section 2 of this document in its deliberations on accepting the recommendations of the EPDP and any subsequent implementation of the approved recommendations.

5. Acknowledgments, Statements of Interests, and Objections and Withdrawals

In the interest of transparency, these sections provide the reader with information about four aspects of the SSAC process. The Acknowledgments section lists the SSAC members, outside experts, and ICANN staff who co-authored or contributed directly to this particular document (Contributors) or who provided reviews (Reviewers). The Statements of Interest section points to the biographies of all SSAC members, which disclose any interests that might represent a conflict—real, apparent, or potential—with a member’s participation in the preparation of this Report. The Dissents section provides a place for individual members to describe any disagreement that they may have with the content of this document or the process for preparing it. The Withdrawals section identifies individual members who have recused themselves from discussion of the topic with which this Report is concerned. Except for members listed in the Dissents and Withdrawals section, this document has the consensus approval of all of the members of SSAC.

5.1 Acknowledgments

The committee wishes to thank the following SSAC members for their time, contributions, and review in producing this report.

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5.2 Statements of Interest

SSAC member biographical information and Statements of Interest are available at:
<https://www.icann.org/resources/pages/ssac-biographies-2019-11-20-en>

5.3 Dissents and Withdrawals

There were no dissents or withdrawals.