Staff Report of Public Comment Proceeding

Recommendations for ICANN's Root Name Service Strategy and Implementation	
Publication Date:	7 January 2021
Prepared By:	Paul Hoffman

Public Comment Proceeding	
Open Date:	27 October 2020
Close Date:	8 December 2020
Staff Report Due Date:	5 January 2021

Important Information Links
Announcement
Public Comment Proceeding
View Comments Submitted

Staff Contact:	Paul Hoffman	**Email:**	paul.hoffman@icann.org

Section I: General Overview and Next Steps

The Public Comment submissions received were helpful in understanding the concerns of the ICANN community. Based on those comments, the Office of the Chief Technology Officer (OCTO) will create a new version of OCTO-016, "ICANN's Root Name Service Strategy and Implementation."

Section II: Contributors

At the time this report was prepared, a total of five (5) 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
Registries Stakeholder Group	Elizabeth Bacon	RySG
Verisign	Pat Kane	Verisign
Business Constituency	Steve DelBianco	BC
ARTICLE 19	Ephraim Percy Kenyanito	Art19
Root Server System Advisory Committee	RSSAC support staff	RSSAC

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).

RySG supports the goals of placing root server instances in diverse locations and protecting the root server system during attack.

Verisign opposes the idea of using encryption between resolvers and the root server system. Instead, it supports using QNAME minimization NXDOMAIN cut processing and aggressive DNSSEC caching. It also encourages better delineation of which strategies and implementation plans for IMRS and which are for the entirety of the root server system.

BC appreciates the goal of placing root server instances in diverse locations. It proposes that ICANN fund placement of IMRS instances in locations that cannot currently afford them. It proposes that ICANN org assist IoT manufacturers in creating designs that will not harm the DNS. It proposes that new efforts in monitoring the root server system should include research into the cost of such monitoring. It supports the deployment of hyperlocal root and proposes more outreach directly to ISPs for this. It supports ICANN investigating IMRS Cloud as a priority for future research.

Art19 supports the intention to expand and place root server instances in diverse locations, and supports information sharing through training and capacity building to encourage DNSSEC validation. They recommend that more effort and resources be dedicated and directed towards coordination with the ADD and DRPIVE working groups in the IETF. Art19 strongly oppose the proposition to develop and deploy monitoring systems as proposed in Section 3.2. “The use of network active probes is in blatant defiance of and disregard for freedom of expression and information.” Art19 supports investigation of IMRS Cloud.

RSSAC objects to ICANN conflating its roles and scope of influence between serving as the operator of the IMRS and acting as the body that ‘facilitates the coordination of the operation and evolution of the DNS root name server system’. RSSAC believes that extra care needs to be taken when describing the IMRS as it relates to the RSS. RSSAC objects to portraying the ability of the RSS to withstand attacks in a negative light and without statements backed by facts. “Highlighting those risks is important in any strategy document, but care should be taken so that community members have a complete and accurate picture of the ecosystem and how prepared it is for these potential risks.” On hyperlocal, RSSAC asks “Should ICANN promote a highly decentralized and unmanaged root resolution ecosystem with little to no visibility and zero accountability, or continue to evolve the existing decentralized yet managed root resolution system, with known and trusted operators, via a deliberative process of technical evolution that addresses changes?”

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’s OCTO will update OCTO-016 based on the input from the various stakeholders here. It will implement the strategies in the revised document over time.