



30 August 2019

Subject: SSAC2019-07: ICANN org's preparation toward implementation of a new round of gTLDs

To: Cyrus Namazi, Senior Vice President, Global Domains Division, ICANN

Dear Cyrus,

Thank you for sharing your informational email on 17 July 2019 about the readiness of ICANN org to support future rounds of new gTLDs. We reviewed the information, focusing on the aspects that fall within the scope of the SSAC. In particular, we note that item 2.5 states that, “[t]here will be no changes to the 1,000 TLDs/year maximum delegation rate.”

It remains the view of SSAC that the rate of 1000/yr was decided solely for administrative reasons and has no relevance for the security of the root zone. The SSAC’s advice on this topic is captured in SAC100: SSAC Response to the New gTLD Subsequent Procedures Policy Development Process Working Group Request Regarding Root Scaling.¹ The four recommendations, which are still valid as of this date, are:

1. ICANN should continue developing the monitoring and early warning capability with respect to root zone scaling.
2. ICANN should focus on the rate of change for the root zone, rather than the total number of delegated strings for a given calendar year.
3. ICANN should structure its obligations to new gTLD registries so that it can delay their addition to the root zone in case of DNS service instabilities. As stated in SAC100, “...ICANN should study the possibility of backing out, or undoing, changes to the root zone should complications with a change arise. This recommendation and the latter proposed study (see recommendation 4 below) should be completed prior to increasing the number of delegations in the root zone.”
4. ICANN should investigate and catalog the long term obligations of maintaining a larger root zone.

¹ See <https://www.icann.org/en/system/files/files/sac-100-en.pdf>

We encourage you and your Global Domains Division (GDD) colleagues to refer to SAC100 and SAC103² for a more detailed response to the GNSO New gTLD Subsequent Procedures Policy Development Process Working Group and a historical overview of previous SSAC advice on this matter. Other important references are RSSAC031³ and the IAB's letter to the ICANN Board regarding root scaling.⁴ Please do not hesitate to contact us for clarification or further information.

In addition to root scaling matters, it remains a significant concern for the SSAC that the last round of new gTLDs appears to have introduced the phenomenon of TLDs with exceptionally high rates of abusive registrations. It is also not clear if the ICANN Community is effectively addressing these potential threats and risks or what kind of deliberation will occur on how to mitigate them through consensus policy or contractual negotiation. The SSAC continues to be concerned that a further round of new gTLDs could be delegated prior to comprehensive metrics and mitigations being put in place to prevent such a recurrence. To assist the community, the SSAC is planning to study this issue and provide advice accordingly.

Best regards,

Rod Rasmussen
Chair, ICANN Security and Stability Advisory Committee

² See <https://www.icann.org/en/system/files/files/sac-103-en.pdf>

³ See <https://www.icann.org/en/system/files/files/rssac-031-02feb18-en.pdf>

⁴ See <https://www.iab.org/documents/correspondence-reports-documents/docs2009/2009-10-14-icann-scaling-the-root/>