

SAC131

SSAC Comments on Functional Model for Root Server System Governance

A Comment from the ICANN Security and Stability Advisory Committee (SSAC)
22 September 2025

Preface

This is a comment to the Root Server System (RSS) Governance Working Group (GWG) providing the observations of the Security and Stability Advisory Committee (SSAC) of the proposed Functional Model for Root Server System Governance. This report will also be submitted through the public comment proceeding on the Functional Model for Root Server System Governance.

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), technical administration 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. SSAC members participate as individuals, not as representatives of their employers or other organizations. SSAC consensus on a document occurs when the listed authors agree on the content and recommendations with no final objections from the remainder of the SSAC, with the exception of any withdrawals included at the end of the document.

1 Comment

The ICANN Security and Stability Advisory Committee (SSAC) commends the Root Server System (RSS) Governance Working Group (GWG) for developing the proposed Functional Model for the next steps on future RSS governance.¹ The SSAC recognizes the proposed Functional Model as an important step toward evolving governance of the RSS. The SSAC was pleased to participate in the GWG, which successfully brought together key stakeholders to produce a model that is thorough, transparent, and aligned with the foundational principles for the secure, stable, and resilient operation of the RSS.

The SSAC wishes to explicitly acknowledge the crucial role the Root Server Operators (RSOs) have performed over the years. Their steadfast stewardship and operational excellence have been critical to the global stability of the DNS. This architecture features:

- Independence at many different levels and dimensions of technology and operations.
- Resilient coverage throughout the world.
- Protocol and technology (e.g., anycast) that have evolved with the needs of the community.
- An exemplary uptime record.

The SSAC supports the proposed Functional Model as a structural foundation for coordination and decision-making to support future RSS governance.

The proposed Functional Model needs further specificity on several important issues::

- Clearly articulated governance principles that provide guardrails for decision-making and evolution of the governance structure.
- A structured, staged implementation roadmap that balances operational continuity with the need for incremental governance maturity.
- The emphasis on inclusivity, transparency, and performance accountability across all phases of the governance structure.
- The recognition of the importance of diverse stakeholder participation and liaison relationships to ensure broad technical and policy alignment.

The SSAC also notes the identification of funding stability for RSOs and their operations as an essential consideration. The SSAC supports and encourages continued dialogue among the community to explore sustainable funding approaches that safeguard long-term operational stability, reduce dependency risks, and ensure the RSS remains secure, reliable, and resilient.

¹ “Functional Model for Root Server System Governance.” ICANN Root Server System Governance Working Group.
<https://www.icann.org/en/public-comment/proceeding/functional-model-for-root-server-system-governance-11-08-2025>.

The Concept Model in RSSAC037 envisions the Root Server System Governance Board (RGB), the Root Server System Standing Committee (RSC), and the RSO Review Panel (RRP), as well as a Financial and Secretariat Function, potentially governed by ICANN's bylaws.²

The SSAC highlights the following operational specifics that the RSS Council must consider as important details to ensure successful implementation.

- **Define Operationalization of RSSAC037 Concept Model:** The current Functional Model lacks specifics on how it will operationalize the Concept Model outlined in RSSAC037. This ambiguity is a concern given the GWG's long-standing work on this issue. The RSS Council should develop a detailed plan for operationalizing the Concept Model, rather than deferring these critical questions.
- **Detail High-Level Principles:** High-level principles require sufficient detail to ensure clear implementation. For example, the RSS Council should specify the differentiated treatment for the designation and removal of RSOs.
- **Work Through Operational Details:** The RSS Council needs to address key operational details, including:
 - The formation of a secretariat.
 - Sustainable funding mechanisms.
 - The relationship to the ICANN community.
- **Clarify Interactions with Other Bodies:** The RSS Council must carefully consider and define how it will interact with other bodies crucial to the security and stability of the root zone, such as the CSC, RZERC, and SSAC.

Once the RSS Council convenes, the SSAC recommends that it prioritize the consideration of the operational specifics listed above. The SSAC also recommends continued attention to maintaining openness, adaptability, and fiscal sustainability as the governance structure moves from initiation to full operational maturity. At every step of the proposed multi-step phase, we recommend that the Council consult with the community to ensure both transparency and accountability.

The SSAC looks forward to providing additional advice and assistance as this important work progresses towards improved security, stability, resiliency, and accountability for the RSS.

² "RSSAC037: A Proposed Governance Model for the DNS Root Server System." ICANN Root Server System Advisory Committee (RSSAC), 12 June 2018.
<https://itp.cdn.icann.org/en/files/root-server-system-advisory-committee-rssac-publications/rssac-037-15jun18-en-15-06-2018-en.pdf>.

2 Acknowledgments, Disclosures of Interest, and Withdrawals

In the interest of transparency, these sections provide the reader with information about aspects of the SSAC process. The Acknowledgements section lists the SSAC members, outside experts, and ICANN staff who co-authored or contributed directly to this particular document or who provided reviews. The Disclosures 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 Withdrawals section identifies individuals who have recused themselves from the discussion of the topic with which this report is concerned. Except for members listed in the Withdrawals section, this document has the consensus approval of all of the members of SSAC.

2.1 Acknowledgments

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SSAC Members

Joe Abley
Maarten Aertsen
Jeffrey Bedser
KC Claffy
James Galvin
Warren Kumari
Danny McPherson
Ram Mohan
Russ Mundy
Peter Thomassen
Matt Thomas
Tara Whalen
Suzanne Woolf

ICANN Staff

Daniel Gluck
Michael Puckett
Carlos Reyes
Danielle Rutherford (editor)
Kathy Schnitt

2.2 Disclosures of Interest

SSAC member biographical information and Disclosures of Interest at the time of publication are available at: <https://www.icann.org/en/ssac/members/archive/16-05-2025>.

2.3 Withdrawals

Geoff Huston