

A response to “Second IANA Naming Function Review Team (IFR2) Initial Report”

Dear ICANN, I wish to thank you for the chance to comment on the IFR2 initial report. I am doing so in a private capacity, as an individual in the Internet, and a TCR in the east coast KSK processes. I am a board member of the IETF LLC, a member of the ISOC and an employee of the APNIC RIR and none of these associations have any relationship to this submission or my request for consideration here.

I have only one point of concern I would like to raise with you: This report does not canvas the location of the Hardware Security Modules (HSM) and ceremonies conducted using them, to manage the state of the DNSSEC trust anchor: The KSK and it's products. I feel this is a problem and requires re-consideration. ICANN should be seen to discuss the location of the HSM functions it performs as a worldwide trust.

I have no criticism to make of ICANN/IANA staff performing this function. I am a recent TCR and I have therefore seen them operate in the Culpeper facility, I am familiar with the personnel who implement this function. I have the utmost respect for them individually and as a team. All the evidence in documentation of outcome, process management and change, and my own observations of the task show this is being performed as the community at large would want: People involved take their role serious and perform this to the best of their collective ability.

My concern is that with 15 years of operations which were started with an East Coast and a West Coast HSM, The wider community has been required to acquiesce to a decision made under different times and circumstances regarding the location of the HSM. I do not have copies of mail to hand, but private communications received at the time when I noted this made it plain this was considered but it was not felt expedient to move directly to operation of an HSM outside of the continental USA. There was no substantive discussion of this matter, nor any discussion of a review process, nor a mechanism to commence a review of this decision. Considering the early stage of ICANN in it's lifetime and relationship to functions undertaken with the consent of the US department of state, or similar agencies, I can understand how this was not included at the time.

However I feel times have changed, and I wish to ask ICANN to begin a formal review of the conditions necessary to include a location outside of the continental USA in the set of places which operate an HSM for the management of the DNSSEC root trust. I do not specify how this review should happen although I expect a range of community consultation mechanisms can be used, many of which ICANN has already used. It is of course entirely possible this review will say there is no need, nor is this possible in the current circumstances but I would like the formalism of a public engagement to be undertaken, and a public review of decisions made regarding this function.

I also do not specify if this should be a relocation or an augmentation: If an existing east or west coast facility should be replaced by an HSM located elsewhere, or if an additional HSM should be added. I would note that in terms of functional simplicity, replacement would leave all operational duty cycles related to HSM functions exactly as-is, merely replacing a point of operation with another. Augmentation would necessitate a review of the duty cycles relating to the HSM, and production of signed materials. It is also clear this is not a zero-cost activity and therefore I am asking ICANN to consider an increase in the direct operational costs, and the incurrence of a continuing cost to manage a secure facility. Travel and related costs would broadly speaking be the same since existing travel requires financial assistance to several TCR and there would be no net change in that burden considering all the elements.

I wish to note as well that ICANN has offices in Geneva and Singapore, and without limiting ICANNs options for a location I consider either as highly suitable for operation and storage of an HSM in a secure facility. They have different qualities, but both represent well understood, developed, technologically and legally stable jurisdictions with an ability to manage international access which aligns with ICANNs mission and goals.

Why am I requesting this review? I am requesting this review of the locations of the HSM solely in the interest of a wider community interest in the integrity of the process. Not a lack of trust in ICANN or of the operations practices, or the staff. I simply feel that as a truly international body with engagement in national and international affairs, It is helpful for a perception of independence and equity in that context, to demonstrate unity of purpose by including the “rest of the world” in the process beyond the TCR roles. Ideally of course I would like ICANN to actually do a relocation of one of the HSM but the principle here is that it should be discussed, and a decision made on robust defensible grounds in the public interest.

There are also specific short-term concerns relating to freedom of movement of TCR participants to the USA which I believe should be considered, and the future risk of similar restrictions on access to the facilities in the US be borne in mind. If (for instance) the minimum quorum of TCRs cannot attend due to issues in visa and US immigration, there would be a loss of trust from the routine adoption of smaller quorum and mechanistic methods to get HSM related secure materials into use. This was enacted during Covid and so I have trust the actual mechanism is understood but it would seem plain this does not represent an ideal level of either “trust” or “community” involvement and inclusion.

I realise this will possibly be an unwelcome distraction for you, considering the IFR2 review process and if you feel this is not appropriate as feedback please let me know a mechanism to submit to, which will permit due consideration of this issue.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized 'G' followed by a horizontal line.

14 April 2025

George Michaelson