

**From:** Terry Manderson <terry@terrym.net>  
**To:** <DNSSEC@ntia.doc.gov>  
**Date:** Mon, Nov 17, 2008 6:01 PM  
**Subject:** Comments pertaining to the DNSSEC signing of the root zone

Attn: Office of International Affairs, NTIA

To whom it may concern,

I speak as a long term operator of DNS internet infrastructure, user of DNS infrastructure, participant in internet protocol infrastructure forums, and internet governance forums.

I appreciate the efforts by the NTIA to solicit feedback from the community as to the difficult decision on who signs the zone. My comments follow:

1) It should be reinforced that signing the root zone must happen. It is, I believe, dangerous for the ongoing security and stability efforts of the internet to ever consider a position of not signing the zone as a 'safe' option. The decision should not be rushed, however, the NTIA should be cognisant that delays will be costly in terms of technical implementation and adoption.

2) The current most trusted model for the internet community at large is via ICANN/IANA. This has been reinforced several times, through the outcomes of recent governance forums internationally, as a solid working model for both the internet names and internet numbers function. I suggest the NTIA consider the submission from ICANN to be most appropriate as it recognises, accepts, and implements feedback from the technical community in a consultative and collaborative approach and further allows for future feedback and transparency of the process and implementation by all appropriate parties.

3) The ICANN/IANA have a known history of communication with multi-faceted stake-holder communities. This communication is inherently important in maintaining the trust that the signing of the root zone represents. My recommendation is to consider the availability of communication channels open to such communities as a guide to the decision.

4) Technically speaking - I believe the ICANN submission to be most complete and offers an uncompromising level of security and trust. As ICANN holds the zone, there needs not be any additional exchange of delegation information to a third party prior to the act of signing. Further, the stated process of key behaviours offers sensible compromise in stability and activity to ensure stable repeatable processes.

I do thank the NTIA for seeking public comment for this topic. It is crucial that such lines of communication are maintained now, and in future, by the organisations involved in the management of the DNS infrastructure.

Sincerely

Terry Manderson