



UNITED STATES DEPARTMENT OF COMMERCE
The Assistant Secretary for Communications
and Information
Washington, D.C. 20230

MAR 31 2010

Mr. Peter Dengate-Thrush
Chairman of the Board of Directors
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

Dear Chairman Dengate-Thrush:

On February 12, 2010, the Internet Corporation for Assigned Names and Numbers (ICANN) posted for public comment a Strategic Initiatives paper that describes two proposed activities related to Domain Name System (DNS) security, stability and resiliency as well as an accompanying Global DNS-CERT Business Case. Given the importance of the Internet as a global medium to support economic growth and innovation, continuing to preserve the security and stability of the DNS remains a top priority for the National Telecommunications and Information Administration (NTIA). We therefore appreciate this opportunity to offer the views of the U.S. government on these proposals.

Preserving the stability and security of the Internet DNS is a shared responsibility among all actors in the DNS arena and NTIA thanks ICANN for initiating a public discussion on such an important issue and developing strawman proposals to generate community discussion about DNS security and stability. We believe that further data-gathering and community input is needed, including consideration of budgetary requirements, before these proposals can be considered for implementation.

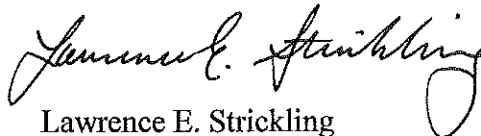
With respect to the specific Initiative 1 "System-wide DNS Risk Analysis, Contingency Planning and Exercises", while NTIA appreciates ICANN's efforts to identify the full range of risks to the operation of the DNS, the proposal does not provide sufficient data to support the proposed initiative. As a first step, we urge ICANN to work with all relevant stakeholders in developing a thorough gap analysis to permit the community to more effectively evaluate this proposed effort and subsequently to determine the best path forward.

In general, NTIA believes the concept of a DNS CERT has merit and deserves serious and thoughtful consideration. As the Internet matures, the need will increase for more effective mechanisms to enable the operators of the Internet's distributed infrastructure to work together to manage an incident affecting the DNS. However, we do not believe sufficient information is available on which to form an informed opinion of the specific proposal as described in Initiative 2 "DNS-CERT" and the accompanying "Global DNS-CERT Business Case". In addition to the substantive concerns with the proposal, global experience with CERTs has shown that their effectiveness and success are dependent upon the support and active participation of all the relevant stakeholders.

NTIA therefore views it as vital that ICANN consult fully with these critical stakeholders. NTIA also seeks to understand in more detail how this proposed effort would take into consideration and avoid duplication of existing activities such as the DNS Operations, Analysis, and Research Center (DNS-OARC) and national CERTs. In addition, the NTIA believes that ICANN needs to develop a more complete record with respect to the threats to, and vulnerabilities of, the DNS that the proposed DNS-CERT capability would help to mitigate. While ICANN management has made some preliminary assertions concerning these issues, the response from some members of the community, most recently at ICANN's 37th Annual Meeting in Nairobi, seem to suggest that a more complete risk assessment and gap analysis is needed. Finally, NTIA does not support any operational role by ICANN in the management of this capability, as we believe that such a role would be inconsistent with ICANN's core functions and might create conflicts of interest that would undermine the effectiveness and credibility of a DNS-CERT.

Lastly, given the prominent reference of the Affirmation of Commitments in the description of the two initiatives, NTIA believes it important to make clear that nothing therein mandates these two particular initiatives or implies any particular role for ICANN in connection therewith. Any activity that ICANN undertakes in this area should be consistent with its role as a technical coordinator of the DNS. NTIA believes that the security and stability of the DNS will continue to depend on broad-based, active engagement of all parties involved in the operations of the DNS. We therefore have reached out to key stakeholders to encourage a cross-industry led solution. We look forward to continuing the dialogue on this important subject.

Sincerely,



Lawrence E. Strickling

cc: Mr. Rod Beckstrom, President and CEO, ICANN