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**Electronic Submission**

Ms. Fiona Alexander  
Associate Administrator Office of International Affairs  
National Telecommunications and Information Administration  
Department of Commerce  
1401 Constitution Avenue, NW  
Room 4701  
Washington, D.C. 20230

**Re: AT&T Comments on NTIA Public Notice, Docket Number 1006033240-0240-01, Availability of Testing and Evaluation Report and Intent to Proceed with the Final Stages of Domain Name System Security Extensions Implementation in the Authoritative Root**

AT&T Inc, on behalf of its affiliates ("AT&T"), appreciates the opportunity to provide comments to the Department of Commerce's National Telecommunications and Information Administration ("NTIA") on its Domain Name System Security Extensions ("DNSSEC") testing and evaluation report and its plans to proceed with the final stages of DNSSEC implementation in the authoritative report.

AT&T supports NTIA's continued progress in moving forward with the implementation of DNSSEC. As a leading provider of global IP networking services and Internet connectivity, AT&T understands that ensuring the reliability, resiliency and security of the Internet's Domain Name and Addressing System ("DNS") is a critically important issue. The deployment of DNSSEC in the authoritative root zone is a positive step in helping to protect the DNS from threats such as cache poisoning attacks.

NTIA, appropriately, is taking a cautious and deliberate approach to DNSSEC implementation. As discussed in the testing and evaluation report, it is important to carefully measure and analyze the deployment of DNSSEC from an operational perspective. We support the continued focus on reliability and security issues as DNNSEC is implemented for the authoritative root zone and more broadly throughout the DNS. As AT&T has previously noted, we are concerned about the cumulative impact of implementing simultaneous changes to the DNS, such as DNNSEC, IPv6 and new gTLDs. Additional testing and analysis is needed to assess these issues as DNSSEC is deployed more broadly.

The testing and evaluation report also highlights the importance of managing the root zone Key Signing Key. As the report notes, this process must be transparent and designed to engender trust in the key management process. We appreciate NTIA's careful approach to these issues and believe that further community discussion and input is needed to develop a consistent framework for managing various aspects of the key management process.

AT&T appreciates NTIA's continued focus on security and stability issues. DNSSEC is one component of a comprehensive strategy for addressing the various types of security threats and challenges that are facing the Internet as it continues to evolve rapidly. We look forward to working with NTIA and other stakeholders on the development and implementation of effective solutions for enhancing the security and stability of the DNS.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. B. Fryer". The signature is written in a cursive, flowing style.