



Information Risk Management
SAN JOSE OFFICE

18 June 2010

To: Fiona Alexander
Associate Administrator, Office of International Affairs
National Telecommunications and Information Administration
US Department of Commerce
1401 Constitution Avenue NW, Room 4701
Washington, DC 20230

Dear Fiona,

PayPal welcomes the opportunity to provide comments on NTIA's [Notice of 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 Zone](#). Our business, like many others, relies heavily on the Internet and its continued availability, reliability, and security.

The DNS is an essential component of the Internet that if compromised in any significant fashion, would have devastating results. Given the known significant security vulnerabilities of the DNS, and the generally accepted wisdom that DNSSEC is currently the only viable option to mitigate some of these vulnerabilities, PayPal has been and remains supportive of deploying DNSSEC in the Root Zone.

We are heartened by the speed with which testing and evaluation were completed once the [Testing and Implementation Requirements for the Initial Deployment of DNSSEC in the Authoritative Root Zone](#) were published. While we would prefer that the overall process timeline be shorter, the time between requirements formalization and "final deployment" is to be commended. To the extent possible, we encourage all stakeholders to do what they can to accelerate the deployment process.

We endorse DNSSEC Implementation in the Authoritative Root Zone with the proviso that this is not viewed as an end state but rather a "final stage" of "an interim approach to meet a pressing need". We are certain that NTIA recognizes security of the Internet is an ongoing process requiring continual review and periodic change.

As stated in our [comments](#) to the original [Notice of Inquiry](#), we remain convinced that "vesting control of root zone signing in one entity is too tempting an attack target and too subject to political pressure from a single government or entity." We continue to believe that some form of M-of-N signing is a preferred longer-term mechanism, and encourage NTIA to work with the Internet community to further develop such an approach. We see the current implementation as an excellent first step and welcome its deployment in a timely fashion.

Sincerely,

Michael Barrett
Chief Information Security Officer, PayPal