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To: <DNSSEC@ntia.doc.gov>
Date: Mon, Nov 17, 2008 4:19 PM
Subject: Vote ICANN = +1 Comments regarding DNSSEC signing the root

To: Office of International Affairs
National Telecommunications and Information Administration

Thank you for requesting public comments about DNS security in the Federal Register (October 9, 2008 (Volume 73, Number 197), Page 59608-59612, docket Number: 0810021307-81308-01), "Enhancing the Security and Stability of the Internet's Domain Name and Addressing System", as posted at: <http://edocket.access.gpo.gov/2008/E8-23974.htm>
<http://www.ntia.doc.gov/DNS/DNSSEC.html>

I believe there is a fundamental conflict of interest in allowing VeriSign - a for profit company - to sign the root zone. Like the VeriSign's SSL certificate business, DNSSEC is based on the creation of a chain of digital signatures. It has been pointed out that a wealth of new security products and services will be built on this alternative source of trust - including certificate services. Because these new services will compete with VeriSign's primary certificate business, it will be difficult for VeriSign to be a trustworthy and objective guardian of this global resource, if not in reality, in perception. Consequently, assigning the root signing capability to VeriSign will deteriorate the trust in security DNSSEC is supposed to provide us all. Therefore, I believe signing the root should be part of the IANA function as performed by ICANN, which is a not for profit company subject to public service requirements.

Furthermore if, in having IANA sign the root, there arises a need to modify contracts between NTIA, ICANN and VeriSign, they should be done in parallel with any signed root testing and rollout period. A cursory review of the current IANA Function contract http://www.ntia.doc.gov/ntiahome/domainname/iana/ianacontract_081406.pdf paragraph C.4.1] reveals that details regarding root zone creation are deferred to the Cooperative Agreement between VeriSign and NTIA - a contract that has been routinely modified at least 30 times [<http://www.ntia.doc.gov/ntiahome/domainname/nsi.htm>]. So if there is truly a desire to move forward, it may be that only the Cooperative Agreement would need to be slightly modified.

In summary, I would urge to have ICANN, as part of the IANA function, sign the root. Thank you for your consideration of this very important topic

Sincerely,
Tae Joo