



Canadian Internet
Registration Authority

Autorité canadienne pour
les enregistrements Internet

November 24, 2008

Ms. Fiona Alexander
Associate Administrator
Office of International Affairs
National Telecommunications and Information Administration
United States Department of Commerce
1401 Constitution Avenue N.W., Room 4701
Washington, DC 20230
by email: DNSSEC@ntia.doc.gov

Dear Ms. Alexander:

Thank you for the opportunity to provide comments to the Notice of Inquiry regarding “Enhancing the Security and Stability of the Internet’s Domain Name and Addressing System”, Docket Number 0810021307-81308-01. The Canadian Internet Registration Authority (CIRA) respectfully submits the following for your considerations.

With particular regard to the Kaminsky vulnerability in the DNS protocol, we believe that the security of the Domain Name System needs to be bolstered to allow authentication of data and its origin. Towards that end, CIRA has recently announced its intention to deploy DNSSEC for dot-ca, Canada’s country-code top level domain (<http://www.cira.ca/en/media-room/news/236.html>).

The DNSSEC protocol extensions allow all tiers in the DNS hierarchy to either “opt-in” or not. Although this characteristic allows dot-ca, or any other TLD, to proceed with DNSSEC deployment independent of others, a signed root will reduce the complexity of managing the trust anchors and hasten adoption throughout the hierarchy. Taking the concrete step of implementing DNSSEC at the level of the root, to directly address a vulnerability inherent to the DNS protocol, should not be delayed due to separate considerations.

Debate and discussions on the institutional arrangements around the DNS have been occurring and will continue to occur along alternatives tracks. In the meanwhile, the

current organizations and operators charged with administering and operating the root have effectively and unwaveringly worked towards ensuring the stability and security of the DNS and, in doing so, have developed trusting relationships. The addition of new organizations into the chain of trust is likely to be counter to obtaining the desired goals in a timely fashion.

Thank you for your considerations.

A handwritten signature in black ink, appearing to read 'Byron Holland', written in a cursive style.

Byron Holland
President and CEO, CIRA

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About CIRA

The Canadian Internet Registration Authority (CIRA) is the not-for-profit, member-driven organization that manages Canada's dot-ca (.ca) domain name registry, develops and implements policies that support Canada's Internet community, and represents the dot-ca registry internationally.