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**To:** <dnssec@ntia.doc.gov>  
**Date:** Tue, Nov 25, 2008 1:48 PM  
**Subject:** Comments regarding the signing of the IANA root

Ms. Alexander,

Responding to the NTIA's RFC on docket # 0810021307-81308-01, Enhancing the Security and Stability (... of the DNS), my comments as CTO of CORE follow. As a modest introduction, CORE predates ICANN and was originally formed to provide an alternate vehicle for fundamental policy w.r.t. technical coordination of resources as well as a vehicle for the transformation of the monopoly contract for name services from a unified model to one with registry competition. The choice of ICANN as the "new entity" and the choice of competition in the registrar portion of the name service model, with minor changes brought about by new registries, of course is the situation at hand.

CORE operates the .museum and the .cat registries, and has undertaken to sign both zones and is currently working on making the DNSSEC infrastructure available to the .museum and .cat registrars and their registrants.

There should be no doubt in the minds of NTIA staff, DNSSEC is the appropriate choice and now is the appropriate time, and that key issues are a significant barrier to widespread adoption. There is the structural question of how trust anchors, for the DNS, but also, and equally importantly, for the routing system (sBGP et al), are managed, and if trust anchors for resolved identifiers and routed identifiers have a common, or disjoint management.

The problems of involving parties other than the USG in the management of the IANA root remain today unchanged from the period when CORE was conceived of by Dr. Jon Postel and others.

Thank you for this opportunity to convey our views to the NTIA, and we encourage the NTIA in its oversight role over the IANA root.

Eric Brunner-Williams  
CORE CTO