



Dear RSS-GWG Membership:

The RySG follows with interest the RSS-GWG work. A properly functioning Root Server System is essential to registry operators and their DNS role. We receive reports on RSS-GWG progress at regular intervals from the RySG reps and provide feedback on issues we think are important to the RySG and to the reliability of the RSS. With the pause in RSS-GWG work to reflect on the recently completed draft “principles,” we thought it appropriate for the RySG to provide comments as a whole rather than encourage individual comments, although that avenue is open to our members.

The RySG supports:

1. Root Server Operator autonomy: it is the variances in the operating models of the RSOs that contribute to the resilience of the Root Server System (RSS),
2. the principles calling for accountability and transparency of Root Server System Governance as a way to engender trust in that system,
3. that Root Server System Governance policy should be developed through the direct participation of the Root Server Operators and the RSS direct stakeholders, which should include the RySG,
4. that changes to the composition of the RSOs must be undertaken with caution, that designation/removal decisions must be based on objective & transparent criteria, and the number of RSO designations must be based on objective technical necessity, and
5. funding of the Root Server System Governance mechanism by ICANN, in a way similar to other stakeholder groups such as the GNSO: providing secretariat and other policy-making support.

Altered or Alternative Roots

The RySG notes with satisfaction the principle that an RSO has no authority to publish an altered or alternative root zone (subject to the implementation notes caveats). From the implementation notes, it appears that the prohibition applies to the ICANN-published root zone only and not to alternate root zones and naming systems being published recently. We think the principles should make clear the RSOs authority regarding these alternate roots, given their increasing prevalence.

Data Disclosure

Recommendation 3.5 (No data commercialisation) and its first implementation note brings to mind potential instances of data disclosure and the need to balance publication against privacy rights and the requirement for transparency regarding any data publication to third parties. Because privacy issues are high in the public’s mind, we think it’d be beneficial for the reputation of the RSS to include a principle addressing data privacy interests, the balancing taking place when addressing disclosure requests, and transparency regarding all data disclosures.

Funding of RSOs

With regard to funding of RSOs, we understand that this is a principles document and there will be detailed discussions to follow. We are also aware that funding discussions have not specified ICANN as the source of funding, but the idea that ICANN will provide some or all of the funding remains a possibility.

In past iterations of RSS-GWG work, the RySG has supported funding for selected Root Server Operators that demonstrate need. We continue to support that concept in order to foster the stability of the Root Server System as a whole. During implementation deliberations for this principle, we suggest that requests for funding by individual RSOs should also include a demonstration of need, and that the need should be part of the RSS GS's overall assessment of the funding request.

Generally speaking, the RySG would advocate for developing a funding model for RSOs that would not result in fee increases for ICANN contracted parties, as many RySG members in particular are small and newer businesses. We further caution the GWG that suggesting significant changes to ICANN's funding and revenue share models would likely spur extended community discussions that could delay the implementation of the RSS GS.

We hope that these comments are taken in the constructive nature intended. We'd be pleased to furnish clarifications, answer any questions, or arrange a dialogue with our subject matter experts. Thank you for taking the time to consider them.

Sincerely,

Registry Stakeholder Group