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AT-LARGE ADVISORY COMMITTEE

ALAC Statement on Second Security, Stability, and Resiliency (SSR2) Review Team Draft Report

Introduction

On 24 January 2020, Public Comment opened for [Second Security, Stability, and Resiliency \(SSR2\) Review Team Draft Report](#). On the same day, an At-Large [workspace](#) was created for the statement. The At-Large Consolidated Policy Working Group (CPWG) decided it would be in the interest of end users to develop an ALAC statement on the Public Comment. Laurin Weissinger, At-Large member and Vice Chair of the SSR2 Review Team, encouraged the ALAC draft a statement in response to the Public Comment. The CPWG agreed that the security, stability and resiliency of the Internet is a core issue for ICANN, and the Internet end user community At-Large.

During subsequent CPWG meetings, the SSR2 RT Draft Report was discussed at length and a drafting team was formed, including Jonathan Zuck, ALAC Vice-Chair for Policy and CPWG Co-Chair, Alan Greenberg, former ALAC Chair, and Lutz Donnerhacke, EURALO Board Member. Laurin Weissinger also provided feedback on the SSR2 RT Draft Report to the CPWG.

On 25 February 2020, the first draft of the ALAC statement was posted to its [At-Large workspace](#) by Alan Greenberg and Jonathan Zuck. A minor correction in the statement confirming a reference to the CCT Review was updated on 26 February 2020.

On 18 March 2020, the CPWG discussed the ALAC statement and incorporated [comments on its At-Large workspace](#) from Olivier Crepin-Leblond, CPWG Co-Chair, Marita Moll, ALAC Member, Sebastien Bachollet, EURALO Chair, Holly Raiche, ALAC Member, and Laurin Weissinger, SSR2 RT Vice Chair, in addition to comments from the drafting team members.

On 18 March 2020, ICANN policy staff in support of the At-Large community sent a call for comments to the CPWG mailing list.

On 19 March 2020, Alan Greenberg updated the ALAC statement after feedback from the CPWG and At-Large community.

On 20 March 2020, the drafting team finalized the ALAC statement.

On 20 March 2020, the ALAC Chair, Maureen Hilyard, requested that the statement be transmitted to the ICANN Public Comment process, copying the ICANN staff member responsible for this topic, with a note that the statement is pending ALAC ratification.

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The ALAC appreciates the opportunity to comment on the Second Security, Stability, and Resiliency (SSR2) Review Team Draft Report.

Ensuring the security, stability and resiliency of the DNS is arguably ICANN's single most important role.

SSR1 issued 28 recommendations. The ICANN Org reports indicated the Board judged all to be relevant and implementable and that all were fully implemented. The SSR2 analysis was that of the 28 recommendations, 2 were not implemented at all, 26 were partially implemented and none fully implemented. Of these 27 of the 28 were found to still be relevant. That is an astounding analysis 8 years after the acceptance of the SSR1 recommendations.

The ALAC has a particular interest in the recommendations related to domain name abuse, and notes that several of the recommendations overlap with and complement those issued by the RDS-WHOIS2-RT and the CCT RT.

The ALAC also notes that in the opinion of the SSR2 RT, many of the recommendations are deemed to be of high priority. Given the current interest in ICANN of prioritizing activities with the implicit effect of not addressing those lower on the list, this could lead to not addressing issues critical to the SSR of the DNS. DNS Security, stability and resiliency is not something that we can afford to ignore. The lead item in ICANN's Strategic Plan is **"Strengthen the security of the Domain Name System and the DNS Root Server System."** This must be taken into account when allocating resources and we trust that this will be taken into account when the Board works with the RT Implementation Shepherds on deciding how to prioritize the recommendation implementation.

The ALAC has a particular focus on and interest in DNS Abuse. To address this may require contractual changes to facilitate Contractual Compliance action. Such changes require either negotiations with the contracted parties or a PDP. A PDP will take considerable time and the ALAC does not advocate such a path, but rather it is time for ICANN Org and specifically Contractual Compliance to meet with those contracted parties who have shown an interest in DNS Abuse mitigation, and come to an agreement on needed contractual changes, factoring in not only penalties but any incentives that can be reasonably provided to encourage compliance.

Given the potential for rejection or deferral of the large number of high priority items, the ALAC encourages the review team to strengthen the justification on the high priority items.

Summary:

We are living in a world where many parties seem to have an interest in destabilizing critical infrastructure and the Internet in particular. The fact that our systems have been sufficiently robust in the past is not an indication that this is sustainable moving forward. ICANN needs to take seriously the need to professionally and rigorously ensure the SSR of its DNS operations. In particular, known vulnerabilities need to be corrected with the utmost haste.