The Non-Commercial Stakeholder Group Comment on the Plan to Restart the Root Key Signing Key (KSK) Rollover Process

The Non-Commercial Stakeholder Group (NCSG) is pleased to comment on the ICANN Org's **"Plan to Restart the Root Key Signing Key (KSK) Rollover Process."** We want to take this opportunity to comment on the plan – insofar as it is relevant and affects noncommercial Internet users of the Domain Name System (DNS).

The Non-Commercial Stakeholder Group (NCSG) represents the interests and concerns of noncommercial registrants and noncommercial Internet users of generic Top-Level Domains (gTLDs).

NCSG supports the decision to postpone the root KSK rollover that was originally scheduled for 11 October 2017, especially knowing that 1 out of 4 Internet users could have been affected by the rollover. While there is a structural challenge for determining an objective criteria to measure the impact of the root KSK rollover to users, we understand that ICANN's decision to continue with the rollover is equally fundamental for sustaining a stable, secure, and resilient Internet.

The research report[1] on data acquired from RFC 8145, *Signaling Trust Anchor Knowledge in DNS Security Extensions (DNSSEC),* shows that the majority of resolvers identified as still reporting only KSK-2010 came from devices with dynamic addresses or from resolvers forwarding on behalf of other resolvers, many of which could not be be identified and contacted – as stated in Section 2 of the Plan for Continuing the root KSK rollover. In order to minimise the unknown root KSK rollover impact on users and since ICANN is unable to contact these identified operators, data should be provided in the monthly snapshots of RFC 8145 trust anchor report (as proposed in Section 3.3) that will enable some Internet users know if their local operator is ready.

We recognise and support the ongoing outreach efforts by ICANN to minimise user impact on the day of the root KSK rollover. We also believe, however, that providing such data in the monthly trust anchor report will give those Internet users who identify their local operators as "not ready" an opportunity to reach out to them directly prior to the root KSK rollover date, as well as even post-rollover for faster resolution and reduced down time.

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[1] See: https://www.icann.org/news/blog/update-on-the-root-ksk-rollover-project.