
The Noncommercial Stakeholders Group (NCSG) represents the interest of Non-Commercial domain name registrants and end-users in the formulation of the Domain Name System (DNS) policy within the Generic Names Supporting Organization (GNSO). We welcome the opportunity to comment on the independent review of the ICANN Root Server System Advisory Committee (RSSAC) published on 26th of April, 2018. The root server system is a critical infrastructure resource whose governance and operation are of high interest to the Non Commercial Stakeholders Group (NCSG).

The NCSG is proud to have individual and organizational members in over 160 countries, and as a network of academics, Internet end-users, and civil society actors, we represent a broad cross-section of the global Internet community. Since our predecessor’s inception in 1999 (the Non-Commercial Domain Name Holders Constituency, NCDNHC), we have facilitated global academic and civil society engagement in support of ICANN’s mission, stimulating an informed citizenry and building understanding of relevant DNS Policy issues.

The NCSG thanks all the stakeholders who are directly involved in the review for improvement in the quality of works and advice of Root Server System Advisory Committee (RSSAC) to ICANN. It’s very worthwhile that root server system advisory committee has the expertise in term of technical and policy for the objectives. However, capacity building for RSSAC would go a long way for broad functionality as the RSSAC is the only interface between Root Server Operators and ICANN.

There is a need for RSSAC to embrace diversity as this will help fill the skills gap that seem currently lagging as expressed in the review. From the recommendation (1), it clearly shows how the current RSSAC does not embrace diversity by excluding the key stakeholders who are directly involved in serving the root and the provisioning side. Therefore, the NCSG is in support that the Root Server System Advisory Committee to be a group that is diverse in its membership, interest, perspective and contributions.

The NCSG would also be pleased to see a defined and clarity in the setting and discharge of RSSAC as this would not only help in measuring the group transparency but compliance to an accountable system. A clear agenda of the RSSAC would not only make RSOs who are unwilling to participate in RSSAC but willing to commit their time and resources.

With respect to recommendation (1b) that states “Let Individual RSOs decide whether or not to participate in the RSSAC”. NCSG may conclude that some RSOs are not willing to participate because of ICANN oversight to the operation and governance of the root server system. We encourage RSSAC to be committed to a system that is accountable and
transparent as to enable all RSOs to willingly participate. By doing this, we would have a
diverse RSSAC that would represent and appropriately advise ICANN as pertain to the root
server system.

The NCSG got interest to comment on the quality of compliance to the defined set standard
(RSSAC002) by the RSOs. This raises some level of concern on the due diligence that went
into the set standard knowing that some RSOs reluctantly or would not be part of RSSAC.
While RSSAC is coordinating the gathering of meaningful data, we must have it plainly that
the consensus of the defined standard by the RSOs will support compliance.

It is important that any group that would represent and advise ICANN to be committed to the
principle of transparency that ICANN rides. The perception that RSSAC is a closed and
secretive group does not speak well for the whole ICANN as this is an image representing
ICANN to the stability of the root server system. The NCSG considers this a priority and
should be a matter of urgency considering the impact this might have on the operation of
RSSAC and other stakeholders to the root server system.

Thanks once again for opening this review to the NCSG community and appreciate the
opportunity to comment and share our perspective with respect to the review of RSSAC. We
firmly support diversity in the operation and membership of RSSAC in an open and
transparent manner. And that, of clarity in purpose that would allow all the RSOs be willing
to participate and comply to RSSAC as a body representing ICANN to the root server system.