**BC Comments to SSR DRAFT – April 6, 2012 – initial DRAFT**

**RECOMMENDATION 1**: ICANN should publish a single, clear and consistent statement of its SSR remit and limited technical mission. ICANN should elicit and gain public feedback in order to reach a consensus-based statement.

BC Comment:

In general, support. However ICANN should develop and manage an improved approach to public comments, which prioritizes comments and interactions from affected parties, and not rely on a public commnt period to engage parties, such as web hosters, IXPs, ISPs. Priority should be given to informed comments, which are in some cases in need of solicitation, and direct outreach, as well as ICANN’s interactions with contracted parties, ASO, ccNSO, and entities who operate recursive servers, or major parts of the Internet’s infrasctucture, or provide security apps. This may require further outreach by the SSR RT/supported by key ICANN staff.

**RECOMMENDATION 2:** Once ICANN issues a consensus-based statement of its SSR remit and limited technical mission, ICANN should utilize consistent terminology and descriptions of this statement in all materials.

BC Comment:

Support. However the process to gain consensus must be effective, and engage the SOs/ACs/SGs/Constituencies and affected parties [noted above] fully.

**RECOMMENDATION 3:** ICANN should document and clearly define the nature of the SSR relationships it has within the ICANN community in order to provide a single focal point for understanding the interdependencies between organizations.

BC Comment:

Support. This is an important element, and will strengthen ICANN’s interactions and the ability of the ICANN community to fully engage, and support ICANN’s activities in SSR.

**RECOMMENDATION 4:** ICANN should use the definition of its SSR relationships to encourage broad engagement on SSR matters using this to create an effective and coordinated SSR approach.

BC Comment: Some of these recommendations probably require reordering. In the meantime, Until ICANN defines, and gains support from community on what it is involved in directly, versus coordinating, or ‘supporting’ this recommendation is too vague to comment on.

**RECOMMENDATION 5:** ICANN should publish a document clearly outlining the roles and responsibilities for both the SSAC and RSSAC in order to delineate the activities of the two groups. ICANN should seek consensus for this across both groups, recognising the history and circumstances of the formation of each. ICANN should consider appropriate resourcing for both groups, consistent with the demands places upon them.

Comment: In general support further dialogue and understanding of roles. However, the first priority should be furthering existing relationships. The SSAC is very unique from the RSAC, including the fact that SSAC receives ICANN funding; has ICANN staff support, etc.

 The RSAC , and its participants, are a very different entity, and should be so respected in ICANN’s interactions., and in the interactions of the SSAC. This section may deserve further discussion. RSAC has a unique role, and responsibilities that are not defined by ICANN, per se. This is not well understood by ICANN participants, and an easy to understand document will be helpful.

**RECOMMENDATION 6**: ICANN’s definition and implementation of its SSR remit and limited technical mission should be reviewed in order to maintain consensus and elicit feedback from the community. The process should be repeated on a regular basis, in conjunction with the cycle of future SSR reviews.

Comment:

in general, support. The tough issue is how to engage knowledgeable and informed participants from the community in the review. The AoC mandated Reviews will result in a reoccurring review, thus this recommendation is duplicative.

**RECOMMENDATION 7:** ICANN should build on its current SSR Framework by establishing a clear set of objectives and prioritizing its initiatives and activities in accordance with these objectives. This process should be informed by a pragmatic cost-benefit and risk analysis.

Comment:

Support. However, we do have further questions about how this will work.

**RECOMMENDATION 8:** ICANN should continue to refine its Strategic Plan objectives, particularly the goal of maintaining and driving DNS availability. It also should establish more direct connections between specific priorities and projects in the SSR Framework and the Strategic Plan.

Comment:

Support. The BC finds that the level of detail in the Framework and the Strategic Plan are so limited that it is challenging in many areas, including SSR. Since so much of ICANN’s budget is implicated by these responsibilities, more detail is essential.

**RECOMMENDATION 9:** ICANN should develop a roadmap that leads towards more formal and widely adopted certification of its SSR-related processes in line with industry best practice.

Comment: support. Use of ISO and IEEE standards, for instance, or others that re globally recognized for standards/security areas.

**RECOMMENDATION 10:** ICANN should continue its efforts to step up contract compliance enforcement and provide adequate resources for this function. ICANN also should develop and implement a more structured process for monitoring compliance issues and investigations.

Comment:

Contract compliance enforcement improvement is essential. While this has been called for in other public comments, this must be a priority.

**RECOMMENDATION 11**: ICANN should finalize and implement measures of success for new gTLDs and IDN fast track that expressly relate to its SSR-related program objectives, including measurements for the effectiveness of mechanisms to mitigate domain name abuse and consumer confusion.

Comment: The GNSO Policy Council has a working group entitled : Consumer Choice, Confidence and Competition : reference this work?

**RECOMMENDATION 12:** ICANN should support the development and implementation of SSR-related best practices through contracts, agreements, MOUs and other mechanisms.

Comment: These proposals are unclear in how they would work, and whom they apply to. While it is worthwhile to consider MOUs, such mechanisms will require board level review and approval. Contracted party agreemenrts [explore]. Many non contracted parties are affected, or contribute to the SSR issues: further exploration of how to work with such parties is worthwhile. Voluntary Codes of conduct may be very useful in such circumstances.

**RECOMMENDATION 13:** ICANN should encourage all Supporting Organizations to develop and publish SSR-related best practices for their members.

Comment: This is a wide ranging suggestion. This would imply ASO, ccNSO, and GNSO ‘best practices’. This may not be a practical approach for the GNSO’s constituencies/SGs. Contracted parties are different from other participants in the GNSO. Further discussion is needed. The ASO and ccNSO should advise on their receptivity to this suggestion, Some parts of the GNSO’s constituencies may be interested, sucha s ISPs and business users, but this doesn’t seem applicable to indiviudual users, or academic participants in NCUC.

**RECOMMENDATION 14:** ICANN should ensure that its SSR related outreach activities continuously evolve to remain relevant, timely and appropriate. Feedback from the community should provide a mechanism to review and increase this relevance.

Comment: Support. ICANN is however, a long way away from having useful materials and activities that translate, or are transportable into such global settings,

**RECOMMENDATION 15:** ICANN should publish information about DNS threats and mitigation strategies as a resource for the broader Internet community.

Comment: support, but suggest that such materials should be made appropriate to the audiences targeted, with appropriate language translation.

**RECOMMENDATION 16:** ICANN should continue its outreach efforts to expand community participation and input into the SSR Framework development process. ICANN also should establish a process for obtaining more systematic input from other ecosystem participants.

Comment: Support.

**RECOMMENDATION 17:** ICANN should establish a more structured internal process for showing how activities and initiatives relate to specific strategic goals, objectives and priorities in the SSR Framework. It also should establish metrics and milestones for implementation.

Comment: Support. However, this must include the community’s participation in determining priorities.

**RECOMMENDATION 18:** ICANN should conduct an annual operational review of its progress in implementing the SSR Framework and include this assessment as a component of the following year’s SSR Framework.

Comment: Support.

**RECOMMENDATION 19:** ICANN should establish a process that allows the community to track the implementation of the SSR Framework. Information should be provided with enough clarity that the community can track ICANN’s execution of its SSR responsibilities, while not harming ICANN’s ability to operate effectively. The dashboard process being used to track implementation of the ATRT recommendations serves as a good model.

Comment: Support

**RECOMMENDATION 20**: ICANN should increase the transparency of information about organization and budget related to implementing the SSR Framework and performing SSR-related functions. Information should be provided with enough clarity that the community can track ICANN’s execution of its SSR responsibilities, while not impeding ICANN’s ability to operate effectively.

Comment: Support.

**RECOMMENDATION 21:** ICANN should establish a more structured internal process for showing how organization and budget decisions relate to the SSR Framework, including the underlying cost-benefit analysis.

Comment: Support. This must be part of the Framework, and then the draft Budget, with sufficient detail to enable public comment.

**RECOMMENDATION 22:** ICANN should publish, monitor and update documentation on the organization and budget resources needed to manage SSR issues in conjunction with introduction of new gTLDs.

Comment: support. This is an undefined area, and will require additional resources than have been presently identified. It is however, important to ICANN’s integrity in how it carries out its core mission.

**RECOMMENDATION 23**: ICANN must provide appropriate resources for SSR-related working groups and advisory committees, consistent with the demands placed upon them. ICANN also must ensure decisions reached by working groups and advisory committees are reached in an objective manner that is free from external or internal pressure.

Comment: Support. The implication in this is that such groups may require funding for travel or expert advice. This deserves more thought. The SSAC is allocated funding for certain aspects of travel, etc. If there are other SSR working groups, such a model may be needed.

**RECOMMNDATION 24:** ICANN must clearly define the charter, roles and responsibilities of the Chief Security Office team related to implementing plans that are designed to address longer-term risks.

Comment: Support. This needs more visibility, and more consultation to support this important functional role.

**RECOMMENDATION 25:** ICANN should put in place mechanisms for identifying longer-term risks and strategic factors in its risk management framework. This process should be informed by insights from research, business partnerships, ICANN supporting organizations and other sources. ICANN should publish information about longer-term risks, recognizing the sensitive nature of some of these factors.

Comment: Support. This is not as easy as it sounds, as publishing risks often includes advertising such risks. However, industry leaders in this area have some experience in such approaches. It may require a two tier approach to publishing information.

**RECOMMENDATION 26:** ICANN should prioritize the timely completion of a risk-management framework. This work should follow high standards of participation and transparency.

Comment: Support. A time frame should be agreed.

**RECOMMENDATION 27:** ICANN’s risk-management framework should be comprehensive within the scope of the SSR remit and limited missions.

Comment: Support

**RECOMMENDATION 28:** ICANN should continue to actively engage in threat detection and mitigation, and participate in efforts to distribute threat and incident information.

Comment : Support. ICANN must play a range of rôles in thèse areas, including catalyzing participation by various stakeholder groups, as well as its own contribution, and collaborating with such groups as Root server operators ; groups of ccTLDS/CcNSO ; contractd parties, and others who are affected via their role in operating some part of the CIR.