



Comment on Draft Framework for Registry Operator to Respond to Security Threats

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Business Constituency Submission

GNSO//CSG//BC

Background

This document is the response of the ICANN Business Constituency (BC), from the perspective of business users and registrants, as defined in our Charter:

The mission of the Business Constituency is to ensure that ICANN policy positions are consistent with the development of an Internet that:

1. promotes end-user confidence because it is a safe place to conduct business
2. is competitive in the supply of registry and registrar and related services
3. is technically stable, secure and reliable.

Draft Framework for Registry Operator to Respond to Security Threats

The BC appreciates the opportunity to comment on the Draft Framework for Registry Operator to Respond to Security Threats (the "Draft")¹. This is a potentially important next step in enhancing security and stability of the DNS through Registry Operator ("RO") level procedures for handling security threats and abuse within the Domain Name System ("DNS"). The BC has a long and well-documented history of supporting safeguards and procedures against DNS abuse.² While we commend the drafters for a sensible approach to laying the groundwork for what may ultimately become a more robust best practices program, we recommend the following changes and additions to the Draft:

- More definitions. For example, the Draft refers to "significant threat of disruption to the DNS" and, without more, it is difficult to understand what falls within that bucket, or for an RO to truly adhere to a uniform best practice to address "significant threat of disruption to the DNS";
- Direct call to action. The Draft often "encourages" or suggests ROs "may choose" to take certain actions. Although this framework is meant to be voluntary and non-binding, in order to be produce any sort of uniform best practices, it should provide a more direct call to action, by using more direct language (e.g., "should" or "will"). As a voluntary and non-binding framework, those who choose to subscribe should have a clear roadmap of the outlined best practice.
- Content. The Draft discusses how ROs should evaluate the content of abuse reports. This may be a difficult exercise when there is no uniformity to the substance and format of abuse reports.

¹ ICANN public comment page, at <https://www.icann.org/public-comments/draft-framework-registry-respond-security-threats-2017-06-14-en>

² See BC Positions at http://www.bizconst.org/assets/docs/positions-statements/2016/2016_05may_bc-comment-on-safeguards-to-mitigate-dns-abuse.pdf (Comment on New gTLD Program Safeguards to Mitigate DNS Abuse);

See BC comment at http://www.bizconst.org/assets/docs/positions-statements/2016/2016_07july_20%20bc%20comment%20on%20proposed%20gTLD%20base%20registry%20agreement%20final.pdf (Comment on Proposed Amendments to Base New gTLD Registry Agreement);

See BC comment at http://www.bizconst.org/assets/docs/positions-statements/2017/2017_05May_19%20BC%20Comment%20on%20CCTRT%20recommendations.pdf (Comment on Competition Consumer Trust & Consumer Choice Review Team Draft Report of Recommendations for New gTLDs);

Also see http://www.bizconst.org/assets/docs/positions-statements/2017/2017_05May_22%20BC%20reply%20to%20questionnaire%20on%20new%20gTLD%20Subsequent%20Procedures.pdf (Reply to Questionnaire from new gTLD Subsequent Procedures PDP)

As such, we recommend that the drafters be directed to work together with relevant ICANN Security staff to produce addendums to the Draft that contain suggested language for abuse reports. These “templates” could be published as part of any public reporting interface for abuse, making the reporting process and digestion of those reports more predictable and uniform in both submission and response by ROs.

Finally, once the Draft is revised to result in more direct, concrete, and implementable action items to be considered a “best practice”, the BC recommends that a next step should be ICANN’s formulation of an incentive program to encourage ROs to subscribe to the resulting best practices. As noted in a previous BC comment:

The BC supports enabling ICANN to reduce registry fees to incentivize Registry Operators to engage in practices that help mitigate the proliferation of abusive domain names in their TLDs, and thereby support and enhance internet security and contribute to a healthy domain name ecosystem. There is strong precedent for ICANN unilaterally reducing contracted party fees to promote such good behavior. For example, at various times in the past ICANN unilaterally reduced fees for registrars that adopted a new RAA, ended “drop catching,” and stopped “domain tasting.”³

With an ICANN supported and incentivized best practices document/program, we are sure to see more support through increased and documented RO subscription.

Conclusion

While the BC supports all the efforts that led to and formed the Draft, it believes the Draft requires some revision to truly become the basis for a voluntary RO best practice program that addresses security threats in the DNS. Without more definition, direct call to action, or uniform abuse reporting mechanisms, it is hard to imagine how best practices emerge from the Draft -- leaving us with a mere list of well documented possible/sensible approaches for handling security threats in the DNS.

Additionally, it is also hard to see a path beyond this Draft without ICANN’s full support via an incentive program. As such, we encourage the drafters and ICANN to take the logical next steps in this process to ensure that the hard work to-date is not wasted and that a best practices program for handling security threats in the DNS can emerge from all of this work.

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This comment was drafted by Denise Michel.

It was approved in accordance with the BC charter.

³ See top of page 1 of BC Comment on Proposed Amendments to Base New gTLD Registry Agreement at http://www.bizconst.org/assets/docs/positions-statements/2016/2016_07july_20%20bc%20comment%20on%20proposed%20gTld%20base%20registry%20agreement%20final.pdf