



**Comments from the Internet Infrastructure Coalition (i2Coalition)
On the Second Security, Stability, and Resiliency (SSR2) Review Team Draft Report**

In brief: Security and curbing abuse are both vitally important to the Internet; however, we need to point out that the recommendations go beyond what is appropriate for a Review Team in terms of scope.

Overreaches include dictating changes to the RAA and RA and other policy-based recommendations, and/or recommendations that in effect work against efforts of PDPs already underway.

The Internet Infrastructure Coalition (i2Coalition) appreciates the opportunity to comment on Second Security, Stability, and Resiliency (SSR2) Review Team Draft Report.

The i2Coalition's diverse membership represents both large and small Internet infrastructure providers such as web hosting companies, software services providers, data centers, registrars and registries. The i2Coalition has several key goals within ICANN, but chief among them is continuing to build a voice for underrepresented parts of the Internet ecosystem – in particular web hosts, data centers and cloud infrastructure providers – and ensuring that accountability and transparency are paramount. The i2Coalition brings unique representation to ICANN as it is made up of companies representing the broad ecosystem of Internet infrastructure companies.

We offer the following general comments on the Second Security, Stability, and Resiliency (SSR2) Review Team Draft Report.

While we are pleased with the fact that the Review Team took their task of looking at ICANN's execution of its commitment to enhance Security, Stability, and Resiliency very seriously, we are concerned that the draft report exceeds the Review's scope in many of the recommendations.

The review team's remit as noted in the bylaws, is specific and limited to *"ICANN's **execution of its commitment to enhance the operational stability, reliability, resiliency, security, and global interoperability of the systems and processes, both internal and external, that directly affect and/or are affected by the Internet's system of unique identifiers that ICANN coordinates.**"* (emphasis added) . However, the recommendations overreach this remit, in terms of ICANN's governance and functioning mechanisms, as they advocate in a

number of recommendations for unilateral, top-down action from the Board or ICANN Org on new and/or under-development policy matters. Specifically, recommendation 10 (Improve the Framework to Define and Measure Registrar & Registry Compliance) which is rated with a High Importance, and has among its sub-recommendations unilaterally amending contract clauses (10.3) and closing the EPDP while unilaterally implementing a new WHOIS policy (10.4). Further, recommendation 12 outright describes the direct and sole role that the Board should play in the creation of legal and appropriate access mechanisms to WHOIS data. Even more, recommendations 15 and 16 argue for “enhancing” and “changing” contracts, respectively. All three recommendations, 12, 15 and 16 are rated High Importance.

We ask that the draft report be revised to take these concerns into consideration. We believe that the topics of resilience, security, and stability are crucial, and they should be taken seriously by those in charge of reviewing them for the ICANN ecosystem. Arguing for unilateral changes to contracts and getting ahead of the Policy Development Processes are not and cannot be normal recommendations to come out of such a review.

Thank you for the opportunity to comment.