

## FIRST comments on the SSR2 Review

The DNS is a core infrastructure of the Internet, and thus critical to the proper functioning at all scales. While proposed norms already limit states from attacking or misusing the DNS things look bleak when it comes to cyber crime, which is affecting millions of Internet users daily. FIRST welcomes that the SSR2 addresses this issue.

FIRST member teams deal with computer security incidents on a daily basis. Almost every time the DNS is (ab-)used by actors in one way or another to achieve their malicious goals. To mitigate risks for Internet users and guarantee a stable DNS, CERTs around the globe work closely with registries and registrars operation teams and abuse desks. While most of the DNS industry acts responsibly and appropriately, there unfortunately are some organizations that lack provisions to stop domains from being misused and act slowly in case of incidents.

FIRST therefore welcomes the SSR2 recommendations 10, 11 and 13 and looks forward to seeing an implementation of these recommendations.

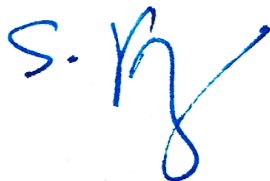
FIRST supports the multistakeholder approach to protect and safeguard all aspects of the DNS and encourages ICANN to do the same. Unfortunately today, it seems that the DNS ecosystem gives an economic benefit to industry players that don't invest in fighting abuse. FIRST encourages ICANN to help stakeholders find the right balance between economic considerations and security requirements.

Much of the SSR activities support these goals, yet the recommendations seem to focus mostly on technical and procedural aspects and neglect the soft fabric of the global Internet community.

In particular FIRST suggests, that the following points are taken into consideration

- ICANN prompt that all registries operate incident response teams
- ICANN promotes and enforces responsible behaviour for registrars
- ICANN works toward a standard to report abuse to registries and registrars
- ICANN develops in a true multistakeholder fashion the development of norms for the domain industry to fight cybercrime.

FIRST looks forward to working with ICANN to further fight the abuse of the Domain Name System.



Serge Droz  
Chair FIRST Board of Directors



Michael Hausding  
Co-Chair FIRST DNS Abuse SIG