



Public Comment on Second Security, Stability, and Resiliency (SSR2) Review Team Final Report

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

Comments

The i2Coalition welcomes the opportunity to comment on the Final Report by the SSR2 Review Team. We would like to identify two general but interconnected concerns with the report. First, we believe that recommendations that may lead to potential duplicative work should not be approved. Relatedly, we believe that recommendations that are not supported by a clear problem statement are similarly improper and should not be approved.

Duplicative Work

The i2Coalition is in support of the community work already happening throughout the whole of ICANN, and believes that recommendations which are repetitive or directly duplicative are not in the best interest of ICANN. To that end, we urge the board to

support recommendation 1 and take action on it by identifying potential duplicative work. For instance, Recommendation 17 is potentially duplicative with the existing Name Collision Analysis Project (NCAP) study. There are certainly several others throughout the report that merit thorough exploration before any action is taken on them.

Lack of Problem Statement

The hallmark of a good institution-wide recommendation is a clear and concise statement of the issue it seeks to address. The Final Report is full of recommendations that, without stating the problem that is to be solved, ask for new roles that already seem to exist (2.1, 3.1, 4.3), or seem to be pushing ICANN into the realm of policing DNS protocols (19). This is a serious concern with recommendations that, once accepted by the Board, would create duplicative work, or even seem to expand ICANN's remit.

Concluding Comments

Thank you for the opportunity to comment.