

**SSR2 Pending - Likely to be Rejected Recommendations  
Clarifying Questions for Implementation Shepherds  
17 February 2022**

On 22 July 2021, the Board took action on the 63 SSR2 recommendations as issued in the [SSR2 Review Team Final Report](#), as noted within the [Scorecard titled "Final SSR2 Review Team Recommendations – Board Action."](#)

The Board directed the ICANN President and CEO, or his designee(s), to provide to the Board relevant information, as requested in the Scorecard, or periodic updates on progress toward gathering relevant information, starting within six months from this Board action, in order to support further Board action on each recommendation. The Board commits to take further action on these recommendations subsequent to the completion of steps as identified in the Scorecard.

This document addresses seven of the 34 pending recommendations, specifically six placed into the pending category, likely to be rejected and one pending further clarification

We are requesting that the SSR2 Implementation Shepherds respond to the clarifying questions for each of the following recommendations.

For context on each of the recommendations we have provided the seven SSR2 RT Final recommendations with Defined Measures of Success, Board Action and Board Rationale addressing the need for clarifying questions.

Questions directed to the SSR2 Implementation Shepherds are noted below the Board Rationale section for each recommendation.

SSR2 Recommendation	SSR2-Defined Measures of Success	Board Action
<b>Recommendations the Board determines to be pending, likely to be rejected once further information is gathered to enable approval</b>		
<p><b>6.1:</b> ICANN org should proactively promote the voluntary adoption of SSR best practices and objectives for vulnerability disclosure by the contracted parties. If voluntary measures prove insufficient to achieve the adoption of such best practices and objectives, ICANN org should implement the best practices and objectives in contracts, agreements, and MOUs.</p> <p><b>SSR2 designated priority:</b> High</p> <p><b>SSR2 designated owner:</b> ICANN org</p>	<p><b>SSR2-defined measures of success for Recommendation 6: SSR Vulnerability Disclosure and Transparency (6.1 - 6.2):</b> This recommendation can be considered implemented when ICANN org promotes the voluntary adoption of SSR best practices for vulnerability disclosures by contracted parties and implements associated vulnerability disclosure reporting. These recommendations can be considered effective when ICANN org and the contracted parties have adopted SSR best practices and objectives for vulnerability disclosure.</p>	<p>The Board notes that several elements of the recommendation are not clear. For example, as written, it is not clear how ICANN org should implement the recommendation in the event that there is not voluntary adoption, and may require a GNSO Policy Development Process. Possibly, the SSR2 Review Team meant “ICANN org should require the implementation of best practices and objectives in contracts, agreements, and Memorandums of Understanding (MOUs)”. If this is the intent, while the Board supports contracted parties using best practices that align with the goals and objectives outlined in ICANN’s Strategic Plan, making implementation of best practices mandatory would be a policy matter and not something ICANN org or Board can unilaterally impose in “contracts, agreements, and MOUs.” Other elements of this recommendation that require clarification include, for example, how should SSR best practices/objectives be identified? How should ICANN org measure adoption? What is the threshold to evaluate ICANN org’s promotional efforts as insufficient? The Board directs the ICANN President and CEO, or his designee(s), to seek clarity from the Implementation Shepherds on elements of this recommendation that are not clear, such as those noted above. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board’s decision on next steps.</p>
<p><b>6.2:</b> ICANN org should implement coordinated vulnerability disclosure reporting. Disclosures and information regarding SSR-related</p>	<p>The Board notes there are three components of this recommendation, which each have different considerations. While ICANN org already does some of</p>	<p>The Board notes there are three components of this recommendation, which each have different considerations. While ICANN org already does some of</p>

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issues, such as breaches at any contracted party and in cases of critical vulnerabilities discovered and reported to ICANN org, should be communicated promptly to trusted and relevant parties (e.g., those affected or required to fix the given issue). ICANN org should regularly report on vulnerabilities (at least annually), including anonymized metrics and using responsible disclosure.

the things called for within the recommendation as ICANN org noted in its [comments](#) on the SSR2 Review Team draft report, the recommendation's focus on disclosure appears difficult or nearly impossible to implement. The Board directs the ICANN President and CEO, or his designee(s), to consult with the SSR2 Implementation Shepherds to better understand the SSR2 Review Team's intent of the recommendation and the possible process to implement it with the relevant parties. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board's decision on next steps.

**Board Rationale:**

Recommendations 6.1 and 6.2 pertain to SSR vulnerability disclosures, including imposing additional requirements on contracted parties. The community inputs that the Board considered when acting on Recommendations 6.1 and 6.2 showed that while several commenters support the recommendations, others express concerns. [RySG](#), [Namecheap](#), and [RrSG](#) believe elements of the recommendations contemplate that ICANN org should unilaterally make modifications to the Registrar Accreditation Agreement (RAA). For example:

- [RySG](#) - "While the RySG supports its members adopting vulnerability disclosure policies as good business practice, it does not support ICANN acting as a clearinghouse, gatekeeper, or regulator of vulnerability disclosure policies
- [Namecheap](#) - "Namecheap does not support any of the components of the SSR2 Final Report that contemplate any modification of the RAA (including but not limited to Recommendations 6 and 8), and urges the ICANN Board to completely reject any of these recommendations."
- [RrSG](#) - "It is not the role of ICANN or the ICANN community to dictate the operational obligations of contractual parties especially without the participation, agreement, and approval of the contracted parties."

While [IPC](#) is supportive of these recommendations, IPC expresses a concern that "requir[ing] dotBrands to disclose all vulnerabilities in their business to ICANN...goes beyond ICANN's remit. At a minimum, any vulnerabilities should be limited only to those systems directly related to the operation of the TLD."

With regard to Recommendation 6.1, the Board notes that several elements of the recommendation are not clear. For example, as written, it is not clear how ICANN org should implement the recommendation in the event that there is not voluntary adoption, and may require a GNSO Policy Development Process. Possibly, the SSR2 Review Team meant "ICANN org should require the implementation of best practices and objectives in contracts, agreements, and Memorandums of Understanding". If this is the intent, while the Board supports contracted parties using best practices that align with the goals and objectives outlined in ICANN's Strategic Plan, making implementation of best practices mandatory would be a policy matter and not something ICANN org or Board can unilaterally impose in "contracts, agreements, and MOUs." Other elements of this recommendation that require clarification include, for example, how should SSR best practices/objectives be identified? How should ICANN org measure adoption? What is the threshold to evaluate ICANN org's promotional efforts as insufficient? The Board directs the ICANN President and CEO, or his designee(s), to seek clarity from the Implementation Shepherds on elements of this recommendation that are not clear, such as those noted above. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board's decision on next steps.

With regard to Recommendation 6.2, the Board notes there are three components of this recommendation, which each have different considerations. While ICANN org already does some of the things called for within the recommendation as ICANN org noted in its [comments](#) on the SSR2 Review Team draft report, the recommendation's focus on disclosure appears difficult or nearly impossible to implement. The Board directs the ICANN President and CEO, or his designee(s), to consult with the SSR2 Implementation Shepherds to better understand the SSR2 Review Team's intent of the recommendation and the possible process to implement it with the relevant parties. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board's decision on next steps.

**Questions for Implementation Shepherds:**

6.1

- a. Is it the intent of SSR2 RT that ICANN org develop these resources for voluntary adoption or make use of already developed resources? If the latter, can the implementation shepherds provide references to those resources?
- b. How should adoption of the voluntary measures be measured?
- c. Who should determine whether the voluntary measures are sufficiently or insufficiently adopted?

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d. Assuming the statement "ICANN org should implement the best practices and objectives in contracts, agreements, and MOUs" should be interpreted to read "ICANN Org should require contracted parties to implement the best practices and objectives via contracts, agreements, and MOUs", is it the intent of the SSR2 RT for ICANN org to modify existing contracts, agreements, and MOUs to require this implementation or is the intent that future contracts, agreements, and MOUs include this requirement?

6.2

- a. What specific additional requirements does the SSR2 intend to be imposed regarding coordinated vulnerability disclosure reporting that is not already covered in the existing Coordinated Vulnerability Disclosure Reporting framework?  
(<https://www.icann.org/en/system/files/files/vulnerability-disclosure-05aug13-en.pdf>)
- b. Please provide examples of specific outcomes and/or benefits to relevant parties the SSR2 RT would expect.
- c. Please provide examples of other potential "SSR-related issues" besides breach that should be included in such reporting to ICANN, in accordance with the SSR2 RT's expectations for implementation of this recommendation.

SSR2 Recommendation	SSR2-Defined Measures of Success	Board Action
<b>Recommendations the Board determines to be pending, likely to be rejected once further information is gathered to enable approval</b>		
<p><b>7.4:</b> ICANN org should establish a new site for DR for all the systems owned by or under the ICANN org purview with the goal of replacing either the Los Angeles or Culpeper sites or adding a permanent third site. ICANN org should locate this site outside of the North American region and any United States territories. If ICANN org chooses to replace one of the existing sites, whichever site ICANN org replaces should not be closed until the organization has verified that the new site is fully operational and capable of handling DR of these systems for ICANN org.</p> <p><b>SSR2 designated priority:</b> Medium-High</p> <p><b>SSR2 designated owner:</b> ICANN org</p>	<p><b>SSR2-defined measures of success for Recommendation 7: Improve Business Continuity and Disaster Recovery Processes and Procedures (7.1 - 7.5):</b> This recommendation can be considered implemented when ICANN org's BC and DR plans and processes are thoroughly documented according to accepted industry standards, including regular audits that those processes are being followed, and when a non-U.S., non-North American site is operational. This recommendation can be considered effective when ICANN org can demonstrate how they can handle incidents that impact the whole U.S. or North America.</p>	<p>The Board does not have enough information to consider resource implications of implementing this recommendation versus the expected benefit. The Board notes that in its <a href="#">comment</a> on the SSR2 Review Team draft report, ICANN org asked the SSR2 Review Team to provide clear justification as to why it believes the benefits of a third disaster recovery site justifies the costs of such a site. While the recommendation states that the new site could replace "either the Los Angeles or Culpeper sites", the requested cost/benefit information is not provided in the SSR2 Review Team Final Report. Further, the Board notes Section 4.2 of the Internet Assigned Numbers Authority (IANA) Naming Function Contract that prohibits IANA operations outside of the United States, and as such, the Board understands that implementation of this recommendation as written is not currently feasible for some portions of the IANA functions. These restrictions could be removed through contract amendments if there were a desire to do so from the ICANN community, which would require community consultation and discussion. The Board directs the ICANN President and CEO, or his designee(s), to consult with the SSR2 Implementation Shepherds to better understand elements of this recommendation that are not feasible as written, or are not clear, including if the SSR2 Review Team considered the benefit versus cost considerations. The outcome of the engagement with the</p>

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		SSR2 Implementation Shepherds will inform the Board’s decision on next steps, which may include wider community consultation.
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**Board Rationale:**

Recommendation 7.4 asks ICANN org to “establish a new site for [Disaster Recovery] for all the systems owned by or under the ICANN org purview with the goal of replacing either the Los Angeles or Culpeper sites or adding a permanent third site. ICANN org should locate this site outside of the North American region and any United States territories.” The community inputs that the Board considered when acting on Recommendation 7.4 showed that, in general, commenters support the recommendation. However, [RrSG](#) notes “although the RrSG is generally supportive of this recommendation, it will defer to IANA regarding whether or not to create and maintain a KSK ceremony location outside of the United States.”

The Board does not have enough information to consider resource implications of implementing this recommendation versus the expected benefit. The Board notes that in its [comment](#) on the SSR2 Review Team draft report, ICANN org asked the SSR2 Review Team to provide clear justification as to why it believes the benefits of a third disaster recovery site justifies the costs of such a site. While the recommendation states that the new site could replace “either the Los Angeles or Culpeper sites”, the requested cost/benefit information is not provided in the SSR2 Review Team Final Report. Further, the Board notes Section 4.2 of the IANA Naming Function Contract <sup>1</sup> that prohibits IANA operations outside of the United States, and as such, the Board understands that implementation of this recommendation as written is not currently feasible for some portions of the IANA functions. These restrictions could be removed through contract amendments if there were a desire to do so from the ICANN community, which would require community consultation and discussion. The Board directs the ICANN President and CEO, or his designee(s), to consult with the SSR2 Implementation Shepherds to better understand elements of this recommendation that are not feasible as written, or are not clear, including if the SSR2 Review Team considered the benefit versus cost considerations. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board’s decision on next steps, which may include wider community consultation.

**Questions for Implementation Shepherds:**

**7.4**

- a. What would the Implementation Shepherds consider would be the likelihood of an incident that impacts the whole of the United States or North America?
- b. The recommendation mentions Culpeper. Culpeper is only used as a KSK facility. ICANN has 2 KSK facilities; Culpeper and El Segundo. ICANN has corporate data center locations elsewhere in DC and LA separate from KSK facilities. Does this recommendation mean the locations where the corporate infrastructure is located? Or the separate locations that house the KSK/IANA infrastructure?
- c. The majority of ICANN org corporate services (payroll, finance, DMS, CMS, email, meeting services, etc.) are provided by third parties. Given that the majority of these outsourced services make up the backbone of business operations for ICANN org, can the implementation shepherds please clarify why having an additional DR site outside of U.S. territory provides enough of an added benefit to justify the additional cost?

<sup>1</sup> 2 IANA Naming Function Contract (30 September 2016) Section 4.2 U.S. Presence: [https://www.icann.org/iana\\_pti\\_docs/151-iana-naming-function-contract-v-30sep16](https://www.icann.org/iana_pti_docs/151-iana-naming-function-contract-v-30sep16)

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<b>Recommendations the Board determines to be pending, likely to be rejected once further information is gathered to enable approval</b>		
<p><b>9.2:</b> ICANN org should proactively monitor and enforce registry and registrar contractual obligations to improve the accuracy of registration data. This monitoring and enforcement should include the validation of address fields and conducting periodic audits of the accuracy of registration data. ICANN org should focus their enforcement efforts on those registrars and registries that have been the subject of over 50 complaints or reports per year regarding their inclusion of inaccurate data to ICANN org.</p> <p><b>SSR2 designated priority:</b> High</p> <p><b>SSR2 designated owner:</b> ICANN org</p>	<p><b>SSR2-defined measures of success for Recommendation 9: Monitor and Enforce Compliance (9.1 - 9.4):</b> This recommendation can be considered implemented when audits are happening regularly, and summaries published. This recommendation can be considered effective when ICANN org has completed an audit successfully and reported out to the community.</p>	<p>The Board notes that ICANN org does not have authority to require validation beyond what is in the Registry Agreement and Registrar Accreditation Agreement. The Board directs the ICANN President and CEO, or his designee(s) to consult with SSR2 Implementation Shepherds to better understand how the SSR2 Review Team anticipated that ICANN org’s Contractual Compliance team can perform the requested actions, including the authority the SSR2 Review Team understood that ICANN org’s Contractual Compliance team has to carry out the recommended actions. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board’s decision on next steps.</p>
<p><b>Board Rationale:</b>  Recommendation 9.2 recommends ICANN org “proactively monitor and enforce registry and registrar contractual obligations to improve the accuracy of registration data.” The Board notes that ICANN org does not have authority to require validation beyond what is in the Registry Agreement and Registrar Accreditation Agreement. The Board directs the ICANN President and CEO, or his designee(s) to consult with SSR2 Implementation Shepherds to better understand how the SSR2 Review Team anticipated that ICANN org’s Contractual Compliance team can perform the requested actions, including the authority the SSR2 Review Team understood that ICANN org’s Contractual Compliance team has to carry out the recommended actions. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board’s decision on next steps.</p>		
<p><b>Questions for Implementation Shepherds:</b></p> <p><b>9.2</b></p> <ol style="list-style-type: none"> <li>a. Compliance enforces RAA obligations related to accuracy of registration data (see <a href="#">[LINK]</a> with WHOIS inaccuracy metrics). Please clarify what this recommendation seeks from Compliance beyond what the function currently performs in this area?</li> <li>b. For actions that are not included in the current RAA, please explain how the SSR2 Implementation Shepherds believe Compliance can perform these actions, including the authority it believes Compliance has to carry out these actions.</li> </ol>		

SSR2 Recommendation	SSR2-Defined Measures of Success	Board Action
<b>Recommendations the Board determines to be pending, likely to be rejected once further information is gathered to enable approval</b>		
<p><b>16.2:</b> ICANN org should create specialized groups within the contract compliance function that understand privacy requirements and principles (such as collection limitation, data qualification, purpose specification, and security safeguards for disclosure) and that can facilitate law enforcement needs under the RDS framework as that framework is amended and adopted by the community (see also SSR2</p>	<p><b>SR2-defined measures of success for Recommendation 16: Privacy Requirements and RDS (16.1 - 16.3):</b> This recommendation can be considered implemented when ICANN org’s actions regarding privacy and their management of the RDS are properly documented, and specifically assigned resources within ICANN org keep the organization in line with current best practices and legal requirements in this space.</p>	<p>The Board is not clear as to what is meant by “facilitate law enforcement needs” and how that is relevant to the role of ICANN org’s Contractual Compliance team. As written, ICANN org does not have the authority to do this. Further, the intent of the recommendation is not clear, specifically why the SSR2 Review Team understands the existing subject matter experts and Chief Data Protection Officer roles within ICANN org are inadequate to achieve the requirements of this recommendation. The Board understands that ICANN org’s Contractual Compliance</p>

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<p>Recommendation 11: Resolve CZDS Data Access Problems).</p> <p><b>SSR2 designated priority:</b> Medium</p> <p><b>SSR2 designated owner:</b> ICANN org</p>	<p>This recommendation can be considered effective when ICANN org can demonstrate ongoing compliance with best practices and legal requirements in data handling and privacy.</p>	<p>team has subject matter experts in the areas listed to the extent that they are necessary for contract enforcement. For other matters and as necessary, ICANN org’s Contractual Compliance members can refer to ICANN org’s Chief Data Protection Officer for guidance regarding the specific areas listed. Through the Contractual Compliance team, ICANN org enforces policies that have been adopted by the community and makes operational and structural changes as needed to carry out its enforcement role. The Board directs the ICANN President and CEO, or his designee(s), to consult with SSR2 Implementation Shepherds to better understand how the SSR2 Review Team anticipated that ICANN org’s Contractual Compliance team can perform the requested actions, as well as other elements of the recommendation that are not clear, such as those noted above. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board’s decision on next steps.</p>
<p><b>16.3:</b> ICANN org should conduct periodic audits of adherence to privacy policies implemented by registrars to ensure that they have procedures in place to address privacy breaches.</p> <p><b>SSR2 designated priority:</b> Medium</p> <p><b>SSR2 designated owner:</b> ICANN org</p>		<p>The Board noted in its <a href="#">comment</a> on the SSR2 Review Team draft report, ICANN org does not specifically require registrars to have “privacy policies.” ICANN org’s Contractual Compliance team cannot audit something that is not an ICANN contractual requirement. The Board directs the ICANN President and CEO, or his designee(s) to consult with SSR2 Implementation Shepherds to better understand the SSR2 Review Team’s intent of the recommendation. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board’s decision on next steps.</p>
<p><b>Board Rationale:</b></p> <p>Recommendations 16.2 and 16.3 relate to privacy requirements around the Registration Directory Service (RDS). The community inputs that the Board considered when acting on Recommendations 16.2 and 16.3 showed that while several community groups support the recommendations, <a href="#">RySG</a> and <a href="#">RrSG</a> express some concerns that these recommendations do not address a specific problem statement. Concerns in particular with regard to recommendation 16.3 include, for example:</p> <ul style="list-style-type: none"> <li>- <a href="#">RySG</a> - “16.3 suggests that ICANN Compliance should audit Registry and Registrar compliance with a Registry or Registrar’s own internal policies and procedures as opposed to its contractual obligations with ICANN. Such a recommendation exceeds the scope of ICANN Compliance’s role to enforce contractual requirements.”</li> <li>- <a href="#">RrSG</a> - “This is outside of ICANN’s scope. ICANN is not a DPA, and the audit would need to cover a number of countries and jurisdictions around the world, and it is unclear how ICANN has the expertise or resources to conduct such an audit.”</li> </ul> <p>With regard to Recommendation 16.2, the Board is not clear as to what is meant by “facilitate law enforcement needs” and how that is relevant to the role of ICANN org’s Contractual Compliance team. As written, ICANN org does not have the authority to do this. Further, the intent of the recommendation is not clear, specifically why the SSR2 Review Team understands the existing subject matter experts and Chief Data Protection Officer roles within ICANN org are inadequate to achieve the requirements of this recommendation. The Board understands that ICANN org’s Contractual Compliance team has subject matter experts in the areas listed to the extent that they are necessary for contract enforcement. For other matters and as necessary, ICANN org’s Contractual Compliance members can refer to ICANN org’s Chief Data Protection Officer for guidance regarding the specific areas listed. Through the Contractual Compliance team, ICANN org enforces policies that have been adopted by the community and makes operational and structural changes as needed to carry out its enforcement role.</p> <p>The Board directs the ICANN President and CEO, or his designee(s), to consult with SSR2 Implementation Shepherds to better understand how the SSR2 Review Team anticipated that ICANN org’s Contractual Compliance team can</p>		

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perform the requested actions, as well as other elements of the recommendation that are not clear, such as those noted above. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board's decision on next steps.

Further, with regard to Recommendation 16.3 which recommends for ICANN org to “conduct periodic audits of adherence to privacy policies implemented by registrars to ensure that they have procedures in place to address privacy breaches”; as the Board noted in its [comment](#) on the SSR2 Review Team draft report, ICANN org does not specifically require registrars to have “privacy policies.” ICANN org’s Contractual Compliance team cannot audit something that is not an ICANN contractual requirement. The Board directs the ICANN President and CEO, or his designee(s) to consult with SSR2 Implementation Shepherds to better understand the SSR2 Review Team’s intent of the recommendation. The outcome of the engagement with the SSR2 Implementation Shepherds will inform the Board’s decision on next steps.

**Questions for Implementation Shepherds:**

16.2

- a. Please clarify the purpose the RT identified for the creation of specialised groups within Compliance that understands privacy requirements and principles?
- b. What kind of role would these groups play? Is the RT suggesting that these new groups should be responsible for enforcement of non-ICANN mandated policies that Contracted Parties might choose to apply to their operations?
- c. Please describe any current deficiencies the RT identified in enforcement of the RA/RAA privacy requirements.

16.3

- a. Please explain how the SSR2 Implementation Shepherds believe ICANN Compliance can perform audits of privacy policies adopted by registrars outside the requirements of the RAA and community-developed policy, including the authority it believes Compliance has to carry out these actions.

SSR2 Recommendation	SSR2-Defined Measures of Success	Board Action
<b>Recommendations the Board determines to be pending, further clarification</b>		
<p><b>20.1:</b> ICANN org should establish a formal procedure, supported by a formal process modeling tool and language to specify the details of future key rollovers, including decision points, exception legs, the full control-flow, etc. Verification of the key rollover process should include posting the programmatic procedure (e.g., program, finite-state machine (FSM)) for public comment, and ICANN org should incorporate community feedback. The process should have empirically verifiable acceptance criteria at each stage, which should be fulfilled for the process to continue. This process should be reassessed at least as often as the rollover itself (i.e., the same periodicity) so that ICANN org can use the lessons learned to adjust the process.</p> <p><b>SSR2 designated priority:</b> Medium</p> <p><b>SSR2 designated owner:</b> ICANN org</p>	<p><b>SSR2-defined measures of success for Recommendation 20: Formal Procedures for Key Rollovers (20.1 - 20.2):</b> This recommendation can be considered implemented when ICANN org develops formal process and verification that offers verification of the key rollover process after each key rollover, and when ICANN org begins to run regular tabletop exercises to test and familiarize participants with the key rollover process. This recommendation can be considered effective when the SSR of the process by which DNSSEC protections are maintained during root zone KSK key rollovers are formally verifiable.</p>	<p>The Board expects that this recommendation would require significant resources to implement, while the cost versus benefit is not clear. Further, the Board notes that this recommendation has dependencies on research work that has not yet been conducted, such as algorithm rolls. The Board notes that alternative solutions, such as a process that contains evaluation checkpoints that allow circumstances to be evaluated and provide for potential course correction, may be more appropriate. In light of these considerations, the Board requires further information, including from community engagement as appropriate, in order to take dispositive action on this recommendation. The Board directs the ICANN President and CEO, or his designee(s) to gather further information, including via community engagement and engagement with the SSR2 Implementation Shepherds as appropriate on this recommendation. This information will inform the Board’s decision on next steps.</p>
<b>Board Rationale:</b>		

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Recommendation 20.1 relates to establishing a formal procedure to specify the details of future key rollovers. No community groups express concerns about this recommendation. The Board expects that this recommendation would require significant resources to implement, while the cost versus benefit is not clear. Further, the Board notes that this recommendation has dependencies on research work that has not yet been conducted, such as algorithm rolls. The Board notes that alternative solutions, such as a process that contains evaluation checkpoints that allow circumstances to be evaluated and provide for potential course correction, may be more appropriate. In light of these considerations, the Board requires further information, including from community engagement as appropriate, in order to take dispositive action on this recommendation.

The Board directs the ICANN President and CEO, or his designee(s) to gather further information, including via community engagement and engagement with the SSR2 Implementation Shepherds as appropriate on this recommendation. This information will inform the Board's decision on next steps.

**Questions for Implementation Shepherds:**

20.1

- a. ICANN org has a small internal team that conducts this type of work and there are also many unknowns about the research level (e.g. what an algorithm roll would entail; whether an 'empirically verifiable' business process is accomplishable). Because of this, ICaNN org proposes that it would be more realistic and practical to have a process that contains evaluation checkpoints that allow circumstances to be assessed and provide for a potential course correction. Would the RT find this acceptable?