Subject: Business Constituency (BC) comment on Recommendations for ICANN's Root Name Service Strategy and Implementation

Date: Tuesday, December 8, 2020 at 5:41:02 PM Eastern Standard Time

From: Steve DelBianco

To: comments-root-name-service-implementation-27oct20@icann.org

CC: BC List

Below and attached is the comment of ICANN's Business Constituency (BC) regarding Recommendations for ICANN's Root Name Service Strategy and Implementation.

The BC commends ICANN's Office of the Chief Technology Officer (OCTO) on studies generated so far, and supports the continuation of these research projects, preferably published in all UN languages.

The recommendations came at a time when more users and businesses are depending upon the Internet to conduct their activities, significantly increasing the load on the existing Root Server System (RSS) infrastructure. Placing Root Server Instances in diverse locations is a great strategy to handle increasing load and provide more resilience in areas where Internet adoption is growing – mostly via mobile.

We recognize that the so-called Internet of Things (IoT) is still in its infancy, and we are yet to envision what the consequences of its deployment will truly look like once 5G networks and compatible devices are installed in a significant way. However, we observe their potential destructive power against the DNS in the hands of rogue actors, and this paints a troubling picture. ICANN Org should have presence in associations and groups related to IoT device manufacture to advance security by design, ensuring the DNS' continued protection.

To keep pace with the evolving threat landscape, we favor overprovisioning and erring on the side of caution, instead of potentially exposing businesses who are members of the BC to disruptions that could result in significant losses and security risks. The BC will publicly support expenditures made in this direction.

ICANN Org should support with funds and capability the placement of ICANN Managed Root Server (IMRS) single instances in geographic areas where it is required but not feasible due to financial and/or knowledge restrictions. This will help build capability in these areas leading to innovation and more support for the RSS infrastructure.

We support additional research into monitoring and how it would be performed, but request that a stream in the research should focus on the cost associated with the development, deployment and maintenance of these monitoring systems and the relative benefit to the operations of the RSS infrastructure in the long run.

The BC agrees with the strategy of encouraging hyperlocal deployment, and recommends that ICANN Org makes full use of its community's resources in sourcing local partners, such as ISPs, considering that they are working day-to-day with these actors. It would be a desirable gesture for ICANN Org to directly seek this kind of input, fostering stronger cooperation between both sides. The work of the regional managers should also be galvanized as the pandemic starts to wane. We further recommend a higher level of promotion, publicity and collaboration for the deployment of DNSSEC to tackle the

integrity exposure of Root zone data.

We would also like to see OCTO further pursue studies on the potential of IMRS Cloud, for us to fully grasp how implementation of these solutions could further ensure the Internet is technically stable, secure and reliable. We signal this a priority in terms of upcoming research. We would also like to better understand what are the opportunities to streamline the ICANN root zone encryption system with new technologies.

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This comment was drafted by Mark Datysgeld, Jimson Olufuye, and Vivek Goyal.
It was approved in accord with our Charter.

Steve DelBianco
Vice Chair for Policy Coordination
ICANN Business Constituency (BC)