

To the Members of the Board of Directors
Internet Corporation for Assigned Names and Numbers
<insert contact detail>

Dear Board Members,

On behalf of the Internet Society, I am writing to express this organization's concern about recent developments in ICANN pertaining to the security and stability of the Internet. The Internet Society shares the global community's desire to preserve and improve security and stability for everyone who uses the Internet. However, in our view, any effort to improve security and stability must be based on substantiated facts and careful planning. During the Nairobi ICANN meeting, statements were made that the Internet is under attack as never before; yet the facts to substantiate that statement have not yet been made available to the community.

Many recognized experts in DNS security and operators of key Internet infrastructure are on record saying they do not agree that the Internet is under attack in any new way, or that the DNS or the Internet itself are likely to collapse at any moment. The Internet Society believes that it is always important for the community to work together through established institutions, each within its mandate, to maintain and improve security and stability.

In the context of its expressed concern for DNS security, ICANN has recently tabled two proposals to create a DNS CERT capability. No doubt, vigilance is an important part of the community's efforts, as are capacity building efforts. The Internet Society has reviewed the ICANN proposals, and has concluded that the idea of establishing a DNS CERT is not harmful, and may possibly be helpful. That said we have strong concerns about how the proposals have been developed and their path going forward. As with all important initiatives concerning the functioning of the Internet, the Internet Society believes it is vital to rely on the Internet model to get the best result. By the Internet model, we mean relying on open, bottom-up, freely accessible, public, multi-stakeholder processes for both technology and policy development.

While we agree that the security and stability of the Internet are vitally important, we are concerned that the current proposals do not show convincingly that there has been a full analysis of alternate approaches. ISOC believes they may have been developed prematurely – before they were worked sufficiently with the supporting organizations and advisory committees in ICANN, and with the broader community, including the technical community such as the Internet Engineering Task Force (IETF) and the Internet Architecture Board (IAB) [IETF/IAB AGREEMENT WITH THIS TEXT TO BE CONFIRMED]. Specifically, there are many institutional, national and regional experts in security and stability, including those from existing

CERTs, who are not regular participants in ICANN processes. More open engagement with the widest possible community might lead, for example, to the conclusion that it would be better to create DNS CERT capacity at the national and regional levels and to bring CERT participants up to the same level of competence to deal with threats as they arise.

For that reason, ISOC strongly recommends that the “Proposed Strategic Initiatives for Improved DNS Security, Stability and Resiliency (SSR)” and the plan to create a global DNS-CERT be held back while ICANN staff reach out to the global community of experts to ensure that everyone interested has the opportunity to review and contribute to developing the proposals based on their experience and knowledge.

The Internet Society is pleased to offer these comments in the spirit of continued cooperation and collaboration. We remain committed to supporting ICANN as we work together to carry out our public service responsibilities.

Sincerely yours,

Lynn St Amour
President and Chief Executive Officer
Internet Society