

Summary Report of Public Comment Proceeding

Draft Final Report of the RSSAC2 Review			
Publication Date:	15 June 2018		
Prepared By:	Jennifer Bryce		
Public Comment Proceeding		Important Information Links	
Open Date:	1 May 2018		
Close Date:	10 June 2018		
Staff Report Due Date:	22 June 2018		
Staff Contact:	Lars Hoffmann	Email:	lars.hoffmann@icann.org
Section I: General Overview and Next Steps			
<p>On 1 May 2018, Interisle, the independent examiner conducting the second review of the ICANN Root Server System Advisory Committee (RSSAC) published its draft final report for public comment.</p> <p>Eight comments were submitted to the public comment forum – two from individuals and six from organizations. This summary and analysis does not present the complete feedback process, nor does it present all comments. It identifies sentiments broadly expressed by the community in response to Interisle’s draft final report.</p> <p>Next Steps</p> <p>Interisle will consider all comments and feedback in preparing its final report, expected to be published in July 2018. The Organizational Effectiveness Committee of the ICANN Board (OEC) will consider the final report along with the Feasibility Assessment and Initial Implementation Plan (FAIIP), which will reflect the view of the RSSAC Review Working Party on the recommendations contained in the final report. The OEC will consult relevant documentation and issue its recommendation for action to the ICANN Board. Following Board action on the final report and the FAIIP, planning for implementation will begin.</p>			

Section II: Contributors

At the time this report was prepared, a total of eight (8) community submissions had been posted to the forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
gTLD Registries Stakeholder Group	Paul Diaz	RySG
Business Constituency	Steve DelBianco	BC
At-Large Advisory Committee	ICANN At-Large Staff	ALAC
Root Server System Advisory Committee	Carlos Reyes	RSSAC
Non-Commercial Stakeholders Group	Rafik Dammak	NCSG
Registrar Stakeholder Group	Zoe Bonython	RrSG

Individuals:

Name	Affiliation (if provided)	Initials
Mohit Batra		MB
Alan Greenberg		AG

Section III: Summary of Comments

General Disclaimer: *This section intends to summarize broadly and comprehensively the comments submitted to this public comment proceeding but does not address every specific position stated by each contributor. The preparer recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).*

The draft final report contains forty-two (42) findings and six (6) primary recommendations supplemented by suggested ways in which the recommendations might be achieved.

The public comment forum received eight (8) submissions, generally falling into the following categories:

- Overall comment or overview statement
- Statement of agreement/support, or disagreement/opposition to a recommendation
- Suggestions and new ideas for improvement of the report or RSSAC

Section IV: Analysis of Comments

General Disclaimer: This section intends to provide an analysis and evaluation of the comments submitted along with explanations regarding the basis for any recommendations provided within the analysis.

In general, the community welcomes the proposed recommendations included in the report, particularly those recommendations pertaining to modifying RSSAC membership criteria.

However, the RSSAC notes that it has concerns about the scope of the report and believes several recommendations (2a, 3b, 3c, 6, 6b and 6c) are out of scope of the review. The RSSAC believes the report “fails to comment on the efficacy of the RSSAC as an advisory committee” and “concentrates much of its effort on how the RSSAC is perceived, rather than on how well it functions.”

An analysis of comments by recommendation is provided below.

Analysis of Comments by Recommendation

Recommendation 1: Modify the RSSAC membership criteria to allow the RSSAC to recruit a variety of skills, perspectives, and interests that include but are not limited to those available from the root server operator organizations.

The BC and the NCSG note support for this recommendation.

While the ALAC supports the intent of the recommendation, it suggests Interisle should consider altering the recommendation “to allow forms other than ‘membership’ while achieving the same aim of ensuring that the RSSAC has all of the skills and perspectives to properly fulfill its function.”

The RrSG notes its concerns with the current RSSAC membership model and requests that the report specifically “include a recommendation for RSSAC to open their membership to GNSO and ccNSO representatives in order to increase and better their understanding of, and communication with, the wider ICANN community.”

Recommendation 1a: Extend RSSAC membership by invitation to any qualified person.

The RSSAC comments that the report “dismisses the RSSAC Caucus in the discussion about this recommendation”, emphasizing that the RSSAC “regularly seeks input from the RSSAC Caucus about potential work items.”

Recommendation 1b: Let individual RSOs decide whether or not to participate in the RSSAC.

The NCSG “encourage[s] RSSAC to be committed to a system that is accountable and transparent as to enable all RSOs to willingly participate. By doing this, we would have a diverse RSSAC that would represent and appropriately advise ICANN [on issues pertaining] to the root server system.”

The RSSAC comments that it “does not understand the premise of [recommendation 1b]” as the report “offers little evidence to back up claims that some RSOs would rather not participate.” Further, the RSSAC notes that it perceives “very engaged participation from all RSOs in its meetings and workshops.”

Recommendation 2: Resolve the apparent mismatch between the charter and operational procedures of the RSSAC and the requirements and expectations of the ICANN Board and Community for interaction with the root server system.

The BC requests that this recommendation be prioritized, noting it is “highly concerned [as established in the report] that RSSAC does not consider itself accountable to ICANN Board and Community.”

The ALAC supports the notion that the “current chasm [identified in the recommendation] must be bridged” but notes that “simply lowering expectations does not address the issue.”

The RSSAC comments that the report should “provide more evidence of the ‘expectations of the ICANN Board and community for interaction with the root server system’ and identify what kind of interaction is expected.”

Recommendation 2a: Document the rationale for the architecture of the root server system.

The RSSAC believes this recommendation is out of scope for the review.

Recommendation 3: Formalize the responsibilities of the RSSAC to the ICANN Board and Community in a work plan that is periodically reviewed and published; and hold the RSSAC accountable for work plan deliverables.

The RSSAC welcomes this recommendation.

Recommendation 3a: Engage in ongoing threat assessment and risk analysis of the Root Server System and recommend any necessary audit activity to assess the current status of root servers and the root zone.

The RSSAC welcomes this recommendation but notes that “if there is an assertion that the RSSAC is not doing [the recommended activities] presently, the assertion is neither made nor supported with evidence.”

Recommendation 3b: Coordinate the gathering and publishing of meaningful data about the root server system.

The RSSAC believes this recommendation is out of scope for the review.

Recommendation 3c: Assess and report on the status of compliance with the recommendations of RSSAC001.

RSSAC believes this recommendation, “specifically, RSO compliance with RSSAC advice”, is out of scope for the review.

Recommendation 4. Develop and implement a leadership training and succession plan.

The RSSAC welcomes this recommendation.

Recommendation 5: Engage more actively with the rest of ICANN and its Community.

The ALAC and the BC support this recommendation. The BC specifically notes that “a renewed RSSAC should establish a community-facing outreach programme as a measure of its transparency and accountability to the community.”

The RSSAC welcomes this recommendation but notes that it “believes its engagement is generally appropriate given its charter and role as an advisory committee.”

Recommendation 6: Clarify the role and responsibility of the RSSAC with respect to other groups with adjacent or overlapping remits, including the SSAC, the RZERC, and the RSSAC Caucus.

As a general comment, AG notes his concern for the “multiple references [in the report] to the confusion between the RZERC and several other bodies.”

The RSSAC believes that “clarification of the roles of the RSSAC, RZERC, and SSAC is not something the RSSAC alone can address...Though potentially valuable, comparing the charters of RSSAC, RZERC, and SSAC is out of scope for this organizational review.”

Recommendation 6a: Develop a more effective and transparent process for defining RSSAC Caucus projects, engaging its members and managing its membership, managing its work, and promoting its output.

The RSSAC notes that it “recognizes the importance of developing the projects, engagement, management, and output of the RSSAC Caucus and regularly seeks input from it about potential work items.”

Recommendation 6b: In cooperation with the SSAC, develop and publish a statement that clearly distinguishes the roles and responsibilities of the RSSAC and the SSAC, describes how they are complementary with respect to their shared interests in security and stability, and establishes a framework for collaboration on issues of mutual concern.

The RSSAC believes this recommendation is out of scope.

Recommendation 6c: In cooperation with the RZERC and the SSAC, develop and publish a statement that clearly distinguishes the roles and responsibilities of the RSSAC, the RZERC, and the SSAC with respect to the evolution of the DNS root system (within the scope of ICANN’s mission).

The RSSAC believes this recommendation is out of scope.

Summary of Additional Comments

MB suggests a number of additional topics that could be addressed in the report, such as alternative DNS roots, the root zone key signing key rollover and the impact of disruptive

technologies on the Domain Name System. MB also proposes a recommendation be added to the report regarding exit interviews for outgoing RSSAC chairs.

The RySG notes that although it does not wish to comment on individual findings and recommendations due to the current bandwidth limitations of its members, as a general comment it believes “efforts to increase transparency and awareness of RSSAC’s role and activities are valuable.”

The BC notes it’s concern that there is “a persistent legacy of distrust of ICANN by some of [RSSAC’s] members.” The BC believes “this might be connected with the void created by the non-replacement of the NTIA oversight role after the transition” and comments that “this gap should urgently be addressed in the interest of the Internet Community and the need to build confidence on that critical Internet infrastructure.”

The RSSAC comments that “this organizational review, which utilizes closed-door interviews and unattributed quotations, does not uphold the core value of transparency. Overall, this organizational review provides very little evidence for its assertions and claims.”

Further, the RSSAC believes that “issues of perception and communication need to be addressed differently from issues of substance, and this organizational review does not distinguish between them in the recommendations.”

The NCSG notes that “the perception that RSSAC is a closed and secretive group does not speak well for the whole ICANN as this is an image representing ICANN to the stability of the root server system. The NCSG considers this a priority and should be a matter of urgency considering the impact this might have on the operation of RSSAC and other stakeholders to the root server system.”