SAC071

SSAC Comments on Cross Community Working Group Proposal on ICANN Accountability Enhancements

A Comment from the ICANN Security and Stability Advisory Committee (SSAC)
08 June 2015

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Preface

This is a Comment to the Cross Community Working Group on ICANN Accountability Enhancements from the ICANN Security and Stability Advisory Committee (SSAC) on the Proposal (Work Stream 1).[1]

The SSAC focuses on matters relating to the security and integrity of the Internet's naming and address allocation systems. This includes operational matters (e.g., pertaining to the correct and reliable operation of the root zone publication system), administrative matters (e.g., pertaining to address allocation and Internet number assignment), and registration matters (e.g., pertaining to registry and registrar services). SSAC engages in ongoing threat assessment and risk analysis of the Internet naming and address allocation services to assess where the principal threats to stability and security lie, and advises the ICANN community accordingly. The SSAC has no authority to regulate, enforce, or adjudicate. Those functions belong to other parties, and the advice offered here should be evaluated on its merits.

A list of the contributors to this Comment, references to SSAC members' biographies and disclosures of interest, and individual SSAC members' withdrawals and dissents with respect to the findings or recommendations in this Comment are at the end of this document.

[1] See: https://www.icann.org/en/system/files/files/cwg-accountability-draft-proposal-without-annexes-04may15-en.pdf.

1 Introduction

The Security and Stability Advisory Committee (SSAC) welcomes the opportunity to comment on the Cross Community Working Group (CCWG) Proposal on ICANN Accountability Enhancements (Work Stream 1) in the Public Comment forum that opened on 04 May 2015 and originally was scheduled to close on 03 June 2015.[2]

2 SSAC Comments

In Section 5.1.2 of the Proposal, "Influence in the Community Mechanism," the CCWG notes that it considered three mechanisms for allocating votes to Supporting Organizations (SOs) and Advisory Committees (ACs), and that the "Reference Mechanism" was the "most supported approach." The Reference Mechanism allocates 5 votes to every AC and SO except SSAC and RSSAC, which are allocated 2 votes each.

The CCWG provides the following rationale for preferring the Reference Mechanism to the two alternatives that it considered:

> b. The reasons to allocate a lower number of "votes" to SSAC in the Reference Mechanism is that it is a specific construct within ICANN designed to provide expertise on security and stability, rather than a group representing a community of stakeholders.

At the end of Section 5.1.2, the CCWG asks:

> What guidance, if any, would you provide to the CCWG–Accountability regarding the proposed options related to the relative influence of the various groups in the community mechanism? Please provide the underlying rationale in terms of required accountability features or protection against certain contingencies.

The SSAC has no comment at this time on the rationale for the Reference Mechanism, but makes the following observation and request concerning the role of the SSAC in any proposed new structure. According to its Charter, the role of the SSAC is to "advise the ICANN community and Board on matters relating to the security and integrity of the Internet's naming and address allocation systems."[3] The SSAC has neither been given nor sought any standing for its advice other than that it be evaluated on its merits and adopted (or not) according to that evaluation by the affected parties. The SSAC believes that this purely advisory role is the one to which it is best suited, and asks the CCWG–Accountability to take this into account in its review of the options described in Section 5.1.2.

The SSAC has no comment at this time on whether or not a legal structure is required or desirable to compel ICANN and the Board to respond to the SSAC's advice. However,

[2] See: https://www.icann.org/public-comments/ccwg-accountability-draft-proposal-2015-05-04-en and https://www.icann.org/en/system/files/files/cwg-accountability-draft-proposal-without-annexes-04may15-en.pdf.

[3] See: https://www.icann.org/groups/ssac/charter.

the SSAC is concerned about the way in which the proposed new SO/AC Membership Model might affect the way in which the SSAC operates, considering its narrow focus on security and stability matters and its reluctance to become involved in issues outside that remit. The SSAC expects that the community will adopt an organizational structure that recognizes the role and importance of high–quality expert advice on security and stability.

The SSAC notes the relatively short time available for consideration of the draft proposal, driven by a timeline set by external events such as the expiration of the contract between NTIA and ICANN related to IANA. Accordingly, the SSAC reserves the right to make additional comments as further details are developed.

3 Acknowledgments, Disclosures of Interest, Dissents, and Withdrawals

In the interest of transparency, these sections provide the reader with information about four aspects of the SSAC process. The Acknowledgments section lists the SSAC members, outside experts, and ICANN staff who contributed directly to this particular document. The Disclosures of Interest section points to the biographies of all SSAC members, which disclose any interests that might represent a conflict—real, apparent, or potential—with a member's participation in the preparation of this Report. The Dissents section provides a place for individual members to describe any disagreement that they may have with the content of this document or the process for preparing it. The Withdrawals section identifies individual members who have recused themselves from discussion of the topic with which this Report is concerned. Except for members listed in the Dissents and Withdrawals sections, this document has the consensus approval of all of the members of SSAC.

3.1 Acknowledgments

The committee wishes to thank the following SSAC members and external experts for their time, contributions, and review in producing this Advisory.

SSAC members

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3.2 Disclosures of Interest

SSAC member biographical information and Disclosures of Interest are available at: https://www.icann.org/resources/pages/biographies-2014-10-08-en.

3.3 Dissents

There were no dissents.

3.4 Withdrawals

There were no withdrawals.