



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

Mr. Patrick S. Kane
Senior Vice President
VeriSign Naming and Directory Services
12061 Bluemont Way
Reston, VA 20190

AUG 02 2013

Dear Mr. Kane:

I am writing in response to your letter of May 30, 2013, raising concerns related to the root zone system and the addition of new generic top-level domains (gTLDs). Through the Cooperative Agreement (*Agreement*) between the National Telecommunications and Information Administration (NTIA) and VeriSign, VeriSign serves as the Root Zone Maintainer, operator of the “A” Root Server, and registry operator for .com, all of which have, to date, been integral to ensure the stability and security of the domain name system (DNS). We are very surprised to receive your letter given your previous public statements, including the joint statement of the root zone partners last November that VeriSign was prepared to deploy new gTLDs into the root at the rate of at least 100 per week.

In response to your claims now that critical issues must be addressed before you are ready to implement the new gTLD program, you are no doubt aware that the Root Server Stability Advisory Committee (RSSAC) of the Internet Corporation for Assigned Names and Numbers (ICANN) is right now developing requirements of root server system monitoring, instrumentation, and management capabilities as well as the establishment of an early warning capability. The RSSAC has captured in RSSAC001 “*Service Expectations of Root Servers*,” a set of service expectations that root server operators must satisfy. In addition, through RSSAC002 “*RSSAC Recommendations on the measurement of the Root Server System*,” the RSSAC has developed the parameters for the basis of an early warning system that will assist in detecting and mitigating any effects (or the absence of such effects) that would challenge the scaling and/or working of the Internet's DNS root server system as a result of new gTLDs. NTIA understands these documents are in the final stages of approval and will be formally submitted to the ICANN Board in the coming weeks. Given Verisign's role as a key member of RSSAC, we expect and encourage your active participation and leadership in concluding this work in time for the launch of the new gTLD program within the time frame articulated by ICANN's senior management.

Within the last five years, ICANN, VeriSign and NTIA, working collaboratively, have made significant changes to the DNS root zone and the management systems. For instance, on June 16, 2010, an important milestone was achieved with the successful deployment of Domain Name System Security Extensions (DNSSEC). Furthermore, the deployment of the root zone management automation (RZM) system on July 21, 2011, and further enhancements made to the RZM system on May 16, 2013, improved the end-to-end process for root zone management. These changes entailed a certain risk to the stability of the DNS, but by working together, we

demonstrated that we could manage these risks and in fact, we implemented DNSSEC without any harm to the root zone.

The root zone partners have demonstrated their ability to mitigate the risks associated with executing an emergency change request with appropriate authorizations in an accelerated time frame. Therefore, the checks put in place today in the automated system, and the ability to exercise an emergency authorization to revert to previous root zone data for automation would be sufficient for the delegation of new gTLDs. If in the longer term, VeriSign believes an explicit policy and operational framework is needed to codify the halting of or rollback of delegations within the root, we would encourage you to pursue such an effort within the appropriate ICANN multistakeholder processes.

NTIA and VeriSign have historically had a strong working relationship, but inconsistencies in VeriSign's position in recent months are troubling. Given your obligations under the *Agreement*, NTIA fully expects VeriSign to process change requests when it receives an authorization to delegate a new gTLD. So that there will be no doubt on this point, please provide me written confirmation no later than August 16, 2013 that VeriSign will process changes requests for the new gTLD program when authorized to delegate a new gTLD.

Sincerely,

A handwritten signature in black ink, consisting of a stylized initial 'V' followed by a horizontal line extending to the right.

Vernita D. Harris

cc: Ms. Elise Gerich, Vice President, ICANN