

Registries Stakeholder Group Statement

Issue: Identifier Technology Health Indicators: Definition

Date statement submitted: 23 January, 2017

Reference URL: <https://www.icann.org/public-comments/ithi-definition-2016-11-29-en>

Background:

- The scope of the Identifier Technology Health Indicators (ITHI) initiative is all the Internet unique identifiers that ICANN helps coordinate, as outlined in the framework of the ICANN 2016-2020 Strategic Plan, Section 2.1 to “foster and coordinate a healthy, secure, stable, and resilient identifier ecosystem.”
- The goal of ITHI is to develop metrics to measure the health of the Internet's unique identifier system, to allow ICANN to track the evolution of the “State of the Identifier Technology”.
- In the current comment period ICANN asks feedback on the definition of health in the context of the ITHI and the description of five ‘diseases’ that could affect the health of the name part of the system of unique identifiers.
(the number community demanded to drive its own component of the ITHI project)

RySG Comment:

The Registries Stakeholder Group (RySG) is concerned by the publication of the Identifier Health Technology Indicators (ITHI) initiative’s proposal entitled “DNS Health: Free from Diseases” (“the proposal”). Our concerns with the report range from tactical to strategic and include:

- The proposal’s goals as they relate to ICANN’s limited mandate and scope;
- The proposal’s misdirected effort to address comments on the gTLD Marketplace Health Index;
- The lack of context around the initiative and the process by which the proposal is being brought forward;
- The likelihood that the proposal will confuse, rather than inform, its intended audience;
- The potential for overlap with other ongoing efforts both substantively and in the context of ongoing concerns around volunteer burnout; and
- The assumption that existing policy has no impact on the DNS Health.

These concerns taken altogether, we believe that the proposal introduces more issues than it solves. ICANN and community effort would be better spent by addressing feedback made on the gTLD Marketplace Health Index than continuing this work on a separate track.

The proposal alludes to activities that may be outside ICANN's mandate and scope

The RySG wants to flag that some of the issues addressed by the ITHI are outside ICANN's remit, confusing risks of the Internet as a whole with risks that are specific to the identifier ecosystem. The RySG asks ICANN not to continue the ITHI and to refine the scope of the strategic objective 2.1 of the ICANN 2016-2020 Strategic Plan to remove issues not in ICANN's remit. After this is done, ICANN could reassess whether a new project is still useful in order to accomplish the remaining goals of objective 2.1.

The proposal misdirects comments directed toward the gTLD Marketplace Health Index

The ITHI attributes its mission in part to the SAC-077 advice, which in fact responded to another ICANN initiative with a different scope: the gTLD Marketplace Health Index. It is unclear why ICANN addressed inputs received from the SSAC through this separate track rather than as part of the gTLD Marketplace Health Index. Further, it appears that other comments received on the gTLD Marketplace Health Index were similarly improperly considered. Specifically, we note that very few of the comments made by the RySG on the initial call for comments on the gTLD Marketplace Health Index were addressed in the published Beta version of the index. Overall, we urge ICANN to more seriously consider stakeholder input within a particular comment process.

The proposal is being brought forward in a top-down manner, and without sufficient context to allow meaningful comment

The Proposal was initially put forward to a subset of the community during a presentation during the ICANN 57 Public Meeting in Hyderabad. In this meeting, the slides were presented with additional context, as well as audience question and discussion. Clarifications referenced that the "risk factors" were not established root causes, but rather elements that could in theory exacerbate the issue. References made during the meeting to next steps suggested that the elements of the presentation would be reflected in a report, which would then be put out for community comment.

Rather than this approach, ICANN appears to just have published the presentation slides directly without incorporating any of the additional context, concerns, or comments raised during the session. Without this context, references to "Incompetent, complacent, or complicit behavior" of registries and registrars is highly accusatory. Those comments as well as statements regarding a lack of contractual enforcement by ICANN's compliance department are likely to be mischaracterized by the community. Similarly, definitional issues raised during the session persist; whereas one commenter pointed out that the mere "capability" to be used for spam, phishing, malware or other abuse could apply to any domain name and does not mean abuse will occur, the issue is altogether unaddressed in the published proposal.

The proposal is more likely to confuse than inform its intended audience

As several other commenters have noted, we believe that the use of lengthy and obscure Latin names to refer to potential issues is confusing and does not contribute to improving ecosystem health.

As a starting point, the forced analogy to medical conditions is misplaced; in common language the word health is also used to describe "*the condition of something that changes*

*or develops, such as an organization or system*¹ whereby *healthy* means ‘success’ or ‘working well’². The idea of being “free from illness or injury” makes sense in the medical context but carries no meaning when applied to the DNS.

The RySG sees no reason for developing a nomenclature for anomalies and threats to the health of the identifier ecosystem based on medical terminology (diseases, symptoms, patient, etc.). The fabricated disease-like names add no value and will not be understood if seen without the presentation slides. Beyond the names themselves the “diseases” that they aim to describe as well as their symptoms, causes, and their treatments are poorly defined, incomplete, and in some instances tautological.

Additionally, ICANN’s proposed definition of health excludes a number of metrics that can be used to measure overall health of the domain name ecosystem, including latency in registry data propagation (general system health), latency in DNS query responses (general system health), diversity of registration and resolution software implementations (resistance to and recovery from attack), and measurements of new gTLD acceptance, adoption, support, and usage.

Rather than expending time and resources to rename known issues, efforts related to domain abuse should endeavor to better observe trends that impact DNS health. Poor definitions can confuse the community and obscure actual trends related to industry health. ICANN vocabulary is already quite complex and should not be complicated further with newly invented idioms without proper justification or need.

The proposal may overlap with ongoing work on the gTLD Marketplace Health Initiative and, in doing so, contribute to ICANN volunteer burnout

The RySG is worried about the overlap of the ITHI with other initiatives in a time of volunteer burnout, particularly when efforts with highly similar mandates like the gTLD Marketplace Health Index already exist. At least three sessions have already been held that address the effort (during a DC Workshop, ICANN 57, and the M3AAWG meeting in Paris) and additional staff resources have been spent preparing this analogy without appetite from or benefit to the community. Considering the number of open policy streams, ICANN staff should more carefully prioritize work streams, particularly those that occur outside of community-initiated policy processes. Otherwise, it is likely to waste time and effort both on the part of staff and community volunteers.

The proposal ignores the potential impact of existing policy on the DNS Health

The proposal appears to be approaching the topic of health from an assumption that existing ICANN policies and requirements play no role in the development of symptoms or causes of an “unhealthy” DNS. The RySG believes that that assumption may well be incorrect.

One specific example can be found in the description of “Pain from Bad Data”. The descriptions of symptoms and causes make no mention of ICANN requirements that registrants associate Personally Identifiable Information (PII) with registered domain names

¹ Cambridge Dictionary, <http://dictionary.cambridge.org/dictionary/english/health>

² For example, the economic health of a nation. Collins Dictionary, <https://www.collinsdictionary.com/dictionary/english/health>

and that PII is made available to any and all users of the WHOIS service. It is likely that some of the so-called “bad data” is in fact an attempt by registrants to protect their personal privacy by deliberately submitting false information to registrars when registering a domain name. This practice may be in violation of current ICANN requirements, however, these requirements were developed absent a community developed consensus policy on the provision of WHOIS that balances potential benefits of publishing WHOIS data against the costs in terms of registrant privacy.