

# Registries Stakeholder Group Statement



## Public Comment: **Recommendations for Early Warning for Root Zone Scaling**

Date statement submitted: **23 November 2020**

Reference url:

<https://www.icann.org/public-comments/recommendations-early-warning-root-scaling-2020-10-05-en>

### Background<sup>1</sup>

- Document: **Recommendations for Early Warning for Root Zone Scaling**  
<https://www.icann.org/en/system/files/files/octo-015-01oct20-en.pdf>
- Purpose: seek input from the community on recommendations for early warning of issues that might arise from root zone scaling

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### Registries Stakeholder Group comment

The Registries Stakeholder Group (RySG) welcomes the opportunity to provide feedback on the Recommendations for Early Warning Root Zone Scaling and wishes to share the following comments:

The recommended approach with ICANN having periodic direct discussions with the groups that could be affected by root zone scaling issues, and the Root Server Operators (RSOs) and the IANA team having the possibility to report any scaling concerns at any time, seems reasonable.

However, the RySG notes that asking whether entities have “concerns” may be inviting subjective determinations based on perception, feelings or other intangible factors. The RySG notes the importance of reviewing and documenting the methodology and/or analysis that supports the RSOs evaluation to ensure transparency.

ICANN may consider documenting how the timelines of the proposed delayed indication of root zone degradation are sufficient to ensure that appropriate and narrowly tailored corrective action can be taken, and Registry Operators will not be at risk of having their DNS failing and thus the DNS to their customers failing and the entire Internet degrading, if not failing. Absent any extraordinary emergency circumstances, action should not be taken without giving the ICANN community a chance to provide comment and feedback, nor should actions inappropriately impede the delegation/redelegation of TLDs without proper evidence. While unlikely to occur, there is value in understanding and documenting risk.

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<sup>1</sup> *Background: intended to give a brief context for the comment and to highlight what is most relevant for RO's in the subject document – it is not a summary of the subject document.*