



**Comment on Draft Final  
Report of The Second  
Security and Stability  
Advisory Committee Review  
(SSAC2)**

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**Business Constituency Submission**

**GNSO//CSG//BC**

## Background

This document is the response of the ICANN Business Constituency (BC), from the perspective of business users and registrants. As defined in our Charter, the mission of the Business Constituency is to ensure that ICANN policy positions are consistent with the development of an Internet that:

1. promotes end-user confidence because it is a safe place to conduct business
2. is competitive in the supply of registry and registrar and related services
3. is technically stable, secure and reliable.

## Comment on Draft Final Report of The Second Security and Stability Advisory Committee Review (SSAC2)<sup>1</sup>

Per the ICANN bylaws (Section 4.4), this periodic organizational review of the SSAC examines:

“The purpose of the SSAC Review is to determine

- (i) whether the SSAC has a continuing purpose in the ICANN structure,
- (ii) if so, whether any change in structure or operations is desirable to improve its effectiveness and
- (iii) (iii) whether the SSAC is accountable to its constituencies, stakeholder groups, organizations and other stakeholders.”<sup>2</sup>

And the ICANN public comment page describes SSAC’s purpose this way:

“The SSAC advises the ICANN community and Board on matters relating to the security and integrity of the Internet’s naming and address allocation systems. This includes operational, administrative, and registration matters. 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.”<sup>3</sup>

The BC appreciates the opportunity to comment on the SSAC Review, Draft Final Report.

The BC agrees the role of SSAC is closely aligned to ICANNs Mission, and is a critical body to audit and inform ICANN effectiveness moving forward. The is particularly true in an age where the security and stability of the internet is under increasing scrutiny.

Regarding review criteria (i) “whether the SSAC has a continuing purpose”, we strongly agree SSAC has an important and continuing purpose within the ICANN structure.

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<sup>1</sup> See ICANN Public Comment page at <https://www.icann.org/public-comments/ssac-review-final-2018-10-15-en>

<sup>2</sup> ICANN Bylaws as of Jun-2018, at <https://www.icann.org/resources/pages/governance/bylaws-en>

<sup>3</sup> See ICANN Public Comment page at <https://www.icann.org/public-comments/ssac-review-final-2018-10-15-en>

Regarding review criteria (ii) “whether any change in structure or operations is desirable”, we believe the research done in this Review is fairly comprehensive and, except as noted below, we support the Recommendations to improve the SSAC’s effectiveness.

Regarding criteria (iii) “whether the SSAC is accountable”, we see the most room for improvement in the arena of communication, transparency and accountability to other ICANN stakeholders/groups.

Below, we describe more detailed reaction to the draft recommendations of this review. Unless indicated otherwise, the BC supports or is neutral to the Recommendations in the Review.

- The research would have been more comprehensive if there were more input from SO/ACs, especially certain ones that are less represented in the responses. This itself may be a reflection of current levels of engagement with SSAC, and may indicate room for improvement.
- The BC agrees with Finding 4 that SSAC advice is not acted upon in a timely manner, with SSAC 101 being a recent example where specific and actionable input was given in June and there has since been little indication what, if anything, ICANN may consider or implement.
- The BC strongly agrees with Recommendation 5 that SSAC should regularly review the implementation state of prior advice.
- The BC strongly agrees with Recommendation 8 which calls for an annual process to set short and medium term research priorities. This provides transparency to the SSAC agenda.
- The BC agrees with Finding 10 that SSAC should focus effort on increasing the interactions with other SO/AC groups. As such the BC strongly supports Recommendation 14 supporting the appointment of direct liaisons to other So/ACs, as well as Recommendations 14, 17 and 18 that would promote increased and timely communication and transparency to other SO/AC groups.
- The BC agrees with Finding 15 that the SSAC recruiting process seems informal and insular, and strongly recommends a more diligent and diverse recruiting process. Diversity of membership, experience, and opinion is important in all ICANN activities.
- Absent efforts to expand the membership of SSAC in line with the prior point above, the BC disagrees with Recommendation 27 on the point of term limits (or lack thereof) for non-leadership members. Because SSAC is **an invitation-only group**, we have some concern about how this could drive an insular nature to the group. Term limits are a great forcing function for refreshing membership, introducing new experiences and opinions and biasing members to action within the time limits of their membership.

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This comment was drafted by Tim Chen and edited by Steve DelBianco.  
It was approved in accord with our charter.