<table>
<thead>
<tr>
<th>Do you have any comments on the process of determining the issues and their presentation by the WGIG?</th>
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</thead>
<tbody>
<tr>
<td>The scoping of the papers is problematic because some mix fundamentally different issues in one paper while some issues are treated in several papers: Names and Numbers in one paper, Names and DNS treated extensively in many papers. A re-arrangement should be considered because it is likely to improve the final report. A clear separation of different issues is necessary; a clear and explicit analysis of those areas where issues could be treated together will help tremendously when considering governance options. Mixing issues a-priori will not be helpful. Maybe the interrelationships warrant their own paper.</td>
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<tr>
<td>It is also not clear what relationship the papers have to the final report of the WGIG. Please take comments on the papers also as comments towards the structuring of the final report.</td>
</tr>
<tr>
<td>For each paper you wish to comment on (Please repeat as many times as required)</td>
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<tr>
<td>Name of the paper: Administration of the Root Server System</td>
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<tr>
<td>Has the issue as it applies to the question of Internet Governance been adequately identified?</td>
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<tr>
<td>Comments: No.</td>
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<tr>
<td>The fundamental challenge from which all other issues are derived is:</td>
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<tr>
<td>“Maintain consensus about the administration and operation of one global DNS name space. Evolve administration and operation in-step with the evolution of the Internet itself and its environment.”</td>
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<td>The paper concentrates on the top of the DNS name space and mixes two issues: editing of the zone file and publishing of the file by the root server operators. Throughout the paper these functions are intermixed to the point that even an informed reader can easily be confused. It is important to separate these functions in the paper and to clearly identify the issues with each of them separately as well as those that apply to both. The paper is insufficiently linked to the administration and operation of the DNS below the top-level.</td>
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<tr>
<td>Does the paper cover the topic with sufficient depth and accuracy?</td>
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<tr>
<td>Comments: Partly.</td>
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<tr>
<td>The paper does an admirable job of describing the status quo and some of the history that led to it, based on a hierarchical and top-down view of governance. It neglects to describe and analyse the existing structures for policy development, accountability and operations that are organised in a distributed and/or bottom-up fashion.</td>
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<tr>
<td>The section on governance mechanisms is incomplete because it does not include the governance and accountability of each root name server operator in operational matters. Each root name server operator is responsible to the specific authority and governance mechanism under which it operates. I know of no root name server operators that currently accept any third-party authority over their operations.</td>
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<tr>
<td>The SWOT analysis has little connection to the first part of the paper. Each of the items in the SWOT analysis should refer to a clear description, such that a meaningful discussion can take place, in particular:</td>
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<tr>
<td>• The need, purpose and scope for a formal relationship between ICANN and the root name server operators is not analysed.</td>
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<tr>
<td>• “RSSAC is advisory” is too terse unless it refers to prior description and analysis.</td>
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<tr>
<td>• The relevance of “Errors in changes to the primary root server could be propagated …..” is unclear in this context.</td>
</tr>
</tbody>
</table>
Minor factual inaccuracies:

The “Root Servers Technical Operations Association” is not a formal organisation. It is an informal vehicle used by root name server operators to disseminate information and answer questions. Not all root name server operators participate actively.

The primary purpose of the “(Hidden) Distribution Master” is not to maintain a secure version of the root zone, but to provide a resilient distribution mechanism from the root zone editor to the root name server operators. To this end there are multiple instances of this server.

Does the paper achieve a reasonable balance in weighing relevant matters?

Comments: No.

This can only be achieved after all relevant matters are properly identified, described and analysed. While the paper represents a good start it has not completed this phase yet, so weighing cannot begin in a meaningful way.

Without identifying, describing and analysing the governance mechanisms of the lower parts of the global name space one cannot derive a working mechanism for the top of this name space. Focussing only on the top will not lead to working governance.

Any other comments

The substantial effort of the working group in producing this paper is acknowledged.

These comments are intended to be constructive and can be further explained and expanded upon request.

http://www.isoc.org/briefings/020/ contains substantial additional information that may be helpful in further developing those parts of the paper that are specific to the root name servers.