Director Voting Statement for Resolution 2018.09.16.11 Vote on Proceeding with KSK Rollover

16 September 2018 ICANN Board of Directors Meeting

Avri Doria

I will be voting no on the rollover at this time and was a dissenting voice in the Board Technical Committee.

I make this comment with the utmost respect for the work of OCTO in its preparations. Yet I still have concerns over stability and security with doing the rollover in October. I want to reiterate that I support the need to do the rollover of the key. And that we should not delay more than necessary.

Part of my concern stems from issues raised in the community comments for which I am uncertain as to whether we have adequate answers

Part, from concern over the dissent listed in the SSAC comment that was submitted at the request of the Board. I note that it is unfortunate that the SSAC report did not include a fulsome discussion of the issues seen by those dissenting, and that the Board never had the opportunity to speak to the dissenting SSAC members, some of the more respected technical experts in our industry.

While I understand the fact that we have now twice announced and that canceling again might result in further reputational loss.

I also understand that there is not an immediate need to roll the key though there is an overall urgency, and that if it does not go perfectly, we may a suffer greater reputation loss that would accompany any network breakage or security issue.

The risks that people have outlined in the community comments, while basically addressed by OCTO, need further analysis for me to be confident that we understand and are ready to mitigate.

While Internal studies and analysis have been done and are of course trustworthy, there is no external peer reviewed study to point to. This is a deficit that should have been dealt with.

The greatest risk is that out of the millions that will fail after the roll over, some that are serious and may even be critical, may occur; if this happens the lack of peer reviewed studies may be a liability for ICANN, perhaps not legal, but in terms of our reputation as protectors of the stability & security of internet system of names.

I am also uncertain about the degree of public notification of this and of the possible risks. Certainly work has been done, but I question whether it is enough to really have informed people globally of this flag day. Comparisons have been made to this being

similar to y2k, but in that case, there was no choice about the calendar rolling over and the public awareness was as complete as possible. In this case, we are afforded the opportunity to wait until we have studied the risks further and made as sure as sure can be that those running systems know and have taken the appropriate actions.

Additionally, while there is a set of mitigation methods that have been defined, I believe that the mitigation strategy is rather thin and could use more work; for example, it does not include any scenario studies.

As I know this is a minority vote, all I can say is that while I vote no, I do so with the hope that all my concerns are unwarranted and that everything will go perfectly without serious mishap.