

Models for a Governance Structure for the National Strategy for Trusted Identities in Cyberspace

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Submitted via Electronic Mail to: NSTICnoi@nist.gov [Microsoft Word Format]

Ms. Sokol:

The Go Daddy Group welcomes the opportunity to submit these comments on the governance structure for the National Strategy for Trusted Identities in Cyberspace (NSTIC). Our comments include, but are not limited to, the items listed below.

Go Daddy is the world's largest domain name registrar, with over 49 million domain names under management and 9.5 million customers. It is also the world's largest secure hosting provider, and the #1 provider of net-new SSL Certificates.

Throughout our growth, we have recognized the challenges of verifying an individual's identity online, and the implications this has on electronic commerce. We support the principles of NSTIC; that an online identity framework must be secure, interoperable, and voluntary, while enhancing the privacy of individuals, and that this effort should be led by the private sector. We further agree that the challenges of online identification cannot be solved entirely by technology development, and that industry, government, and standards bodies must cooperate to provide a comprehensive solution.

1. Structure

Many relevant examples of existing organizations were presented as possible models during the NSTIC workshop in Washington DC. In the domain name registration industry, we are highly familiar with ICANN (Internet Corporation for Assigned Names and Numbers), which is contracted by the Department of Commerce to administer the Domain Name System. Its management of the DNS is comparable in complexity to the steering group's administration of the proposed Identity Ecosystem. ICANN has defined its many constituents, and has structured itself to ensure balance in the participation of and interactions among the multiple stakeholders of DNS policy.

In many respects, however, ICANN falls short of the ideal model of a self-governing policy body. It often fails to conduct key deliberations in an open, transparent

manner, and has limited accountability to those affected by its decisions. And although some recent progress has been made, ICANN's relationship with governments is ambiguous. Finally, ICANN frequently exceeds its own mandate as a technical coordinating body, and entertains topics that involve content, economic competition, and consumer protection.

There are many functions that ICANN performs reasonably well and on which it could guide the development of the NSTIC governance structure. However, we note the numerous issues that the ICANN model has been unable to resolve, and would urge that these be addressed at the beginning of any new collaboration between government and industry.

2. Steering Group Initiation

During the NSTIC workshop in Washington DC, many ideas were proposed to "stand up" the Steering Group. Our position is that a transitional panel of expert advisors, drawn from a cross-section of anticipated stakeholders in the Identity Ecosystem, should be the first step in the process. The transitional panel would be led by NIST, with the objective of creating the "steady state" structure of the NSTIC steering group. The questions listed in Section 3 and Section 4 of this NOI could form the basis of a charter for the proposed transitional panel.

It is critical that this transitional panel not be comprised solely of, or dominated by, incumbent stakeholders. The success of NSTIC is dependent upon expanding the existing arena into the anticipated Identity Ecosystem, and this requires a new mix of expert participants.

Once the transitional panel has issued its recommendations, the NIST can take a reduced role in the "steady state," while remaining an active participant in the NSTIC steering group.

3. Stakeholder Representation and Economic Considerations

Because we support the two-phased stand up of the NSTIC steering group, we believe the questions outlined in Section 3 of the NOI form the basis of a charter for the transitional panel. This includes the composition of the steering group, and the development of a structure for balanced representation of all interests.

Section 3 also poses several questions involving the potential fee structure of the steering body. We recommend that the transitional panel commission a comprehensive study on how the economic model will evolve. We agree that the various stakeholders should not be "priced out" of the Identity Ecosystem. But similarly, there must be some minimum cost structure to prevent zero-fee competition that discourages participation and innovation from commercial stakeholders. Any proposed fee structure should allow the NSTIC steering group to become self-financing without continued support from the NIST budget.

4. International Coordination

Because we support the two-phases stand up of the NSTIC steering group, we believe the questions outlined in Section 4 of the NOI form the basis of a charter for the transitional panel. This includes the role of international governments and standards entities in the Identity Ecosystem, and the international portability of Identity Credentials.

We strongly believe this is a critical component to the success of NSTIC, and a significant benefit for commercial participants. The interoperability is key to preventing online identity issues from fragmenting along international borders, when the online economy no longer functions this way. The Identity Ecosystem must include both a means to validate US credentials on foreign networks, and facilities for the importation of trusted, non-US credentials into the NSTIC Identity Ecosystem.

Conclusion

The challenges associated with creating an online Identity Ecosystem are significant, but cannot be ignored if we hope to realize the full commercial potential of the Internet. The effort cannot be led exclusively by the existing Identity industry, because the problems cannot be solved by technology alone. Similarly, the effort cannot be led or funded exclusively by government, although government plays a critical role in standing up the long-term organization.

We are encouraged that these challenges are receiving significant attention within NIST and the existing Identity industry. Go Daddy will closely follow the development and implementation of NSTIC, and participate where we can make an appropriate contribution. We welcome any further dialogue with NIST on these issues.

Thank you,

Tim Ruiz
Vice President, Policy and Corporate Development