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Recommendations for DNS Privacy Service Operators
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Abstract

This document presents operational, policy and security considerations for DNS operators who choose to offer DNS Privacy services. With the recommendations, the operator can make deliberate decisions which services to provide, and how the decisions and alternatives impact the privacy of users.

This document also presents a framework to assist writers of DNS Privacy Policy and Practices Statements (analogous to DNS Security Extensions (DNSSEC) Policies and DNSSEC Practice Statements described in [[RFC6841](#)]).

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DNS Privacy Service Recommendations

July 2018

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[1.](#) Introduction

[NOTE: This document is submitted to the IETF for initial review and for feedback on the best forum for future versions of this document. Initial considerations for DoH [[I-D.ietf-doh-dns-over-https](#)] are included here in anticipation of that draft progressing to be an RFC but further analysis is required.]

The Domain Name System (DNS) is at the core of the Internet; almost every activity on the Internet starts with a DNS query (and often several). However the DNS was not originally designed with strong security or privacy mechanisms. A number of developments have taken

place in recent years which aim to increase the privacy of the DNS system and these are now seeing some deployment. This latest evolution of the DNS presents new challenges to operators and this document attempts to provide an overview of considerations for privacy focussed DNS services.

In recent years there has also been an increase in the availability of "open resolvers" [[I-D.ietf-dnsop-terminology-bis](#)] which users may prefer to use instead of the default network resolver because they offer a specific feature (e.g. good reachability, encrypted transport, strong privacy policy, filtering (or lack of), etc.). These open resolvers have tended to be at the forefront of adoption

of privacy related enhancements but it is anticipated that operators of other resolver services will follow.

Whilst protocols that encrypt DNS messages on the wire provide protection against certain attacks, the resolver operator still has (in principle) full visibility of the query data and transport identifiers for each user. Therefore, a trust relationship exists. The ability of the operator to provide a transparent, well documented, and secure privacy service will likely serve as a major differentiating factor for privacy conscious users if they make an active selection of which resolver to use.

It should also be noted that the choice of a user to configure a single resolver (or a fixed set of resolvers) and an encrypted transport to use in all network environments has both advantages and disadvantages. For example the user has a clear expectation of which resolvers have visibility of their query data however this resolver/transport selection may provide an added mechanism to track them as they move across network environments. Commitments from operators to minimize such tracking are also likely to play a role in users selection of resolver.

More recently the global legislative landscape with regard to personal data collection, retention, and pseudonymization has seen significant activity with differing requirements active in different jurisdictions. For example the user of a service and the service itself may be in jurisdictions with conflicting legislation. It is an untested area that simply using a DNS resolution service constitutes consent from the user for the operator to process their

query data. The impact of recent legislative changes on data pertaining to the users of both Internet Service Providers and DNS open resolvers is not fully understood at the time of writing.

This document has two main goals:

- o To provide operational and policy guidance related to DNS over encrypted transports and to outline recommendations for data handling for operators of DNS privacy services.
- o To introduce the DNS Privacy Policy and Practice Statement (DPPPS) and present a framework to assist writers of this document. A DPPPS is a document that an operator can publish outlining their operational practices and commitments with regard to privacy thereby providing a means for clients to evaluate the privacy properties of a given DNS privacy service. In particular, the framework identifies the elements that should be considered in formulating a DPPPS. This document does not, however, define a

particular Policy or Practice Statement, nor does it seek to provide legal advice or recommendations as to the contents.

Community insight [or judgment?] about operational practices can change quickly, and experience shows that a Best Current Practice (BCP) document about privacy and security is a point-in-time statement. Readers are advised to seek out any errata or updates that apply to this document.

[2.](#) Scope

"DNS Privacy Considerations" [[I-D.bortzmeyer-dprive-rfc7626-bis](#)] describes the general privacy issues and threats associated with the use of the DNS by Internet users and much of the threat analysis here is lifted from that document and from [[RFC6873](#)]. However this document is limited in scope to best practice considerations for the provision of DNS privacy services by servers (recursive resolvers) to clients (stub resolvers or forwarders). Privacy considerations specifically from the perspective of an end user, or those for operators of authoritative nameservers are out of scope.

This document includes (but is not limited to) considerations in the

following areas (taken from [[I-D.bortzmeyer-dprive-rfc7626-bis](#)]):

1. Data "on the wire" between a client and a server
2. Data "at rest" on a server (e.g. in logs)
3. Data "sent onwards" from the server (either on the wire or shared with a third party)

Whilst the issues raised here are targeted at those operators who choose to offer a DNS privacy service, considerations for areas 2 and 3 could equally apply to operators who only offer DNS over unencrypted transports but who would like to align with privacy best practice.

3. Privacy related documents

There are various documents that describe protocol changes that have the potential to either increase or decrease the privacy of the DNS. Note this does not imply that some documents are good or bad, better or worse, just that (for example) some features may bring functional benefits at the price of a reduction in privacy and conversely some features increase privacy with an accompanying increase in complexity. A selection of the most relevant documents are listed in [Appendix A](#) for reference.

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4. Terminology

The key words "MUST", "MUST NOT", "REQUIRED", "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", "RECOMMENDED", "NOT RECOMMENDED", "MAY", and "OPTIONAL" in this document are to be interpreted as described in [BCP 14](#) [[RFC2119](#)] [[RFC8174](#)] when, and only when, they appear in all capitals, as shown here.

Privacy terminology is as described in [Section 3 of \[RFC6973\]](#).

DNS terminology is as described in [[I-D.ietf-dnsop-terminology-bis](#)] with one modification: we use the definition of Privacy-enabling DNS server taken from [[RFC8310](#)]:

- o Privacy-enabling DNS server: A DNS server (most likely a full-

service resolver) that implements DNS-over-TLS [[RFC7858](#)], and may optionally implement DNS-over-DTLS [[RFC8094](#)]. The server should also offer at least one of the credentials described in [Section 8](#) and implement the (D)TLS profile described in [Section 9](#).

TODO: Update the definition of Privacy-enabling DNS server in [[I-D.ietf-dnsop-terminology-bis](#)] to be complete and also include DoH, then reference that here.

- o DPPPS: DNS Privacy Policy and Practice Statement, see [Section 6](#).
- o DNS privacy service: The service that is offered via a privacy-enabling DNS server and is documented either in an informal statement of policy and practice with regard to users privacy or a formal DPPPS.

[5](#). Recommendations for DNS privacy services

We describe three classes of actions that operators of DNS privacy services can take:

- o Threat mitigation for well understood and documented privacy threats to the users of the service and in some cases to the operators of the service.
- o Optimization of privacy services from an operational or management perspective
- o Additional options that could further enhance the privacy and usability of the service

This document does not specify policy only best practice, however for DNS Privacy services to be considered compliant with these best practice guidelines they SHOULD implement (where appropriate) all:

- o Threat mitigations to be minimally compliant
- o Optimizations to be moderately compliant

- o Additional options to be maximally compliant

TODD: Some of the threats listed in the following sections are taken directly from [Section 5 of RFC6973](#), some are just standalone descriptions, we need to go through all of them and see if we can use the [RFC6973](#) threats where possible and make them consistent.

[5.1.](#) On the wire between client and server

In this section we consider both data on the wire and the service provided to the client.

[5.1.1.](#) Transport recommendations

Threats:

- o Surveillance: Passive surveillance of traffic on the wire
- o Intrusion: Active injection of spurious data or traffic

Mitigations:

A DNS privacy service can mitigate these threats by providing service over one or more of the following transports

- o DNS-over-TLS [[RFC7858](#)]
- o DoH [[I-D.ietf-doh-dns-over-https](#)]

Additional options:

- o A DNS privacy service can also be provided over DNS-over-DTLS [[RFC8094](#)], however note that this is an Experimental specification.

It is noted that DNS privacy service might be provided over IPSec, DNSCrypt or VPNs. However, use of these transports for DNS are not standardized and any discussion of best practice for providing such service is out of scope for this document.

[5.1.2.](#) Authentication of DNS privacy services

Threats:

- o Surveillance and Intrusion: Active attacks that can redirect traffic to rogue servers

Mitigations:

DNS privacy services should ensure clients can authenticate the server. Note that this, in effect, commits the DNS privacy service to a public identity users will trust.

When using DNS-over-TLS clients that select a 'Strict Privacy' usage profile [[RFC8310](#)] (to mitigate the threat of active attack on the client) require the ability to authenticate the DNS server. To enable this, DNS privacy services that offer DNS-over-TLS should provide credentials in the form of either X.509 certificates, SPKI pinsets or TLSA records.

When offering DoH [[I-D.ietf-doh-dns-over-https](#)], HTTPS requires authentication of the server as part of the protocol.

Optimizations:

DNS privacy services can also consider the following capabilities/options:

- o As recommended in [[RFC8310](#)] providing DANE TLSA records for the nameserver
 - * In particular, the service could provide TLSA records such that authenticating solely via the PKIX infrastructure can be avoided.
- o Implementing [[I-D.ietf-tls-dnssec-chain-extension](#)]
 - * This can decrease the latency of connection setup to the server and remove the need for the client to perform meta-queries to obtain and validate the DANE records.

[5.1.2.1](#). Certificate management

Anecdotal evidence to date highlights the management of certificates as one of the more challenging aspects for operators of traditional DNS resolvers that choose to additionally provide a DNS privacy service as management of such credentials is new to those DNS operators.

It is noted that SPKI pinset management is described in [[RFC7858](#)] but that key pinning mechanisms in general have fallen out of favour operationally for various reasons.

Threats:

- o Invalid certificates, resulting in an unavailable service.
- o Mis-identification of a server by a client e.g. typos in URLs or authentication domain names

Mitigations:

It is recommended that operators:

- o Choose a short, memorable authentication name for their service
- o Automate the generation and publication of certificates
- o Monitor certificates to prevent accidental expiration of certificates

TODO: Could we provide references for certificate management best practice, for example [Section 6.5 of RFC7525](#)?

[5.1.3](#). Protocol recommendations

[5.1.3.1](#). DNS-over-TLS

Threats:

- o Known attacks on TLS (TODO: add a reference)
- o Traffic analysis (TODO: add a reference)
- o Potential for client tracking via transport identifiers
- o Blocking of well known ports (e.g. 853 for DNS-over-TLS)

Mitigations:

In the case of DNS-over-TLS, TLS profiles from [Section 9](#) and the Countermeasures to DNS Traffic Analysis from [section 11.1 of \[RFC8310\]\(#\)](#) provide strong mitigations. This includes but is not limited to:

- o Adhering to [[RFC7525](#)]

- o Implementing only (D)TLS 1.2 or later as specified in [[RFC8310](#)]
- o Implementing EDNS(0) Padding [[RFC7830](#)] using the guidelines in [[I-D.ietf-dprive-padding-policy](#)]
- o Clients should not be required to use TLS session resumption [[RFC5077](#)], Domain Name System (DNS) Cookies [[RFC7873](#)].
- o A DNS-over-TLS privacy service on both port 853 and 443. We note that this practice may require revision when DoH becomes more widely deployed, because of the potential use of the same ports for two incompatible types of service.

Optimizations:

- o Concurrent processing of pipelined queries, returning responses as soon as available, potentially out of order as specified in [[RFC7766](#)]. This is often called 'OOOR' - out-of-order responses. (Providing processing performance similar to HTTP multiplexing)
- o Management of TLS connections to optimize performance for clients using either
 - * [[RFC7766](#)] and EDNS(0) Keepalive [[RFC7828](#)] and/or
 - * DNS Stateful Operations [[I-D.ietf-dnsop-session-signal](#)]

Additional options that providers may consider:

- o Offer a .onion [[RFC7686](#)] service endpoint

[5.1.3.2](#). DoH

TODO: Fill this in, a lot of overlap with DNS-over-TLS but we need to address DoH specific ones if possible.

Mitigations:

- o Clients should not be required to use HTTP Cookies [[RFC6265](#)].

- o Clients should not be required to include any headers beyond the absolute minimum to obtain service from a DoH server.

[5.1.4.](#) Availability

Threats:

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- o A failed DNS privacy service could force the user to switch providers, fallback to cleartext or accept no DNS service for the outage.

Mitigations:

A DNS privacy service must be engineered for high availability. Particular care should to be taken to protect DNS privacy services against denial-of-service attacks, as experience has shown that unavailability of DNS resolving because of attacks is a significant motivation for users to switch services.

TODO: Add reference to ongoing research on this topic.

[5.1.5.](#) Service options

Threats:

- o Unfairly disadvantaging users of the privacy service with respect to the services available. This could force the user to switch providers, fallback to cleartext or accept no DNS service for the outage.

Mitigations:

A DNS privacy service should deliver the same level of service offered on un-encrypted channels in terms of such options as filtering (or lack of), DNSSEC validation, etc.

[5.1.6.](#) Limitations of using a pure TLS proxy

Optimization:

Some operators may choose to implement DNS-over-TLS using a TLS proxy (e.g. nginx [1], haproxy [2] or stunnel [3]) in front of a DNS nameserver because of proven robustness and capacity when handling large numbers of client connections, load balancing capabilities and good tooling. Currently, however, because such proxies typically have no specific handling of DNS as a protocol over TLS or DTLS using them can restrict traffic management at the proxy layer and at the DNS server. For example, all traffic received by a nameserver behind such a proxy will appear to originate from the proxy and DNS techniques such as ACLs, RRL or DNS64 will be hard or impossible to implement in the nameserver.

Operators may choose to use a DNS aware proxy such as dnstool.

[5.2.](#) Data at rest on the server

[5.2.1.](#) Data handling

Threats:

- o Surveillance
- o Stored data compromise
- o Correlation
- o Identification
- o Secondary use
- o Disclosure
- o Contravention of legal requirements not to process user data?

Mitigations:

The following are common activities for DNS service operators and in all cases should be minimized or completely avoided if possible for DNS privacy services. If data is retained it should be encrypted and

either aggregated, pseudonymized or anonymized whenever possible. In general the principle of data minimization described in [[RFC6973](#)] should be applied.

- o Transient data (e.g. that is used for real time monitoring and threat analysis which might be held only memory) should be retained for the shortest possible period deemed operationally feasible.
- o The retention period of DNS traffic logs should be only those required to sustain operation of the service and, to the extent that such exists, meet regulatory requirements.
- o DNS privacy services should not track users except for the particular purpose of detecting and remedying technically malicious (e.g. DoS) or anomalous use of the service.
- o Data access should be minimized to only those personal who require access to perform operational duties.

[5.2.2.](#) Data minimization of network traffic

Data minimization refers to collecting, using, disclosing, and storing the minimal data necessary to perform a task, and this can be achieved by removing or obfuscating privacy-sensitive information in network traffic logs. This is typically personal data, or data that can be used to link a record to an individual, but may also include revealing other confidential information, for example on the structure of an internal corporate network.

The problem of effectively ensuring that DNS traffic logs contain no or minimal privacy-sensitive information is not one that currently has a generally agreed solution or any Standards to inform this discussion. This section presents an overview of current techniques to simply provide reference on the current status of this work.

Research into data minimization techniques (and particularly IP address pseudonymization/anonymization) was sparked in the late

1990s/early 2000s, partly driven by the desire to share significant corpuses of traffic captures for research purposes. Several techniques reflecting different requirements in this area and different performance/resource tradeoffs emerged over the course of the decade. Developments over the last decade have been both a blessing and a curse; the large increase in size between an IPv4 and an IPv6 address, for example, renders some techniques impractical, but also makes available a much larger amount of input entropy, the better to resist brute force re-identification attacks that have grown in practicality over the period.

Techniques employed may be broadly categorized as either anonymization or pseudonymization. The following discussion uses the definitions from [\[RFC6973\] Section 3](#), with additional observations from van Dijkhuizen et al. [\[4\]](#)

- o Anonymization. To enable anonymity of an individual, there must exist a set of individuals that appear to have the same attribute(s) as the individual. To the attacker or the observer, these individuals must appear indistinguishable from each other.
- o Pseudonymization. The true identity is deterministically replaced with an alternate identity (a pseudonym). When the pseudonymization schema is known, the process can be reversed, so the original identity becomes known again.

In practice there is a fine line between the two; for example, how to categorize a deterministic algorithm for data minimization of IP addresses that produces a group of pseudonyms for a single given address.

[5.2.3](#). IP address pseudonymization and anonymization methods

As [\[I-D.bortzmeyer-dprive-rfc7626-bis\]](#) makes clear, the big privacy risk in DNS is connecting DNS queries to an individual and the major vector for this in DNS traffic is the client IP address.

There is active discussion in the space of effective pseudonymization of IP addresses in DNS traffic logs, however there seems to be no single solution that is widely recognized as suitable for all or most use cases. There are also as yet no standards for this that are unencumbered by patents. This following table presents a high level

comparison of various techniques employed or under development today and classifies them according to categorization of technique and other properties. The list of techniques includes the main techniques in current use, but does not claim to be comprehensive. [Appendix B](#) provides a more detailed survey of these techniques and definitions for the categories and properties listed below.

Figure showing comparison of IP address techniques (SVG) [\[5\]](#)

The choice of which method to use for a particular application will depend on the requirements of that application and consideration of the threat analysis of the particular situation.

For example, a common goal is that distributed packet captures must be in an existing data format such as PCAP [\[pcap\]](#) or C-DNS [\[I-D.ietf-dnsop-dns-capture-format\]](#) that can be used as input to existing analysis tools. In that case, use of a Format-preserving technique is essential. This, though, is not cost-free - several authors (e.g. Brenker & Arnes [\[6\]](#)) have observed that, as the entropy in a IPv4 address is limited, given a de-identified log from a target, if an attacker is capable of ensuring packets are captured by the target and the attacker can send forged traffic with arbitrary source and destination addresses to that target, any format-preserving pseudonymization is vulnerable to an attack along the lines of a cryptographic chosen plaintext attack.

[5.2.4.](#) Pseudonymization, anonymization or discarding of other correlation data

Threats:

- o IP TTL/Hoplimit can be used to fingerprint client OS
- o Tracking of TCP sessions
- o Tracking of TLS sessions and session resumption mechanisms

- o Resolvers might receive client identifiers e.g. MAC addresses in EDNS(0) options - some CPE devices are known to add them.
- o HTTP headers

Mitigations:

- o Data minimization or discarding of such correlation data

TODO: More analysis here.

[5.2.5.](#) Cache snooping

Threats:

- o Profiling of client queries by malicious third parties

Mitigations:

TODO: Describe techniques to defend against cache snooping

[5.3.](#) Data sent onwards from the server

In this section we consider both data sent on the wire in upstream queries and data shared with third parties.

[5.3.1.](#) Protocol recommendations

Threats:

- o Transmission of identifying data upstream.

Mitigations:

As specified in [[RFC8310](#)] for DNS-over-TLS but applicable to any DNS Privacy services the server should:

- o Implement QNAME minimization [[RFC7816](#)]
- o Honour a SOURCE PREFIX-LENGTH set to 0 in a query containing the EDNS(0) Client Subnet (ECS) option and not send an ECS option in upstream queries.

Optimizations:

- o The server should either
 - * not use the ECS option in upstream queries at all, or

- * offer alternative services, one that sends ECS and one that does not.

If operators do offer a service that sends the ECS options upstream they should use the shortest prefix that is operationally feasible (NOTE: the authors believe they will be able to add a reference for advice here soon) and ideally use a policy of whitelisting upstream servers to send ECS to in order to minimize data leakage. Operators should make clear in any policy statement what prefix length they actually send and the specific policy used.

Additional options:

- o Aggressive Use of DNSSEC-Validated Cache [[RFC8198](#)] to reduce the number of queries to authoritative servers to increase privacy.
- o Run a copy of the root zone on loopback [[RFC7706](#)] to avoid making queries to the root servers that might leak information.

[5.3.2](#). Client query obfuscation

Additional options:

Since queries from recursive resolvers to authoritative servers are performed using cleartext (at the time of writing), resolver services need to consider the extent to which they may be directly leaking information about their client community via these upstream queries and what they can do to mitigate this further. Note, that even when all the relevant techniques described above are employed there may still be attacks possible, e.g. [[Pitfalls-of-DNS-Encryption](#)]. For example, a resolver with a very small community of users risks exposing data in this way and OUGHT obfuscate this traffic by mixing it with 'generated' traffic to make client characterization harder. The resolver could also employ aggressive pre-fetch techniques as a further measure to counter traffic analysis.

At the time of writing there are no standardized or widely recognized techniques to preform such obfuscation or bulk pre-fetches.

Another technique that particularly small operators may consider is forwarding local traffic to a larger resolver (with a privacy policy that aligns with their own practices) over an encrypted protocol so that the upstream queries are obfuscated among those of the large resolver.

[5.3.3.](#) Data sharing

Threats:

- o Surveillance
- o Stored data compromise
- o Correlation
- o Identification
- o Secondary use
- o Disclosure
- o Contravention of legal requirements not to process user data?

Mitigations:

Operators should not provide identifiable data to third-parties without explicit consent from clients (we take the stance here that simply using the resolution service itself does not constitute consent).

Even when consent is granted operators should employ data minimization techniques such as those described in [Section 5.2.1](#) if data is shared with third-parties.

Operators should consider including specific guidelines for the collection of aggregated and/or anonymized data for research purposes, within or outside of their own organization.

TODO: More on data for research vs operations... how to still motivate operators to share anonymized data?

TODO: Guidelines for when consent is granted?

TODO: Applies to server data handling too.. could operators offer alternatives services one that implies consent for data processing,

one that doesn't?

6. DNS privacy policy and practice statement

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6.1. Recommended contents of a DPPPS

1 Policy

1.1 Recommendations. This section should explain, with reference to section [Section 5](#) of this document which recommendations the DNS privacy service employs.

1.2 Data handling. This section should explain, with reference to section [Section 5.2](#) of this document the policy for gathering and disseminating information collected by the DNS privacy service.

1.2.1 Specify clearly what data (including whether it is aggregated, pseudonymized or anonymized) is:

1.2.1.1 Collected and retained by the operator (and for how long)

1.2.1.2 Shared with partners

1.2.1.3 Shared, sold or rented to third-parties

1.2.2 Specify any exceptions to the above, for example technically malicious or anomalous behaviour

1.2.3 Declare any partners, third-party affiliations or sources of funding

1.2.4 Whether user DNS data is correlated or combined with any other personal information held by the operator

2 Practice. This section should explain the current operational practices of the service.

2.1 Specify any temporary or permanent deviations from the policy for operational reasons

2.2 With reference to section [Section 5.1](#) provide specific details of which capabilities are provided on which address and ports

2.3 With reference to section [Section 5.3](#) provide specific details of which capabilities are employed for upstream traffic from the server

2.4 Specify the authentication name to be used (if any) and if TLSA records are published (including options used in the TLSA records)

2.5 Specify the SPKI pinsets to be used (if any) and policy for rolling keys

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2.6 Provide a contact email address for the service

[6.2.](#) Current policy and privacy statements

NOTE: An analysis of these statements will clearly only provide a snapshot at the time of writing. It is included in this version of the draft to provide a basis for the assessment of the contents of the DPPPS and is expected to be removed or substantially re-worked in a future version.

[6.2.1.](#) Quad9

UDP/TCP and TLS (port 853) service provided on two addresses:

- o 'Secure': 9.9.9.9, 149.112.112.112, 2620:fe::fe, 2620:fe::9
- o 'Unsecured': 9.9.9.10, 149.112.112.10, 2620:fe::10

Policy:

- o <<https://www.quad9.net/policy/>>
- o <<https://www.quad9.net/privacy/>>
- o <<https://www.quad9.net/faq/>>

[6.2.2.](#) Cloudflare

UDP/TCP and TLS (port 853) service provided on 1.1.1.1, 1.0.0.1, 2606:4700:4700::1111 and 2606:4700:4700::1001.

Policy:

- o <<https://developers.cloudflare.com/1.1.1.1/commitment-to-privacy/privacy-policy/privacy-policy/>>

DoH provided on: <<https://cloudflare-dns.com/dns-query>>

Policy:

- o <<https://developers.cloudflare.com/1.1.1.1/commitment-to-privacy/privacy-policy/firefox/>>

Tor endpoint: <<https://dns4torpnlfs2ifuz2s2yf3fc7rdmsbhm6rw75euj35pac6ap25zggad.onion>>.

[6.2.3.](#) Google

UDP/TCP service provided on 8.8.8.8, 8.8.4.4, 2001:4860:4860::8888 and 2001:4860:4860::8844.

Policy: <<https://developers.google.com/speed/public-dns/privacy>>

[6.2.4.](#) OpenDNS

UDP/TCP service provided on 208.67.222.222 and 208.67.220.220 (no IPv6).

We could find no specific privacy policy for the DNS resolution, only a general one from Cisco that seems focussed on websites.

Policy: <<https://www.cisco.com/c/en/us/about/legal/privacy-full.html>>

[6.2.5.](#) Comparison

The following tables provides a high-level comparison of the policy and practice statements above and also some observations of practice measured at dnsprivacy.org [7]. The data is not exhaustive and has not been reviewed or confirmed by the operators.

A question mark indicates no clear statement or data could be located on the issue. A dash indicates the category is not applicable to the service.

Table showing comparison of operators policies [8]

Table showing comparison of operators practices [9]

NOTE: Review and correction of any inaccuracies in the table would be much appreciated.

[6.3.](#) Enforcement/accountability

Transparency reports may help with building user trust that operators adhere to their policies and practices.

Independent monitoring should be performed where possible of:

- o ECS, QNAME minimization, EDNS(0) padding, etc.
- o Filtering
- o Uptime

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[7.](#) IANA considerations

None

[8.](#) Security considerations

TODO: e.g. New issues for DoS defence, server admin policies

[9.](#) Acknowledgements

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11. Changelog

[draft-dickinson-dprive-bcp-op-01](#)

- o Update reference to [RFC7626](#) to [draft-bortzmeyer-rfc7626-bis](#)
- o Fix a few typos

[draft-dickinson-dprive-bcp-op-00](#)

Name change to add dprive. Differences to [draft-dickinson-bcp-op-00](#):

- o Reworked the Terminology, Introduction and Scope

- o Added Document section
- o Reworked the Recommendations section to describe threat mitigations, optimizations and other options. Split the recommendations up into 3 subsections: on the wire, at rest and

upstream

- o Added much more information on data handling and IP address pseudonymization and anonymization
- o Added more details and comparison of some existing policy/privacy policies
- o Applied virtually all of Amelia Andersdotter's suggested changes.

[draft-dickinson-bcp-op-00](#)

- o Initial commit

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[12.1.](#) Normative References

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12.3. URIs

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- [3] <https://kb.isc.org/article/AA-01386/0/DNS-over-TLS.html>
- [4] <https://doi.org/10.1145/3182660>
- [5] https://github.com/Sinodun/draft-dprive-bcp-op/blob/master/draft-01/ip_techniques_table.svg
- [6] <https://pdfs.semanticscholar.org/7b34/12c951cebe71cd2cddac5fda164fb2138a44.pdf>
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- [10] <https://support.google.com/analytics/answer/2763052?hl=en>
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Appendix A. Documents

This section provides an overview of some DNS privacy related documents, however, this is neither an exhaustive list nor a definitive statement on the characteristic of the document.

A.1. Potential increases in DNS privacy

These documents are limited in scope to communications between stub clients and recursive resolvers:

- o 'Specification for DNS over Transport Layer Security (TLS)' [[RFC7858](#)], referred to here as 'DNS-over-TLS'.

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- o 'DNS over Datagram Transport Layer Security (DTLS)' [[RFC8094](#)], referred to here as 'DNS-over-DTLS'. Note that this document has the Category of Experimental.
- o 'DNS Queries over HTTPS (DoH)' [[I-D.ietf-doh-dns-over-https](#)] referred to here as DoH.
- o 'Usage Profiles for DNS over TLS and DNS over DTLS' [[RFC8310](#)]
- o 'The EDNS(0) Padding Option' [[RFC7830](#)] and 'Padding Policy for EDNS(0)' [[I-D.ietf-dprive-padding-policy](#)]

These documents apply to recursive to authoritative DNS but are relevant when considering the operation of a recursive server:

- o 'DNS Query Name minimization to Improve Privacy' [[RFC7816](#)] referred to here as 'QNAME minimization'

A.2. Potential decreases in DNS privacy

These documents relate to functionality that could provide increased

tracking of user activity as a side effect:

- o 'Client Subnet in DNS Queries' [[RFC7871](#)]
- o 'Domain Name System (DNS) Cookies' [[RFC7873](#)])
- o 'Transport Layer Security (TLS) Session Resumption without Server-Side State' [[RFC5077](#)] referred to here as simply TLS session resumption.
- o 'A DNS Packet Capture Format' [[I-D.ietf-dnsop-dns-capture-format](#)]
- o Passive DNS [[I-D.ietf-dnsop-terminology-bis](#)]

Note that depending on the specifics of the implementation [[I-D.ietf-doh-dns-over-https](#)] may also provide increased tracking.

[A.3.](#) Related operational documents

- o 'DNS Transport over TCP - Implementation Requirements' [[RFC7766](#)]
- o 'Operational requirements for DNS-over-TCP' [[I-D.ietf-dnsop-dns-tcp-requirements](#)]
- o 'The edns-tcp-keepalive EDNS0 Option' [[RFC7828](#)]
- o 'DNS Stateful Operations' [[I-D.ietf-dnsop-session-signal](#)]

[Appendix B.](#) IP address techniques

Data minimization methods may be categorized by the processing used and the properties of their outputs. The following builds on the categorization employed in [[RFC6235](#)]:

- o Format-preserving. Normally when encrypting, the original data length and patterns in the data should be hidden from an attacker. Some applications of de-identification, such as network capture de-identification, require that the de-identified data is of the same form as the original data, to allow the data to be parsed in the same way as the original.
- o Prefix preservation. Values such as IP addresses and MAC

addresses contain prefix information that can be valuable in analysis, e.g. manufacturer ID in MAC addresses, subnet in IP addresses. Prefix preservation ensures that prefixes are de-identified consistently; e.g. if two IP addresses are from the same subnet, a prefix preserving de-identification will ensure that their de-identified counterparts will also share a subnet. Prefix preservation may be fixed (i.e. based on a user selected prefix length identified in advance to be preserved) or general.

- o Replacement. A one-to-one replacement of a field to a new value of the same type, for example using a regular expression.
- o Filtering. Removing (and thus truncating) or replacing data in a field. Field data can be overwritten, often with zeros, either partially (grey marking) or completely (black marking).
- o Generalization. Data is replaced by more general data with reduced specificity. One example would be to replace all TCP/UDP port numbers with one of two fixed values indicating whether the original port was ephemeral (≥ 1024) or non-ephemeral (> 1024). Another example, precision degradation, reduces the accuracy of e.g. a numeric value or a timestamp.
- o Enumeration. With data from a well-ordered set, replace the first data item data using a random initial value and then allocate ordered values for subsequent data items. When used with timestamp data, this preserves ordering but loses precision and distance.
- o Reordering/shuffling. Preserving the original data, but rearranging its order, often in a random manner.
- o Random substitution. As replacement, but using randomly generated replacement values.

- o Cryptographic permutation. Using a permutation function, such as a hash function or cryptographic block cipher, to generate a replacement de-identified value.

B.1. Google Analytics non-prefix filtering

Since May 2010, Google Analytics has provided a facility [[10](#)] that

allows website owners to request that all their users IP addresses are anonymized within Google Analytics processing. This very basic anonymization simply sets to zero the least significant 8 bits of IPv4 addresses, and the least significant 80 bits of IPv6 addresses. The level of anonymization this produces is perhaps questionable. There are some analysis results [11] which suggest that the impact of this on reducing the accuracy of determining the user's location from their IP address is less than might be hoped; the average discrepancy in identification of the user city for UK users is no more than 17%.

Anonymization: Format-preserving, Filtering (grey marking).

[B.2.](#) dnswasher

Since 2006, PowerDNS have included a de-identification tool dnswasher [12] with their PowerDNS product. This is a PCAP filter that performs a one-to-one mapping of end user IP addresses with an anonymized address. A table of user IP addresses and their de-identified counterparts is kept; the first IPv4 user addresses is translated to 0.0.0.1, the second to 0.0.0.2 and so on. The de-identified address therefore depends on the order that addresses arrive in the input, and running over a large amount of data the address translation tables can grow to a significant size.

Anonymization: Format-preserving, Enumeration.

[B.3.](#) Prefix-preserving map

Used in TCPdpriv [13], this algorithm stores a set of original and anonymised IP address pairs. When a new IP address arrives, it is compared with previous addresses to determine the longest prefix match. The new address is anonymized by using the same prefix, with the remainder of the address anonymized with a random value. The use of a random value means that TCPdpriv is not deterministic; different anonymized values will be generated on each run. The need to store previous addresses means that TCPdpriv has significant and unbounded memory requirements, and because of the need to allocated anonymized addresses sequentially cannot be used in parallel processing.

Anonymization: Format-preserving, prefix preservation (general).

[B.4.](#) Cryptographic Prefix-Preserving Pseudonymisation

Cryptographic prefix-preserving pseudonymisation was originally proposed as an improvement to the prefix-preserving map implemented in TCPdpriv, described in Xu et al. [14] and implemented in the Crypto-PAN tool [15]. Crypto-PAN is now frequently used as an acronym for the algorithm. Initially it was described for IPv4 addresses only; extension for IPv6 addresses was proposed in Harvan & Schoenwaelder [16] and implemented in snmpdump. This uses a cryptographic algorithm rather than a random value, and thus pseudonymity is determined uniquely by the encryption key, and is deterministic. It requires a separate AES encryption for each output bit, so has a non-trivial calculation overhead. This can be mitigated to some extent (for IPv4, at least) by pre-calculating results for some number of prefix bits.

Pseudonymization: Format-preserving, prefix preservation (general).

[B.5.](#) Top-hash Subtree-replicated Anonymisation

Proposed in Ramaswamy & Wolf, Top-hash Subtree-replicated Anonymisation (TSA) originated in response to the requirement for faster processing than Crypto-PAN. It used hashing for the most significant byte of an IPv4 address, and a pre-calculated binary tree structure for the remainder of the address. To save memory space, replication is used within the tree structure, reducing the size of the pre-calculated structures to a few Mb for IPv4 addresses. Address pseudonymization is done via hash and table lookup, and so requires minimal computation. However, due to the much increased address space for IPv6, TSA is not memory efficient for IPv6.

Pseudonymization: Format-preserving, prefix preservation (general).

[B.6.](#) ipcipher

A recently-released proposal from PowerDNS [17], ipcipher [18] is a simple pseudonymization technique for IPv4 and IPv6 addresses. IPv6 addresses are encrypted directly with AES-128 using a key (which may be derived from a passphrase). IPv4 addresses are similarly encrypted, but using a recently proposed encryption ipcrypt [19] suitable for 32bit block lengths. However, the author of ipcrypt has since indicated [20] that it has low security, and further analysis has revealed it is vulnerable to attack.

Pseudonymization: Format-preserving, cryptographic permutation.

[B.7.](#) Bloom filters

van Rijswijk-Deij et al. [21] have recently described work using Bloom filters to categorize query traffic and record the traffic as the state of multiple filters. The goal of this work is to allow operators to identify so-called Indicators of Compromise (IOCs) originating from specific subnets without storing information about, or be able to monitor the DNS queries of an individual user. By using a Bloom filter, it is possible to determine with a high probability if, for example, a particular query was made, but the set of queries made cannot be recovered from the filter. Similarly, by mixing queries from a sufficient number of users in a single filter, it becomes practically impossible to determine if a particular user performed a particular query. Large numbers of queries can be tracked in a memory-efficient way. As filter status is stored, this approach cannot be used to regenerate traffic, and so cannot be used with tools used to process live traffic.

Anonymized: Generalization.

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