



18 April 2018

RE: Draft Project Plan for the Proposed Name Collision Analysis Project (NCAP)

Neustar welcomes the opportunity to comment on the draft project plan for the Proposed Name Collision Analysis Project (NCAP). Supporting innovation while ensuring a pragmatic and well-balanced approach to the security and integrity of the DNS are necessary for a healthy and growing Internet.

Existing Name Collision Management Framework

In preparation for any review of potential future risks of name collisions, it is imperative to review past efforts. As part of the groundwork for the last round of new TLD launches, multiple research projects were undertaken to identify the risk, and develop mitigations, for name collisions in the DNS. These efforts resulted in the development of the Name Collision Occurrence Management Framework, which can be found at the following link: <https://www.icann.org/en/system/files/files/name-collision-framework-30jul14-en.pdf>.

This framework comprised multiple measures that addressed the risk of name collisions in the previous new TLD round, including:

- An obligation for all Registry Operators to act on requests from ICANN within two hours in the case of name collision reports, in conjunction with Section 6.3 of Specification 6 of the new gTLD Registry Agreement. This included the removal of domain names from a TLD zone for a period of up to two years in the event of collisions.

New gTLD Registry Agreement, Specification 6

6.3 Name Collision Report Handling

6.3.1 During the first two years after delegation of the TLD, Registry Operator's emergency operations department shall be available to receive reports, relayed by ICANN, alleging demonstrably severe harm from collisions with overlapping use of the names outside of the authoritative DNS.

6.3.2 Registry Operator shall develop an internal process for handling in an expedited manner reports received pursuant to subsection 6.3.1 under which Registry Operator may, to the extent necessary and appropriate, remove a recently activated name from the TLD zone for a period of up to two years in order to allow the affected party to make changes to its systems.

- A 90 day continuous controlled interruption period, where wildcard records were used to resolve queries for any domain name within a TLD in a predefined manner. This approach allowed detection of name collisions with any domain name within a TLD as part of the TLD launch process. For TLDs that were already active, a controlled interruption period of 90 days for block list domains enabled detection of name collisions.
- An agreement that ICANN may designate an interim back-end Registry Operator in the event a Registry Operator is unable to implement the measures to address name collisions in a timely manner.
- An option to reverse the delegation of a TLD during the controlled interruption period, in the unlikely case of a clear and present danger to human life as a result of collision due to the use of a dotless name.

These measures, developed after considerable research and consultation with the community, supported the successful launch of more than 1200 new gTLDs. Based on the experience from the 2012 new gTLD round, these measures have been shown to provide effective mitigation of the risks of name collisions. To date, no major name collision event has occurred where a risk to human life has been observed.

The effectiveness of these measures was corroborated by a report by JAS Global Advisors, titled 'Mitigating the Risk of DNS Namespace Collisions - A Study on Namespace Collisions in the Global Internet DNS Namespace and a Framework for Risk Mitigation', published by ICANN in 2015.¹

Potential impact on new gTLDs

While Neustar support research and analysis projects such as the NCAP, we note that the project plan has three phases and currently has a suggested completion date of July 2020 with an assumption that if any policy work is required, it would be performed upon completion. Based on existing evidence such as the JAS report noted above we do not believe that the NCAP process should have any adverse impact on the current timeline for the introduction of the next wave of new gTLDs, which is anticipated in early 2020.

However, in order to mitigate the potential for any adverse impact, we recommend that the SSAC reconsider the NCAP project plan and timeline to take account of other community processes, such as the New gTLD Subsequent Procedures Policy Development Process, to ensure a timely completion date.

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¹ <https://www.icann.org/en/system/files/files/name-collision-mitigation-final-28oct15-en.pdf>