

Registries Stakeholder Group Statement

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

Date statement submitted: **18 April 2018**

Reference URL: <https://www.icann.org/public-comments/ncap-project-plan-2018-03-02-en>

Background¹

In response to the ICANN Board's request, the Security and Stability Advisory Committee (SSAC) drafted the Name Collision Analysis Project (NCAP) project plan. The study is intended to facilitate the development of policy on Collision Strings to mitigate potential harm to the stability and security of the DNS posed by the delegation of such strings.

SSAC is seeking community input on the project plan and in particular on

1. The proposed approach for consultation and inclusion of views and considerations from beyond the NCAP Work Party.
2. The proposed approach for providing transparency on the progress of the work.
3. The proposed approach for managing Statements of Interest (SOI) and any perceived Conflicts of Interest (COI).
4. Any additional risks that should be considered, along with any risk mitigation strategies.

Registries Stakeholder Group (RySG) comment:

The Registries Stakeholder Group (RySG) welcomes the opportunity to comment on the draft project plan for the Proposed Name Collision Analysis Project (NCAP). The security and integrity of the DNS are of high importance and the work of the SSAC is highly valued by the RySG.

RySG comments on the overall plan and timing of NCAP

While the RySG acknowledges both the ICANN Board for taking this initiative and the SSAC for developing the draft project plan, there are concerns within the RySG regarding the overall purpose and timing of the project that we wish to bring to their attention.

Purpose of the study

The purpose of the NCAP as per the Board's request is to conduct studies to better understand the issue of name collision, including the risks associated with delegating Collision Strings and how to determine which undelegated strings could be considered Collision Strings. The RySG requests that

¹ *Background: intended to give a brief context for the comment and to highlight what is most relevant for RO's in the subject document – it is not a summary of the subject document.*

the project proposal be drafted in a neutral manner so as to not pre-suppose the outcomes of the research and not to prematurely draw conclusions about risks associated with delegating future new gTLD strings. Further, we would like to see the ICANN Board recognize that these studies are being performed to identify substantial risks, and not because all new gTLDs inherently pose a risk of name collision.

Independence of new Round

The aim of this project should be to develop a framework for assessing which potential new gTLD strings could present undue risk if delegated. While it is important to get this work done properly in order to give future applicants and businesses sufficient confidence in the predictability of the ICANN process, we request that the SSAC make it clear in the chartering documents of this working group that they are not explicitly taking a position on the timing of the introduction of the next round of new gTLDs. In other words, third parties should not be able to infer from the SSAC undertaking this study that the SSAC or the ICANN community is taking a position one way or the other on whether, when and how new TLDs should be introduced in the future.

The SSAC should make it clear with the introduction of further new gTLDs, they are working towards a mechanism to (1) predict (to the extent possible) which strings present a significant collision risk, and therefore may need to not be available for future new gTLD application rounds, (2) the testing / evaluation mechanisms that need to be put in place when new gTLDs are applied for (if any), and (3) mitigation measures that may be employed which allow for the delegation of strings presenting a risk of name collisions, but for which such risk is not significant enough to prevent their delegation.

We suggest the NCAP proposal take into consideration which tasks must be completed prior to launching a new round and prior to delegating the first new strings that result from that round, and prioritize the work accordingly. In addition, this working group should maintain good contact with the GNSO in order to ensure awareness of the GNSO work on future rounds of new TLDs and also so that all proposed timelines for the introduction of new gTLDs are well understood by this working group.

RySG comments on the proposed NCAP project plan

The RySG wishes to make the following comments on the proposal for the Name Collision Analysis Project to the SSAC NCAP Work Party.

JAS Report and Lessons learned

In October 2015 ICANN published the final report '*Mitigating the Risk of DNS Namespace Collisions - A Study on Namespace Collisions in the Global Internet DNS Namespace and a Framework for Risk Mitigation*'² by JAS Global Advisors.

² <https://www.icann.org/en/system/files/files/name-collision-mitigation-final-28oct15-en.pdf>

We note that the first three tasks of Study One, described in Section 3.3.1 of the proposed project plan, start with a thorough examination of earlier research and studies in this area, particularly peer-reviewed research as well as ICANN sponsored research, work previously undertaken by the SSAC, and other community efforts. We ask that the NCAP plan include a gap analysis of this work against the current state of affairs and an analysis of the outcome of the JAS study, including an examination of why the JAS report concluded that certain name collision mitigation methods were dismissed as unviable. Undertaking this gap analysis would serve the purpose of explaining where NCAP fits into the larger body of work undertaken on name collision and pointing out where further research is needed.

We ask the SSAC to include in its Study One findings any reports ICANN received on issues related to name collision, along with any legal and/or privacy concerns that led ICANN to pursue Controlled Interruption, to allow for the community to assess the pervasiveness of name collisions issues to date and the effectiveness of Controlled Interruption and the Alternative Path to Delegation.

Research questions

The RySG supports the Proposed Plan's acknowledgement that the very first task of the group should be to define what is meant by a name collision. It should be clear, as it was in the Final JAS report, that Name Collisions can occur at the top, second or any level.

There is a long period of one up to two years between the data collection and final report; some new developments may occur during this time that are relevant for the decision-making process. We are concerned that the current proposal does not sufficiently address the potential for such new developments.

Data gathering

It is likely that the NCAP researchers will come across parties that will not be willing to share their data. If it turns out that data is not available to perform the desired studies, there should be a mechanism to terminate those studies without incurring additional expense. This is another reason why the scope of the NCAP should be as narrow and tightly defined as feasible.

If ICANN data is used by the NCAP, there must be a mechanism for independent verification and validation of the data and results. It is general good scientific practice that independent researchers (accredited for the purpose) have the opportunity to analyse the set of data to challenge the methodology and outcome of the research. The NCAP plan should include mechanisms to allow for qualified and vetted independent researchers to verify/validate the data and/or challenge the findings. Such mechanisms may include the execution of a non-disclosure agreement of certain aspects of the data, but not preventing the disclosure of overall findings or recommendations of the report.

Expected Deliverables of the NCAP Work Priority

The RySG believes that amongst the goals of the NCAP project, the Work Party should aim to:

1. Identify any strings (if any) that pose substantial name collision risks such that they should be unavailable for application in the next round of new gTLDs. In other words, the NCAP Work Party should aim to identify and publish any TLDs that would, or could, be future high risk collision TLD strings that risk causing the same perceived issues as .CORP, .HOME and .MAIL, so that registries know in advance not to apply for those strings.
2. To the extent that all such strings cannot be identified prior to actually seeing the list of applied for strings, a process should be developed to evaluate the name collision risk during the application evaluation process, and whether such risks are capable of being mitigated by appropriate mitigation measures implemented by ICANN and/or the registry operator prior to or after delegation of such strings.
3. Identify which mitigation measures (if any) must be implemented by ICANN and/or new gTLD registry operators post contract award and/or post delegation of any TLD strings that pose a substantial name collision risk. The RySG recognizes that the collision framework introduced for the 2012 Round of New gTLDs (namely, controlled interruption) was an effective tool in mitigating some instances of name collisions, but may not have properly mitigated all instances.³ To the extent another framework is deemed necessary to be implemented by the NCAP Work Party, the NCAP Work Party should clearly state the rationale behind that framework, and how the benefits of introducing any new mitigation framework substantially outweigh any additional costs or work imposed on Registry Operators, Registrars or the Internet Community.

Budget

It is of concern that the NCAP plan lacks a budget and that where one would expect a clear estimate of costs - on page 13, section 3.5 Project costs - the document only contains a warning that *'project costs could exceed US\$ 3 million over 3 years'*.

A detailed budget is indispensable. This budget should present a detailed breakdown of the estimated \$3M cost, and should specify what external factors may cause those costs to increase or decrease. The budget will allow the community to assist the project's working group in assessing the need and importance of proposed actions.

At the current stage, we have strong reservations about the need for workshops and face-to-face meetings other than during ICANN meetings and the costs related to their advertisement. We would expect that experts involved in such a study are savvy enough to use conference calls, e-mail, and other online cooperation tools. Additionally, it is unclear why administrative and project

³ See the May 2016 alert from US-CERT: <https://www.us-cert.gov/ncas/alerts/TA16-144A> .

management staff must be provided independently rather than through existing ICANN resources, as these functions are not sufficiently specialized that they require external sourcing.

The NCAP Project should have an Early Termination option after 6 months

The RySG would like to see the SSAC consider implementing regular review points, starting at around 6 months, and if at that time it turns out that any expected data is unavailable, or that no additional name collision risks above those already identified through previous studies have been identified, then nothing significant has been identified, there should be a mechanism for the ICANN Community to recommend termination of the project. The proposed US\$3+ million budget and extended (2+) year timeline for this study are significant, especially given the fact that a substantial amount of money and time have already been committed to studying name collisions. These studies should not be used as a fishing expedition to find problems or to identify solutions to problems that may not exist. An early termination option will serve as an incentive for the NCAP Work Party to work aggressively to ensure this does not become a solution in search of a problem.

Multidisciplinary approach

The RySG appreciates the extra efforts being proposed by the SSAC to open up much of the work of the NCAP to persons other than SSAC members that have the appropriate technical expertise to understand the project, the concept of name collision and the potential ramifications of any actual harms that could be caused by legitimate collisions. More specifically, we agree that all mailing lists remain open for community members to serve as observers and that there are several opportunities for the community to provide input into the project.

In addition, while we agree that technical experts should be fully utilized by this group, there should also be a place for those that have operational, policy and business knowledge about how top-level domains operate. Their insight might be instrumental to assist in assessing the potential impact of conclusions and recommendations on the industry. Having this mixed team will also assist the Working Group in making any resulting report and recommendations more easily understandable by the non-technical community.
