

April 18, 2018

**USPS Public Comment on the SSAC Proposal for the Name Collision Analysis Project
April 18, 2018**

The United States Postal Service (“USPS”) appreciates the opportunity to comment on the Security and Stability Advisory Committee’s Name Collision Analysis Project Proposal (“NCAP”). USPS is an independent establishment of the United States Government and does not receive any taxpayer dollars to conduct its delivery operations.

The Postal Service applauds the ICANN Board for requesting a detailed technical analysis of name collision issues from the Security and Stability Advisory Committee with full participation from the ICANN community. The SSAC has taken a very thorough approach to the structure of the project. Accordingly, USPS will limit its comments to certain procedural matters.

The format for more detailed Statements of Interest for members of the Working Party and the Discussion Group is laudable. USPS urges the SSAC not to make too many revisions to the questions asked as may be urged by some in the ICANN community. In this scenario, the more information available regarding the special interests of participants, the better. Accordingly, as a preface to its comments, the USPS wishes to underline that it filed formal Objections to the applications for .MAIL in the 2012 round.

The Postal Service is concerned that the risks associated with name collisions have not been fully appreciated to date within the ICANN community. It has become apparent that these risks may include the very real possibility that confidential data will be intercepted by a third party with malicious intent and that viruses may be injected by a third party inserting code into the user’s system from a third party server as a result of name collision occurrences.

Historically, USPS must maintain constant vigilance to monitor third parties masquerading as providers of “mail” services. For example, third parties exploit consumers in the online space by purporting to be an “official” Change of Address website and charging consumers up to \$39.95 for a service USPS (the true “official” Change of Address provider) provides for free at the USPS website and for only \$1.05 in its facilities. These sites and others posing as USPS also present consumer privacy and identity theft risks as they collect personally identifying information from consumers under the guise of being the “official” Change of Address provider – i.e., USPS or USPS’s agent, when that is not the case. In some cases, such activity has led to criminal enforcement by state Attorneys General. But the practice continues and has expanded into the area of Hold Mail services, with third parties collecting personal information, charging large sums, and purporting to be the “official Hold Mail” site, when that claim is false. Domains comprised of USPS trademarks such as CERTIFIED MAIL, REGISTERED MAIL, PRIORITY MAIL, and EXPRESS MAIL have been used for phishing activity, attempts to obtain consumer personal information, and malware. The Postal Service is concerned that the increased frequency of name collisions which would occur in connection with the possible delegation of a .MAIL Top Level Domain would dramatically increase these cases of consumer abuse.

Given the high risk of name collisions identified in the proposed .MAIL string from the 2012 round, USPS is grateful for the SSAC's focus on this string in Section 3.3.1 and Section 3.3.2 of the Proposed NCAP. With respect to Section 3.3.3, it is noted that mitigation strategies will likely be dependent to some degree on the exact string involved as well as prevailing conditions in the DNS at the time of delegation (as was seen in the 2012 round.). In this regard, since precise strings are unknown at this time, USPS encourages the SSAC to address the possible need for adjustments to its NCAP advice to the ICANN Board at a point in time occurring after the opening of the next round of gTLD applications.

Finally, USPS further notes that with respect to studies commissioned by the SSAC using ICANN funds, including but not limited to studies dealing with mitigation of name collision risk, such studies should be performed by independent technical experts and not by entities which have a financial interest in new gTLD applications moving forward to delegation.

Thank you for the opportunity to comment. The Postal Service looks forward to monitoring the SSAC's work on the NCAP as the Project progresses.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "D. M. Young", is centered on a light blue rectangular background.

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On behalf of the United States Postal Service