Subject: Business Constituency (BC) comment on Name Collision Analysis Project (NCAP) Study 1

Date: Tuesday, March 31, 2020 at 11:30:01 AM Eastern Daylight Time

From: Steve DelBianco

To: comments-ncap-study-1-13feb20@icann.org

CC: BC List

Below (and attached) is the comment of ICANN's Business Constituency (BC), regarding the Name Collision Analysis Project (NCAP) Study 1. (https://www.icann.org/public-comments/ncap-study-1-2020-02-13-en)

The BC appreciates the work of SSAC and of the Study authors, and offers brief comments on just two sections of the Study:

Section 4. Evidence of harm from prior experience.

The Study explains there is only scant data in evidence of collisions.

The BC is concerned that an apparent lack of evidence might lead SSAC and ICANN to become casual or complacent about collision risks in the *next* round of gTLD expansion.

The Study explains the difficulty of getting reliable evidence, so continued mitigation seems prudent. That would be especially true for .home, .corp, and .mail.

Section 5. the purpose and scope of upcoming study 2 and Study 3.

The author of this Study seems to suggest that data sets and further data studies may not be warranted:

"It is not obvious that additional datasets would be needed for Studies 2 and 3. Information on previous and recent leakage of corp, home, and mail should already be captured in the DITL and ORDINAL datasets. A current dataset for corp.com could be valuable for comparing current leakage of the corp domain to 2014-era leakage. Similar datasets for the home and mail counterparts to corp.com (e.g., home.com and mail.com) might also be valuable, although much of the same information might be available through the DITL and ORDINAL datasets.

As for identifying causes of name collisions, they have already been established in some cases, usually by individuals researching a particular leaked TLD to find its origin. There is unlikely to be any dataset that would contain root causes; identifying root causes is generally going to require research on a case-by-case basis. Based on previous research and studies, such as [76], it seems quite likely that there is not a single root cause for most name collisions, but rather several types of root causes." (page 39 of the Study)

The BC is also not convinced that we need additional data sets and studies, and defers to SSAC to make that determination.

But the BC does support further research on case-by-case basis when collision potential or problem is reported.

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This comment was drafted by Mark Svancarek and Steve DelBianco and was approved in accord with our charter.

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Steve DelBianco
Vice Chair for Policy Coordination
ICANN Business Constituency (BC)