

Noncommercial Stakeholders Group (NCSG) appreciates the opportunity to comment on the Name Collision Analysis Project (NCAP) Study 1.

The NCSG represents the interests of non-commercial domain name registrants and end-users in the formulation of Domain Name System policy within the Generic Names Supporting Organisation. We are proud to have individual and organizational members in over 160 countries, and as a network of academics, Internet end-users, and civil society actors, we represent a broad cross-section of the global Internet community. Since our predecessor's inception in 1999 we have facilitated global academic and civil society engagement in support of ICANN's mission, stimulating an informed citizenry and building their understanding of relevant DNS policy issues.

First of all, we would like to thank both the contractor of study 1 - namely Scarfone Cybersecurity - and the SSAC to have stressed efforts to draft this document.

Overall, the NCSG approves the approach and the methodology used since the genesis of the project that leads to SSAC recommendations to conduct three different studies regarding Name Collisions in the Domain Name System. The draft report aligns with both the Request For Proposal (RFC) issued by the ICANN OCTO and the SSAC proposal for the Name Collision Analysis project (NCAP). Nevertheless, we have a few remarks regarding the draft document published and which is subjected to the present call for Public Comment.

Firstly, we would like to invite the contractor to start their report with an Executive Summary that briefly highlights their findings, the methodology used and how they meet the requirements and objectives set within the RFC, and clearly conclude whether or not Study 2 and 3 are needed.

Secondly, we would like to know the effectiveness of the number of prior works provided, i.e how confident Scarfone is that they have conducted a very broad research and done all their best to include most of the prior works related to Name Collisions in the DNS.

Thirdly, we suggest that the study includes more qualitative and quantitative details about the datasets surveyed (dataset fields, fields lifetime, fields accuracy, quantity of data collected, etc.) in order to compare them, but also to detect any gap as compared to what is actually needed. Otherwise, we believe that there are not sufficient reasons to make the conclusions in section 5.2.

In a separate note, we inform you that we found a missing reference in Section 5.1 (line 1317).

In summary, we appreciate the work done by the SSAC and Scarfone Cybersecurity to conduct this survey and concur with most of its content. However, we insist that the comments made above should be given due attention in order to improve the draft and set a strong basis for the future studies.