

Statement of the Non-Commercial Stakeholders Group on the Proposed Definition of Name Collisions and Scope of Inquiry for the Name Collisions Analysis Project

1. The Non-Commercial Stakeholders Group (NCSG) welcomes the opportunity to provide input on the updated Proposed Definition of Name Collisions and Scope of Inquiry for the Name Collisions Analysis Project. In keeping with the stated Purpose of the Public Comment, we will restrict the content of this Statement to what was specifically requested in the call -- definition and scope of inquiry. Nonetheless, we shall bring up information mentioned in other Name Collision Analysis Project (NCAP) Working Documents as they relate to the discussion at hand.
2. The NCSG represents the interests of non-commercial domain name registrants and end-users in the formulation of Domain Name System (DNS) policy within the Generic Names Supporting Organisation (GNSO). We are proud to have individual and organisational 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 (the Non-Commercial Domain Name Holders Constituency, NCDNHC), 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 Domain Name System (DNS) policy issues. We believe our evidence-informed public interest-orientated contributions provide balance against state and market interests.

On Scope of Inquiry and Risk Assessment

3. The [Revised NCAP Proposal for Board](#), dating back to February 2019, contains a list of risks that may threaten the project as a whole. The main risk ("The WP may not be able to produce any useful and/or authoritative output") is rated as "High" and all other subsequent risks (encompassed by the first one) are similarly deemed "High." Those risks are a consequence of the complexity of the three studies proposed by the NCAP and of the volumes of data it requires to fulfill the Board's five criteria (it must be thorough, inclusive, timely, organized and transparent.)
4. The Proposal raises stark points regarding the studies and how well they may fit some of the Board's requirements. For example:

"The NCAP WP notes that some of these are sufficiently highly rated that they render problematic any estimates of timelines or budgets to complete this research."

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"1. The production of an upfront plan when so much of the project is not yet understood leads to a significant degree of estimation, which may contain several errors.

2. The nature of this series of studies is largely dependent upon what is found in earlier steps. Results of examination of data from known sources and those volunteered by new ones are likely to present new areas for exploration. That makes estimating subsequent work a best estimate based on experience working on complex projects. Thus, the estimates for project scope, timelines, and costs may diverge significantly in later stages."

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5. NCAP's approach towards setting a restricted scope of inquiry, further divided into two groups (A.) In scope and subject of data studies, and (B.) In scope but not intended to be the subject of data studies), followed by a third group (C.) Out of scope) ultimately comes across as a prudent choice when this is kept in mind. The further addition of topics to the data studies runs the risk of worsening the odds of a project already dealing with a colossal task.
6. The latest information available regarding budgetary concerns dates to March 2018, in the [SSAC Proposal for the Name Collision Analysis Project](#), where the project's cost is estimated at a 3 million USD budget over 3 years. Since then, in the two following documents made available in the NCAP wiki, the Budget topic has been redacted.
7. The information presented here relates strongly to the Scope of Inquiry. Expanding it any further most likely will raise an already high budget, alongside increasing the chances of failure under any of the risks previously mentioned in this Statement. This could also spell, ultimately, the waste of a fraction or the totality of the sum invested into this project. We suggest, then, that the SCAP avoid any further additions to the Scope of Inquiry, mainly to the Group A (In scope and subject of data studies).
8. Regarding the Scope of Inquiry itself, after reading the available documents, including reports from NCAP, we did not reach any proposed changes to what was already stated. An attempt towards reducing the Scope of Inquiry even further could go against the Board's criteria of a thorough study, which ultimately would be counterproductive. Additionally, it is noteworthy that under the most recent proposal Study 1 has been reduced in scope.

"Study 1 is reduced in scope (and therefore also cost and duration) by removing the creation of the data repository and deferring this work to Study 2. Not all work with data sets is deferred, however: an analysis of available data and what gaps would remain if that data were procured is still performed. The length of Study 1 is reduced by three weeks and the cost reduced by [CONFIDENTIAL FINANCIAL INFORMATION REDACTED]."

9. In this sense, the NCSG believes that the expansion or reduction of the Scope of Inquiry would cause several problems and risks towards the three studies that the NCAP must conduct, and in the presentation of the final report that will be very important in order to the creation of new Generic Top-Level Domains (gTLD's), since the name collisions have the power to cause harm to not only the user, but to the TLDs applicants due to the use of strings that may introduce security or stability problems at the root level of the DNS, for example.

10. Thank you again for opening this conversation up to the community. We are grateful to ICANN for this opportunity to share our perspectives on this important issue that impacts us and other community members, and we trust you will find our recommendations helpful. Finally, the NCSG would be happy to participate in any further discussions related to the subject of this present contribution in order to answer any clarifying questions that you may have regarding the contents of this document.