To: comments-ssac-review-final-15oct18@icann.org Date: Oct 21, 2018

Comment re: <u>Draft Final Report</u> of The Second Security and Stability Advisory Committee Review (SSAC2) a/k/a "Independent Review of the ICANN Security and Stability Advisory Committee (SSAC)" <u>Draft Final Report</u> (pdf)

I have read all 84 pages of this mostly worthless report, much of which is regurgitation of already existing documentation that could, and should, have been referenced via footnotes and an appropriate appendix, but I guess the "Review Team" had to justify their fees somehow.

The report fails to meet its purported purposes (p.2 of the draft), including, but not limited to, "How effectively the SSAC fulfills its purpose and whether any change in structure or operations is needed to improve effectiveness. The extent to which the SSAC as a whole is accountable to the wider ICANN community, its organizations, committees, constituencies, and stakeholder groups."

On July 1, 2018, I sent the email below which the Review Team conveniently ignored, and even followed that email up with a question at the <u>Assessment Report Webinar - 12 July 2018 @ 20:00 UTC</u>, only to be given a vague, non-responsive answer.

The fundamental, core failings of the SSAC (and as a result, ICANN) to the global internet community, including domain name registrants worldwide (as raised in my email below), are <u>not</u> addressed in the "Draft Final Report."

It is not hard to understand why most ICANN reviews are considered by many a "waste of time" and ICANN is held in such low regard by the global internet community, including most domain name registrants worldwide.

John Poole gTLD Domain Name Registrant, and Editor, <u>DomainMondo.com</u>

cc: NTIA (David Redl), and Federal Trade Commission (FTC)

----- Forwarded message -----

From: John Poole

Date: Sun, Jul 1, 2018 at 2:05 AM

Subject: Comment re: SSAC2 Review: Assessment Report

To: mssi-secretariat@icann.org

Comment re: **SSAC2 Review: Assessment Report** via email to: <u>mssi-</u>

secretariat@icann.org

I request that the **Analysis Group** address **SSAC'**s inexplicable **failures** in regard to **new gTLDs**--failures subsequently acknowledged, implicitly, by SSAC's ICANN Board liaison-read: <u>More Problems Crop Up With Universal Acceptance of Top Level Domains</u> by Ram

Mohan, Feb 07, 2014, particularly in view of <u>ICANN's contract provision</u> with **new gTLDs registry operators**:

"1.2 Technical Feasibility of String. While ICANN has encouraged and will continue to encourage universal acceptance of all top-level domain strings across the Internet, certain top-level domain strings may encounter difficulty in acceptance by ISPs and webhosters and/or validation by web applications. Registry Operator shall be responsible for ensuring to its satisfaction the technical feasibility of the TLD string prior to entering into this Agreement." (emphasis added)

And further, SSAC failing to demand or even recommend that either ICANN or the new gTLDs' registry operators and registrars **warn** prospective registrants of **new gTLDs' domain names** "failing to work as expected on the internet."

How could a group of otherwise competent professionals be so irresponsible and negligent? I can only speculate, but I attribute it to "**conflicts of interest**"--for example, Ram Mohan, a member of the SSAC and ICANN Board (2008-present) is employed by **Afilias**, a new gTLDs applicant and TLD registry operator, including providing new gTLDs' backend registry services.

What we now know is that apparently **no one** tested for **"technical feasibility"** <u>before</u> hundreds of <u>new gTLDs</u> were negligently and irresponsibly delegated by ICANN into the global internet root-- <u>UASGO17</u>: Evaluation of Websites for Acceptance of a Variety of Email Addresses:



<u>UASGO17</u> (pdf): "**Conclusion:** There is much work to be done to get many of the world's websites UA and EAI-ready. Where we thought we could address just a few applications and code repositories, that does <u>not</u> appear to be the case."

But **domain name registrants** still are <u>not</u> warned that their **new gTLDs' domain names** may "fail to work as expected on the internet." Occasionally they show up at an ICANN meeting to complain, but **no one of consequence at ICANN cares about domain name registrants**--<u>"it's all about the money."</u>

Respectfully submitted,

John Poole Domain Name Registrant and editor, <u>DomainMondo.com</u> July 1, 2018