**DotHome Inc. Comment on ICANN’s proposal to mitigate Name Collision Risks**

Dear ICANN Board,

On behalf of DotHome Inc., we would like to take this opportunity to voice our concern over the recent name collision report put together by the Interisle Consulting Group and the ICANN staff recommendations that are being proposed in response to the former. This comment is being made specifically in relation to the two strings classified by ICANN staff as “high risk” i.e. .Home and .Corp.

While all the other comments that will be sent in by applicant groups will serve to highlight the flaws in the Interisle study and the ICANN staff proposal in order to further the interests of stakeholders involved with “uncategorized risk” strings, we would like to use this particular comment to emphasize the issues which we believe apply primarily to .Home and .Corp, and which most other comments will probably not put forth to ICANN.

We do acknowledge and concede to the fact that the sheer number of queries that were observed in .Home and .Corp is alarming, and that certain proactive risk mitigation measures are undeniably necessary for the sake of safety.

Having said that, we strongly believe that the analysis conducted by Interisle for .Home and .Corp is grossly insufficient, and the proposed recommendation by ICANN staff to indefinitely delay delegation of .Home and .Corp is entirely unjustified.

The key issues that we would request ICANN to consider are:

1. **From a risk perspective, the quality of queries in .Home and .Corp are MUCH more important than quantity of queries**

The Interisle study simply counts the absolute number of queries received in .Home and .Corp, and then compares this count against the same count for all the other strings. Clearly, this should not and must not be the only metric used by ICANN staff to make the imprudent recommendation that .Home and .Corp should be indefinitely delayed.

The study makes no mention of the following more important statistics from the data in .Home and .Corp:

1. The number of unique domain names queried
2. The types of unique domain names queried
3. The number of unique sources / IP addresses of queries
4. The distribution of unique sources / IP addresses of queries

The reason we believe that the above statistics would be more important to analyze is as follows:

Theoretically, it is possible that there are a handful of large organizations which use the .home extension in their internal networks. And add to this one or maybe two massive hardware enterprises who may have hard coded their devices / software to automatically append a <.home> to any query that is routed through it. Together, these two factors could possibly be responsible and account for the bulk of the 9.5 million queries seen in .home.

It is also possible that there may be a finite number of unique domain name queries issued in .home if used in case of the internal networks. And / or queries in .home may be originating from a handful of easily identifiable sources / IP addresses in such a case. Mitigating such a risk, if identified, would actually be fairly straightforward (and targeted).

Conversely, consider a large number of smaller widely distributed stock broking businesses that could theoretically be using the .trade (Rank 303) extension (44,000 queries) on their internal network for trading or storage of sensitive and confidential information. Naturally, if this were true, there may also be a relatively larger number of unique queries in .trade originating from a widely distributed number of sources / IP addresses. This risk, if identified, could potentially be a lot more challenging and complicated to deal with. But ICANN staff currently proposes to qualify it as “low risk” and therefore allow it to proceed on to delegation without analyzing the abovementioned metrics.

Thus, it is grossly incorrect on the part of ICANN staff to simply classify .Home as a “high risk” string merely by summing the number of queries, and without analyzing the unique domain names queries and unique sources of these queries. And the indefinite delay is entirely unjustifiable. We submit that a shorter more targeted study should be commissioned by ICANN to simply extract and analyze the unique domain names queries and unique sources of these queries in .Home. Furthermore, the data used for such a study MUST be pre-dated, as explained below.

1. **Any new data used for further studies in .Home / .Corp can easily be compromised / gamed**

In the situation that ICANN does choose to carry out further studies in relation to .Home and .Corp, we would like to caution ICANN against the usage of any data that has been / will be collected after the commissioning of the Interisle study. There is an almost undeniable likelihood of such “new” data being gamed or compromised. Some important points to consider:

1. The Internet community and any interested members of the general public are now aware that “query counts” have been used to determine the level of risk that any proposed gTLD poses
2. They are also aware of the exact list of proposed gTLDs for which further studies of data will be carried out in order to ascertain refined risk levels
3. It is extremely easy to purchase a software or a service that can send a gigantic amount of targeted queries from multiple sources for non-existing strings of a particular kind/s for resolution
4. There are several parties that have vested interests, or stand to benefit from the delay or potential non-delegation of the so-called “riskier” strings
5. Thus it would be / is incredibly easy for any newer data to be manipulated for personal gain

In light of the above, we assert that ICANN should make it mandatory for all future studies to use only pre-dated data (before commissioning of the Interisle study), which is more likely to be more representative of actual usage of .Home and .Corp in internal networks.

**Recommendation for ICANN Board**

We urge ICANN to evaluate and analyze our suggestion for mitigating name collision risks in .Home and in all other gTLDs.

**Allow all strings (including .Home) to be delegated subject to certain mitigation measures**

We firmly believe that there is a relatively simple series of steps that can be taken to mitigate the real threat that ICANN staff foresees with respect to name collision. Evaluating and enforcing the following can allow all strings, including .Home to proceed on to delegation while successfully avoiding unnecessary delays:

**Phase 1: 3 months after delegation**

1. Registries should not sell / register / activate any domain names in their gTLD for a 3 month (120 day) period following delegation
2. Registries should use these first 3 months (Phase 1) after delegation to simply gather data about every single query in their gTLD (Processes such as Sunrise notification should run simultaneously during Phase 1)
3. Needless to say, all such queries would receive NX Domain responses during Phase 1
4. At the end of Phase 1, the Registry should use the list of queries received during the last 3 months to build a set of all unique SLDs that were queried in their gTLD
5. ALL these unique SLDs should be blocked, and not be made available for sale

**Phase 2: Next 3 months**

1. During the next 3 months (Phase 2), the Registry should proceed with their business plans for all SLDs, barring those contained in the blocked list
2. Any queries for these blocked names will continue to receive NX domain responses during Phase 2 as well
3. During the first 30 days of Phase 2, the Registry should make a set of prescribed efforts to effectively communicate with the unique sources / IP addresses from where queries on the blocked list (during Phase 1) originated
4. A pre-set time frame of 60 days should be granted to allow the concerned organizations / authorities to fix the issues or make the necessary alterations to their internal networks
5. At the end of Phase 2, the SLDs on the blocked list should be made available for sale

We genuinely believe that a mitigation strategy based on the above recommendations or some variation thereof, if applied to all TLDs will serve to alleviate even unforeseen threats in TLDs that ICANN staff has inadvertently qualified as “low risk”.

We appreciate ICANN’s proactive response to the Interisle study, and look forward to our recommendation being addressed as part of the risk mitigation exercise. We would also like to express our willingness to work with ICANN staff in order to further the new gTLD program in a manner that is mutually beneficial.

Sincerely,

Brijesh Joshi

DotHome Inc.