

August 27, 2013

Mr. Charine Chalaby, Chair
New gTLD Program Committee
Internet Corporation for Assigned Names and Numbers

Dear Mr. Chairman and Members of the New gTLD Program Committee:

The team at .Club Domains has reviewed the Interisle Consulting Group report, issued on August 2, 2013, (hereafter the Interisle report) and we strongly believe that .club should be classified as a low risk gTLD for the reasons outlined in this comment.

.Club Domains agrees with NTAG's conclusions that the Interisle report does not support ICANN's decision to delay the delegation of gTLDs with very low traffic like .club.

1. *NTAG points out that the problem has been overstated.*
45% of DNS requests are for non-existing TLDs and only 3% of the total queries are to applied for gTLDs.¹ Moreover, the vast majority of queries to applied for gTLDs are for .home and .corp. This suggests that ICANN can solve a large portion of the problem by declining to delegate .home and .corp.

2. *The previous expansions caused no known issues.*
.xxx, .asia, .kp, .ax, .tel, .um, .cw, .post, and .sx each received more traffic than .club before delegation, and the speculative risks that the Interisle report finds could exist have not arisen.²

3. *The suggested risks already exist with currently delegated TLDs.*
Private networks can (and do) assign already delegated TLDs, and this delegation has not posed a threat to the DNS, nor has it caused the registry operators of any currently delegated TLDs to refrain from registering domains.

4. *Risk Measurement is easily distorted, intentionally or unintentionally.*
Many companies and entities have significant financial stakes in this process including .club. In an environment such as this, it is dangerous to rely solely on statistics and analytics which can be easily misinterpreted. Moreover, the general interest in the new gTLD program will itself generate traffic to the new gTLDs. Merely finding that there is traffic to the proposed gTLDs is

¹ See Figure 1 of the Interisle report.

² Verisign Labs Technical Report #1130008: Verisign New gTLD Security, Stability, Resiliency Update: Exploratory Consumer Impact Analysis, Table 1. <http://techreports.verisignlabs.com/docs/tr-1130008-1.pdf>.

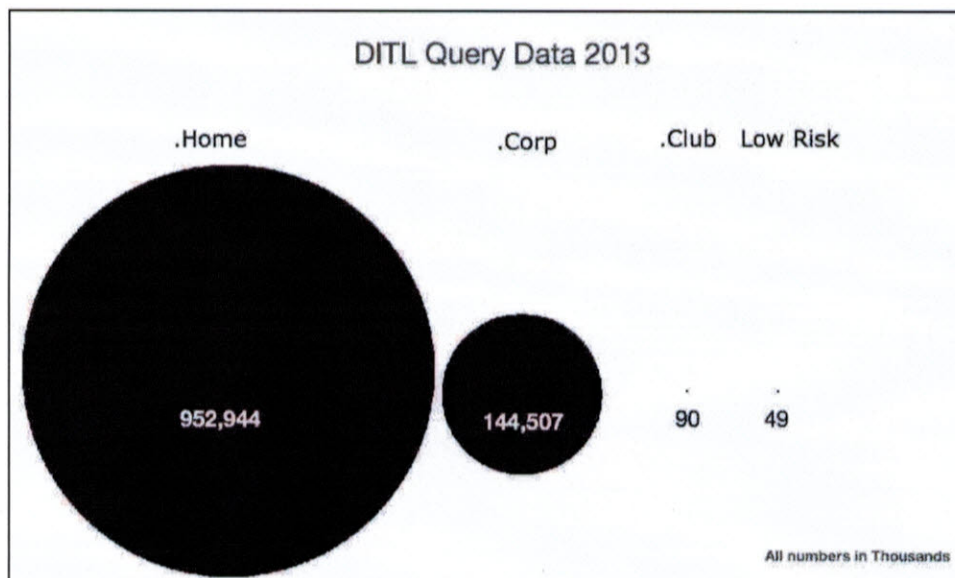
nothing more than a speculation of risk, rather than an evaluation of risk.

In comparison to the gTLDs that ICANN has classified as high risk, .club has received a minimal amount of queries.

ICANN classified as low risk all gTLDs that had 49,000 or fewer queries, as indicated in Appendix B of the Interisle report. ICANN classified as high risk .home and .corp, which had 952,944,000 and 144,507,000 queries, respectively in 2013. The Interisle report indicates that .club had 90,000 queries during the same period. ICANN classified .engineering, .tata, and .music as low risk with queries of 49,000 for each.

Relative to the substantial number of queries for .home and .corp, the difference between 49,000 and 90,000 is statistically insignificant. For 2013, the difference in queries between .home and .club is 952,854,000 while the difference in queries between .home and .engineering, .tata, and .music is 952,895,000. This is a variance of 0.0043%. Similarly, the difference between .corp and .club is 144,417,000 while the difference in queries between .home and .engineering, .tata, and .music is 144,458,000. This is a variance of 0.028%.

The difference between .club and the “low risk” gTLDs is virtually non-existent, as the diagram below illustrates.



Moreover, ICANN has given no rationale or reasoning for drawing the “low risk” line at 49,000 queries. The fact that .club is so much closer to the gTLDs which are classified as low risk than those which are classified as high risk, combined with the fact that the 49,000 query threshold is more or less arbitrary, is sufficient to support a finding that .club’s inclusion in the Uncalculated Risk category occurred arbitrarily. ICANN’s only apparent justification for setting the threshold at 49,000 queries is the statement that “[t]he [Interisle] Study identifies approximately 20% (or 279) of the distinct applied-for new gTLDs for which the impact of name collision warrant additional investigation.”³ However, nothing in the Interisle report makes such a recommendation.

ICANN is granting preferential treatment to the registry operators of .xxx, .asia, .kp, .ax, .tel, .um, .cw, .post, and .sx when it imposes DNS query requirements on .club, even though the queries to .club are below the queries to these TLDs.

According to Verisign's own report, .xxx, .asia, .kp, .ax, .tel, .um, .cw, .post, and .sx each received more invalid queries in 2006, prior to their respective releases, than all but the top five queried gTLDs in Interisle study.⁴

In delaying .club as an uncalculated risk, ICANN failed to take into account Interisle’s finding that no X.509 certificates have been issued for .club.

The Interisle report suggests that an important indicator of risk is how many private X.509 certificates have been issued for potential gTLDs. Appendix C of the Interisle report lists each domain that was assigned three or more private X.509 certificates. ICANN did not consider the fact that .club appears nowhere on this list, even though the absence of .club from this list is a substantial indicator that the delegation of .club will not cause a risk of collision with private networks. ICANN’s failure to consider the X.509 certificates supports NTAG’s assertion that ICANN’s decision to delay delegation cannot be supported by the data contained in the Interisle report.

³ ICANN. Secure and Stable Introduction of New gTLDs. <http://www.icann.org/en/about/staff/security/ssr/intro-new-gtlds-05aug13-en.pdf>

⁴ Verisign Labs Technical Report #1130008: Verisign New gTLD Security, Stability, Resiliency Update: Exploratory Consumer Impact Analysis, Table 1. <http://techreports.verisignlabs.com/docs/tr-1130008-1.pdf>



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Recommendation

.Club Domains believes that the set of gTLDs that ICANN classified as uncalculated risk was overly inclusive. Based on the aforementioned reasons, we recommend that ICANN shorten the list of gTLDs classified as uncalculated risk in such a way that .club and other low traffic gTLDs are classified as low risk.

Very truly yours,

A handwritten signature in black ink, appearing to read "Colin Campbell".

Colin Campbell
CEO and Chairman
.Club Domains, LLC

