

17 September 2013

Dear ICANN Board and Staff,

We, the members of the New TLD Applicant Group (“NTAG”), write to expand upon [our initial comment about name collision and Security, Stability and Resiliency \(“SSR”\)](#) and to reply to some comments we disagree with that were submitted during the initial 21-day commenting period for this topic. This letter reflects the interests of the entire NTAG. It is the result of an unprecedented, cooperative effort between rival applicants and with organizations outside of the ICANN community that are concerned about cyber security.

But before diving into the heart of this letter, we invite you to take a step back. Stability and security with the new gTLD program are core to ICANN’s mission and vital to the success of the entire program. If any gTLD launch goes awry — especially if due to SSR issues — it could spoil consumer adoption for all applicants who’ve launched or are waiting to launch. This is why NTAG believes it is in our interest to support enhancements to cyber security, including to convey data-driven analysis that helps you to decide what is best for the new gTLD program from a SSR perspective.

Since submitting the first letter, NTAG has been hard at work to provide you with what we hope is a substantial, data-driven update and reasonable mitigation approach:

- NTAG members have donated thousands of dollars worth of hardware to help OARC, the provider of root query data, to upgrade its capabilities to allow for greater access to and further study of Day in The Life of the Internet (“DITL”) data that is the subject of the Interisle report.
- NTAG has extracted OARC-provided DITL data and analyzed it based on the structure outlined in [Appendix B](#) to this letter. The slight differences between the NTAG analysis and Interisle’s are discussed in [Appendix C](#).
- NTAG members convened a live TLD Security Forum on 22 August to discuss the merits of the Interisle report and how we can supplement it with what we believe is more reasonable analysis. Engagement has been so compelling that it has encouraged NTAG to move ahead on the efforts described below, as well as to convene another live TLD Security Forum in Washington, D.C. on 1 October¹. ICANN Staff and Board are more than welcome to attend and join the many other stakeholders who plan to participate.

We do not wish to toot our own horn, but need to stress how incredible it has been for NTAG to unite on the above efforts within such a brief period of time (*i.e.*, 20 calendar days since staff posted name collision for public comment). You can imagine how daunting it has been to gather and analyze data that helps to provide perspective to the Interisle study and Verisign’s comments. Interisle has been commissioned to conduct the name collision study for ICANN. Verisign, as a root server operator, has private access to data. As such, both entities have had at least a six-week head start to access and

¹ <https://tldsecurityforum.eventbrite.com>

analyze root query data and frame discussions about name collision and security risks with the new gTLD program.

Based on the NTAG's efforts to date, below we outline as objectively as possible what we believe could sufficiently mitigate name collision risks and why. We believe that this letter can help the Board with its effort to reach a balanced (i) understanding of cyber security impacts with the new gTLD program and (ii) decision of the name collision issues.

Massive Overcounting of Collisions

Our initial response letter pointed out an obvious issue with using root query data as a proxy for measuring the proportion of DNS queries made against non-delegated TLDs: caching. The caching issue overestimates the number of collisions as a fraction of overall query traffic in multiple ways, due to both the effect of delegated domains having long TTLs and the standard treatment of TTLs on negative responses by recursive DNS servers.

It is our understanding that Google intends to submit a detailed paper on this issue, based upon data collected from their recursive PublicDNS system. We urge the Board and Staff to pay close attention to their findings, which include the fact that the root data set often overstates the number of collisions by a factor of 39x (.corp) and even up to 500x (.ice).

Our Suggested Mitigations

The NTAG has come up with a set of mitigations that we believe reduces the risk from name collisions to an acceptable level, and to well below the risk of any other TLD delegated in the last decade.

The mitigations fall into two categories: those applied to all TLDs and those applied to only the most problematic.

We recommend that ICANN mandate implementation of the following protections at the registry level for each new TLD:

- Prevent registration of second level domains corresponding to the major existing gTLDs².
- Prevent registration of specific terms related to the Internet, networking, protocol, web related file extensions or common internal hostnames. This list is included in [Appendix D](#).
- Exclude terms that a rightful owner has entered into the TMCH, require a one-year hold on second-level domain registration for strings that present more than a certain number of queries represented in the DITL data, with a custom hold list generated for each proposed TLD. In [Appendix A](#), NTAG presents a chart showing collision risks before and after applying the proposed hold for strings that present more than 10,000 queries. The 10,000 threshold is merely a suggestion. We leave it to the Board and Staff to decide the acceptable risk threshold. In a

² com, net, org, biz, edu, gov and mil.

couple of weeks, NTAG will be able to generate and report a custom list for each proposed new TLD at various threshold levels: 50,000 queries, 20,000 queries, 10,000 queries, 5,000 queries, and 1,000 queries. An example list for one proposed new TLD, .med, is included in [Appendix E](#), along with the list of all 210 strings that would exceed a 10,000 query threshold.

- Block the registration of the decimal integers between 0 and 255 as an SLD under the new TLDs. This will prevent collisions from malformed reverse DNS lookups on IPv4 addresses.

The NTAG believes that this is a good base set of requirements, but that all of these protections could be reconsidered on a case-by-case basis using the RSEP process. It is likely that most of these protections would not be relevant to closed “.brand” TLDs, and we look forward to discussing more nuanced protections for those applications.

For three of the most controversial new TLDs, .corp, .home and .mail, we propose the following path forward:

1. That string contention be resolved in the normal order of business for all three strings.
2. That contracting and delegation move forward with the parties that emerge from contention, assuming that they agree to the following protections:
 - a. That they operate a 90 day sunrise period for all strings.
 - b. That they operate a one-year extended sunrise period for the most common brand names seen globally in name collisions. A tentative list of about 800 brand-related names, generated from the top 2000 strings seen as SLDs, is available in [Appendix F](#).
 - c. That they operate a one-year hold for the top 50 SLDs seen in requests for each TLD, assuming such strings have not already been included in previous lists. A list of these names is found in [Appendix G](#).
 - d. That while domains could be pre-sold for each TLD that no second level names will be delegated for a period of one year.
 - e. That the TLD server logs from each of these new TLDs be turned over to OARC monthly for analysis by interested parties. This would allow ICANN and others to gauge the effectiveness of this risk mitigation program as it operates.
 - f. That these protections could be shortened via the RSEP process, if supported by DNS query data.

Conclusion

In summary, our research shows that only a few known items are outstanding and require one or two weeks of further study. NTAG will follow-up this letter with a final report that includes these remaining items. Notably, NTAG will provide a report of registration hold lists for all proposed new TLDs and charts showing how implementing such holds would reduce name collision queries below certain risk thresholds, including the threshold which Board and Staff are to determine represents an adequate level of risk. What is known now provides strong support for permitting the new gTLD program to safely and successfully proceed, provided NTAG’s proposed mitigations are implemented.

Safety and success of the new gTLD program is important and achievable. Complaints with one new gTLD could risk prospects for all participants, inside and outside of ICANN. Because NTAG members understand this obvious correlation between consumer trust and new gTLD adoption, we're committed to taking actions that align with the interests of Internet users. Name collision mitigations are but one example where we strongly believe that launch of the new gTLD program could help to enhance cyber security for users.

To help Board and Staff develop a fuller view and understand our commitment to cyber security, we encourage attendance at the second NTAG-sponsored TLD Security Forum. Specifically to Board members, irrespective of the stakeholders or committee(s) you represent, we believe that participation in the forum could help to inform your decision for moving forward on the name collision issue and deepen your understanding of cyber security for related future issues. Simply RSVP your interest in attending the TLD Security Forum at <https://tldsecurityforum.eventbrite.com>.

Among other content, a live overview of the issues — including an update of the remaining research items — will be provided. Participants can also look forward to hearing from voices outside of the ICANN community with a relevant take on Internet security issues. These conversations continue the productive talks from the first forum, where experts and stakeholders concerned with cyber security, including PayPal and a major certificate authority provider, joined the ICANN community to help address name collision risks, promote security with the new gTLD program and otherwise provide input on the evolution of the Internet as championed by ICANN.

Thank you for considering the data and analysis in this letter. We appreciate you taking time to hear our views before deciding this issue, especially because we've only recently gained access to the data necessary to add valuable input to the discussion.

Sincerely,
Members of the NTAG

Appendix A: Before and After Mitigations

The NTAG modeled the effect of removing SLDs that cannot be registered (such as `_msdcs`), filtering for the Chrome random 10 letter domains (which account for no security risk) and applying our suggested mitigations against the 2013 DITL dataset. This included the special treatment (a one-year hold with exceptions for TMCH terms) of all SLDs that have received more than 10,000 requests in that dataset. The 10,000 request line is completely arbitrary, and was chosen by the NTAG as a strawman proposal. We will provide the Board and Staff with simulations of other thresholds in our next report.

Figure 1: This chart shows the number of requests for the top-10 proposed TLDs in the DITL 2013 data, alongside the remaining collisions after taking into account the protections NTAG recommends in this letter.

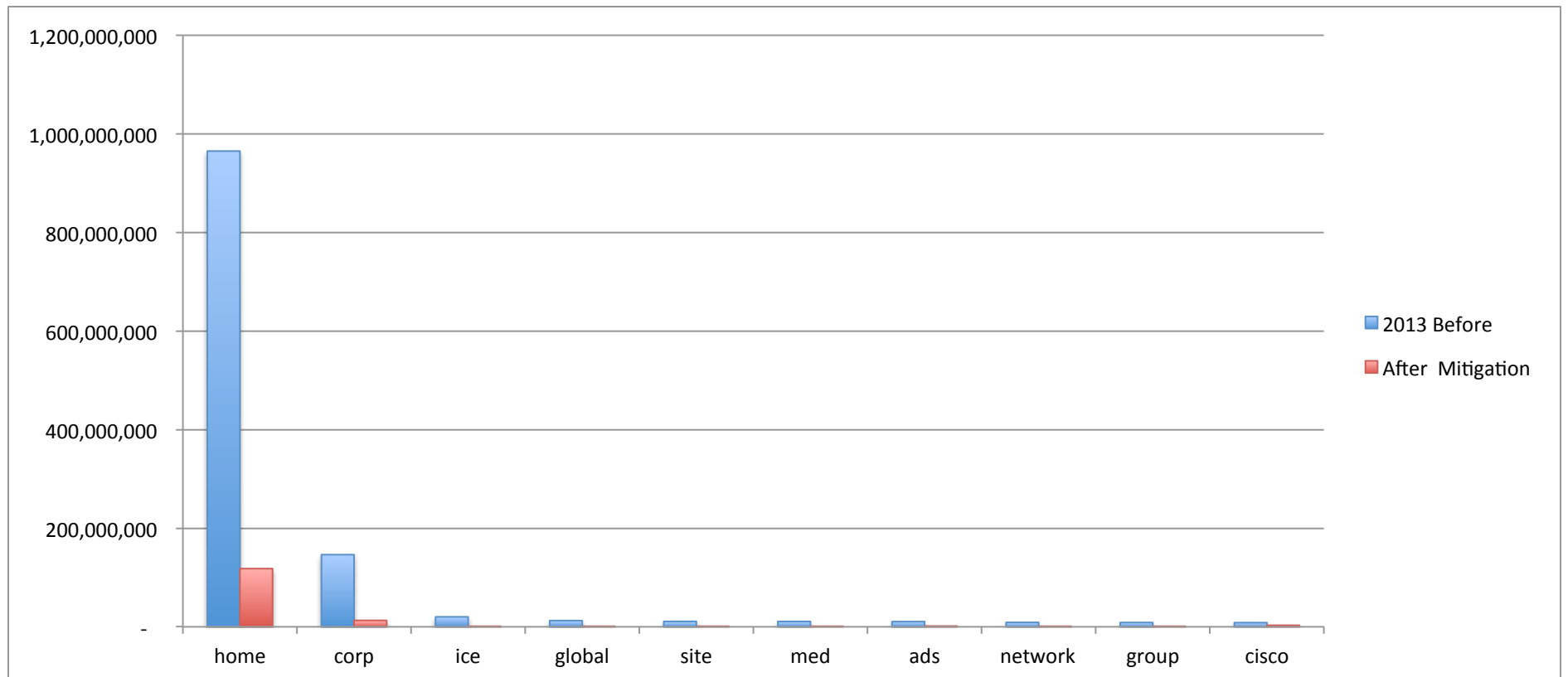


Figure 2: This chart shows the same information for the 10 most frequent TLDs outside of .corp and .home.

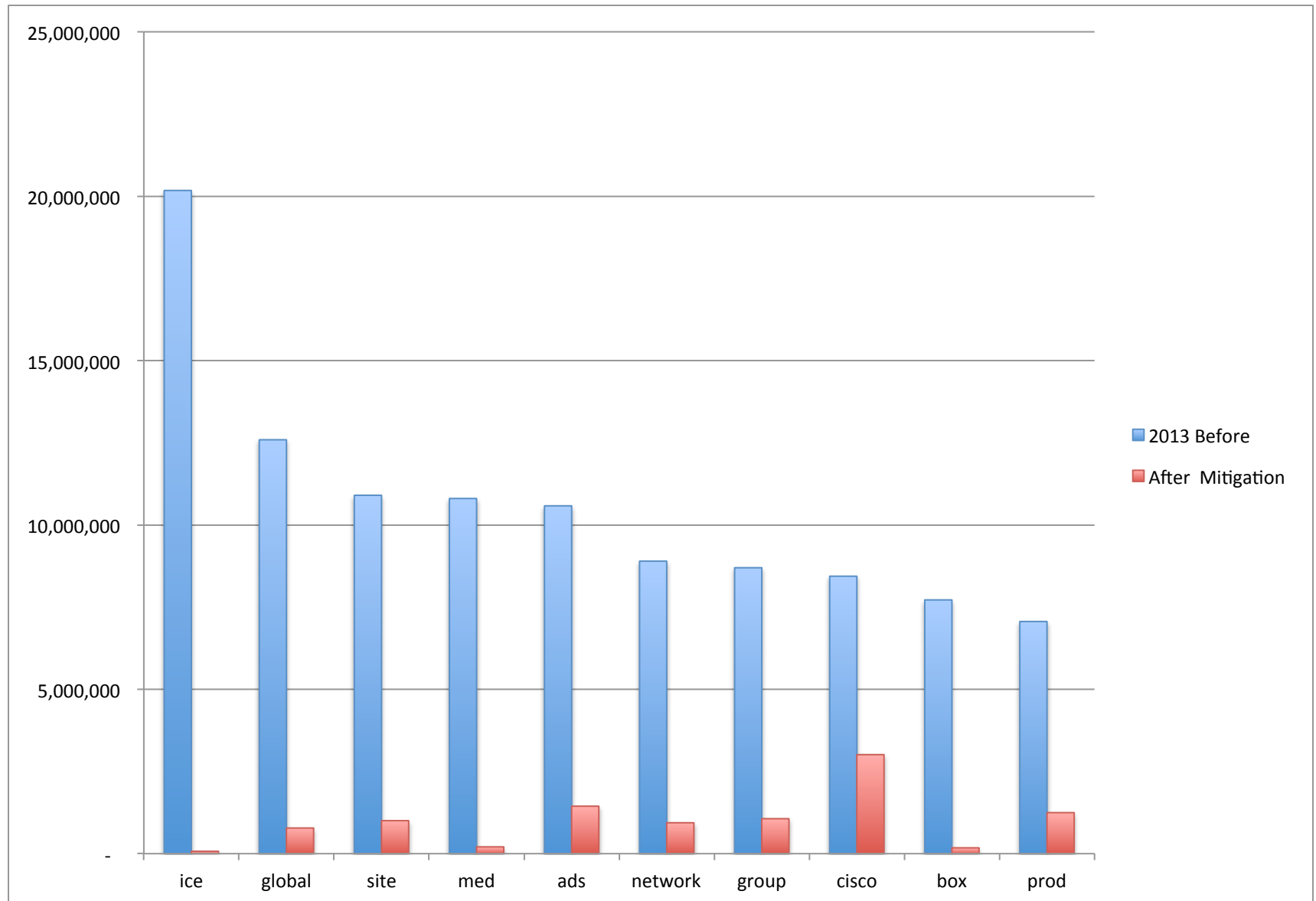
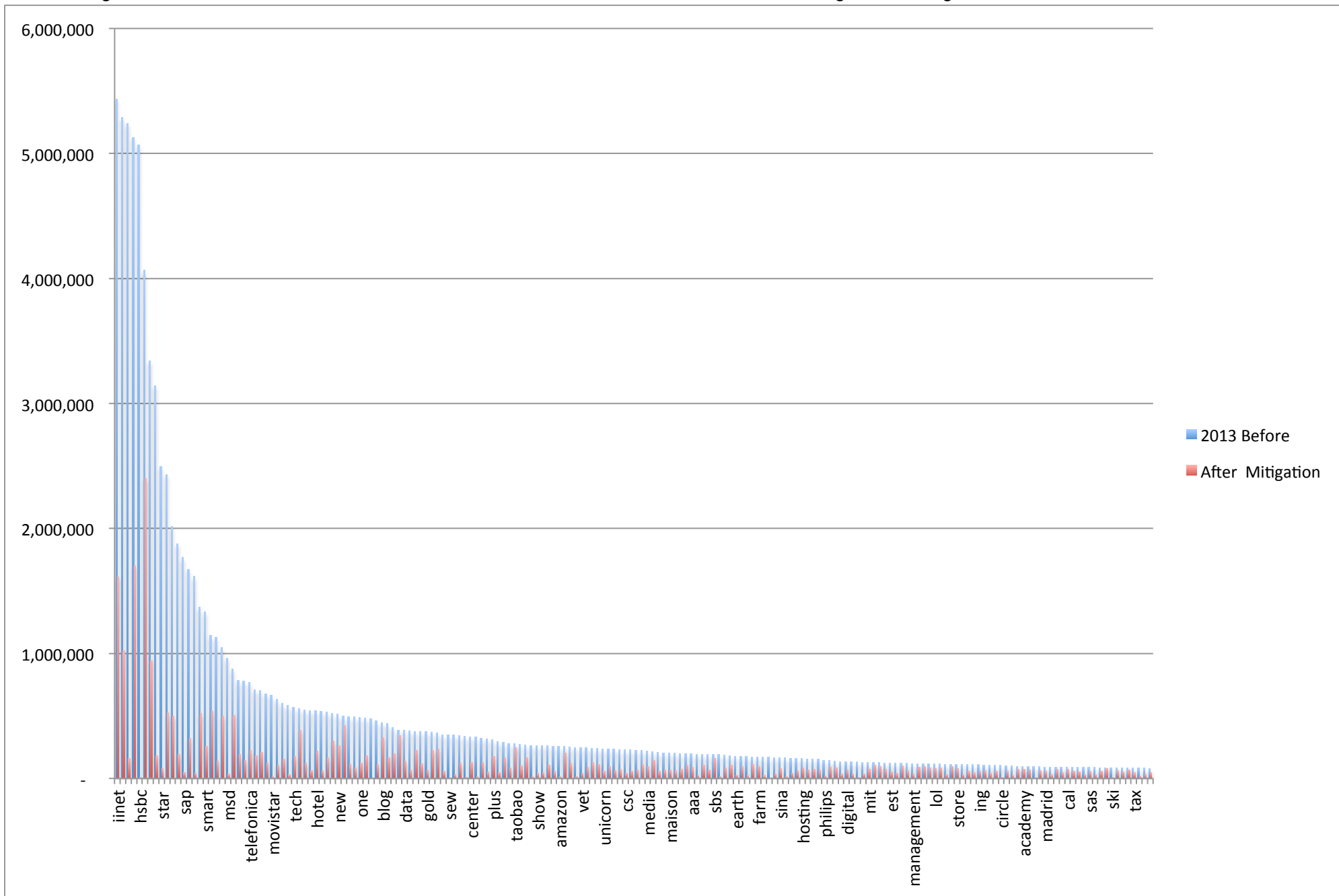


Figure 3: This chart shows the same before and after counts for the 200 TLDs following those in Figure 2.



Appendix B: Data Extraction Process

As part of the DITL (Day In The Life) project, data captures are provided to the DNS-OARC project. Participating root-server operators (and other DNS server operators) provide collections of compressed network traffic capture files. These captures are in a common format for network captures called PCAP that can be read by many different tools.

The root servers see queries for all sorts of DNS lookups, including many valid and invalid queries. The input dataset for 2012 is 5.21 TB compressed (for root servers A, C, E, F, H, I, J, K, L and M) and 2013 is 1.76 TB compressed (for root servers A, C, D, E, F, H, J, K, L and M). The 2012 data was captured between April 17th and April 19th, 2012. The 2013 data was captured between May 28th and May 30th 2013. Processing, decompressing and filtering these very large datasets takes considerable computing power. In order to make it easier for researchers and analysts to work with the data, it was decompressed, processed, filtered and converted to an easy to process form.

We used a tool with a long pedigree called "tcpdump" to process the PCAP files prior to filtration and conversion to intermediate forms. Tcpcap has been available since 1987 and is actively maintained to this day. Additionally, it is widely available for most platforms, including Linux, Mac, FreeBSD, Windows.

While decompressing and using tcpdump to convert the PCAP files, we created a collection of intermediate files that contain only the TLD strings of interest. The TLDs of interest included all applied for gTLDs and as well as a few other strings.

Subsequent to creation of the intermediate files, we produced per-TLD files. To create these, we aggregated the filtered intermediate files, and split them into one file per TLD. Each of these per-TLD files are sorted by SLD for easier subsequent analysis.

Appendix C: Discrepancies versus Interisle's report

While preparing data for analysis, a different set of tools were utilized than those used for the Interisle report. This was a conscious choice, as it allowed us to work towards reproducing Interisle's numbers without following the exact same methodology.

Interisle's report utilized a customized version of PacketQ to query the DITL data, whereas we used tcpdump and a series of data processing scripts. Because of the different tools and methodologies, we did encounter differences in our results, but are able to explain most of the differences.

We processed the data for 2013 and 2012 separately, and had managed to get our total query counts for 2013 within 1.25% after correcting for a few early processing errors. Such a small difference could have been explained by rounding errors³ and small differences in how PacketQ and tcpdump process data.

It wasn't until we examined the 2012 numbers and saw that our 2012 data was under-reporting by 21.21% that we discovered a bug in our data extraction and filtering phase: Invalid queries containing spaces were not included in our processed datasets! Fortunately, this only had a negligible effect on the processed 2013 data, as there were relatively few queries with spaces in 2013⁴. Including queries with spaces brought the 2013 query count total up 1.36% more queries than Interisle's report. The only TLD that was significantly impacted by this bug was .APP, which was under-counted by 327,000 invalid queries (20.44%).

The situation for 2012 was quite different as 2012 has a significant number of queries for "File moved-http://..." which contains spaces, as Interisle's report shows⁵, which they report made up about 18% of the 2012 data. We found there to be at least 168,778,000 or 22.3% queries with spaces in them in 2012. This brings our total for 2012 to 2.04% shy of Interisle's counts for 2012.

While investigating differences in how PacketQ and tcpdump process DNS packets, a couple of observations were found that may help explain differences. Due to limited time, we were not able to thoroughly investigate these. The key take-away is that the DITL captures contain a large volume of invalid or malformed DNS packets, which may be processed differently by different software. The tools, however, produce very similar numbers, if not the same, when processing properly formed, valid queries.

³ Interisle's report rounds figures to the nearest 1000, which can produce significant percentage differences when comparing small query volumes.

⁴ Interisle Consulting Group: *Name Collision in the DNS*, Table 10, Page 47.

⁵ Interisle Consulting Group: *Name Collision in the DNS*, Table 11, Page 47.

- Unless PacketQ is told not to limit queries to “questions”, if TCP queries are present (such as EDNS0), these may be included in query counts. This would have a very small effect of having PacketQ count more packets than tcpdump, which does not include the query string for TCP responses.
- When the PUSH flag is present on a query (TCP), PacketQ appeared not to count it, but tcpdump did report it. This too represented a small number of queries.

We are satisfied that both Interisle’s and our own processing of the DITL data are valid, as our datasets result in numbers that are acceptably similar. Given the completely different analysis toolset and large quantity of data and short timeline, it is not feasible to work to explain every little difference in the numbers. At the macro level, the results are sufficient identical, and validate each other.

Appendix D: Reserved Technical Labels

root
wpad
isatap
host
intranet
jpg
wsf
dns
lan
undefined
autodiscover
pop
smtp
gif
printserver
css
comm
imap
file
anonymous
sip
sipexternal
sipinternal
internet
xml
null
pop3
hotspot
html
router
internal
msdcs
udp
tcp

Appendix E: Reserving SLDs with over 10,000 Collisions

The following is the list of TLDs found to have at least one valid SLD with more than 10,000 collision occurrences in the 2013 DITL data set. We propose that each new TLD registry reserve all SLDs with more than 10,000 collisions for an extended period.

active	dish	legal	school
ads	doha	link	schule
africa	earth	live	search
amazon	eco	llc	security
anz	ecom	llp	services
aol	energy	lol	ses
app	ericsson	london	sex
apple	exchange	lpl	sfr
art	faith	ltd	show
auto	family	madrid	sina
baidu	farm	mail	site
bank	fashion	maison	sky
bar	fish	man	smart
bbc	flickr	management	sohu
bcn	foo	map	srt
beer	forum	matrix	star
bet	fox	med	stc
bing	free	media	studio
bio	gal	medical	style
blanco	game	meo	sydney
blog	games	mit	systems
bloomberg	global	mlb	taobao
bom	gmail	mnet	tata
boo	gmbh	mobile	tax
box	goo	moe	team
business	goog	msd	tech
bzh	google	music	telefonica
cal	green	navy	terra
cam	group	network	thai
caravan	health	new	top
care	here	news	toshiba
casa	home	nico	town
catholic	hospital	nyc	tube
cba	host	off	unicorn
center	hosting	office	vet
cisco	hot	one	video
city	hotmail	online	voyage
cloud	house	ooo	web
college	hsbc	orange	website
comcast	ibm	partners	weir
company	ice	philips	win
computer	ifm	photo	windows
corp	iinet	plus	work
cpa	ikano	porn	world
csc	imdb	prod	wow
data	inc	pub	xyz
dealer	ink	red	yahoo
delivery	institute	sap	yandex
dell	islam	sas	you
delta	itau	sbi	youtube
dev	kids	sbs	zone
digital	lanxess	sca	
directory	law	scb	

Appendix F: Suggested Reserved Brand Strings for .corp, .home and .mail

sap	ray	walbroem	gsf
compassgroup	luxottica	econcern	cerebos
adl	netserficos	h	kahramaa
sanm	smarttech	gateway	srv
hospira	petroplus	impaq	yout
main	intersil	apptis	lenovo
sealedair	umusic	banqueatlantique	cisco
worldnow	iasis	mobitv	abc
franke	wwt	thefa	hfc
abacus	ebx	stcolumba	carmignac
delta	telecomegypt	pmi	device
essilor	aeroflex	pvnccdsb	luxus
dci	phh	cfao	ceridian
davita	astra	markit	yandex
iusacell	seal	sea	xfab
astrium	bulgari	alrajhi	ragasa
advantech	mcfa	ziraat	twi
sungardas	arcelik	blooms	indofood
hologic	ahm	homeaway	chemeketa
google	rminfra	pulse	conres
ticketmaster	perlos	blessedtrinity	viagogo
directenergy	telekomaustria	asus	delicom
cencosud	youtube	itvplc	stallergenes
mediatek	netiq	arcsoft	dot
gmacr	you	acer	eset
yahoo	mobinil	medhost	intrado
playtech	firmex	jss	customink
uff	crucell	corona	china
blackbaud	investec	solmelia	crosig
checkfree	googl	wirelessadvocates	razer
lpl	grontmij	wsp	ascensionhealth
mgr	pdsi	ariad	aerolia
mapei	pmi	tereos	criteo
tomra	cabelas	rchk	tva
oldcastle	mexicana	taro	supermaxi
dunkinbrands	trader	navtech	asiapacific
nbtv	dell	skrivanek	chopard
skype	aol	adexus	bellsouth
iac	imtech	libyana	fosbel
tkse	amx	tipper	qiagen
rsag	qpass	mckoolsmith	healthcarefirst
lgdisplay	nomos	psy	docstoc
hager	kaynakholding	naes	savonagroup
albras	colombiamovil	publicisgroupe	sidlee
vodacom	iplgroup	zentiva	olivetti
bancolumbia	nas	altura	ahl
nmhg	twitter	localiza	rabobankgroep
bskyb	beer	fac	cartoys
galpenergia	freshdelmonte	groupalia	miniclip
kuoni	snagajob	goog	sodimac
networksolutions	xtralis	iamgold	taketwo
fnac	kordsa	sericol	mgmt
leviton	howdens	rtlgroup	mcap
ncsoft	muhaidib	telesat	ask
elcorteingles	jenoptik	dhlglobalmail	geusa
lan	oneneck	weightwatchers	enterasys
cnoc	startupfarms	hillstar	phones4u
webtrends	toshiba	shopzilla	fike
mauser	att	olysteel	sophos
sena	allseas	888holdings	sundaysky
nexant	kcadeutag	kinopolis	ziemann
dcl	unitedlex	max	twitte
facebook	sinopac	mechel	youtub
laerdal	bcferries	hti	fiorucci
masco	gowlings	mli	ccn

aldec	officel	burberry	varde
ibm	madcatz	bobevans	dolby
hudbay	premier	rencap	aviva
kadmon	telepizza	fitch	olympus
youtu	gmcr	spacex	asseco
sisd	bmw	asia	gpt
apple	draeger	awc	bsi
matrix	network	hot	pcs
ocia	m	uasc	azul
dallmayr	setup	btc	cbc
kbw	saturnus	childrens	boston
vitana	ascom	rasht	brother
kharkov	braemar	penfed	baltimore
millierthomson	cat	ergon	goo
idealease	gea	visanet	walpole
aaa	aglaia	kobo	atlanta
yorktowne	devlab	comcast	thun
heinlein	tensor	rai	icm
middle	porta	face	redmond
pri	secom	reliance	loc
bmwc	midam	sceggs	ice
pbi	aeci	newline	nemko
mre	skyguide	santanderde	trans
protransintl	deloitte	sjm	royal
cerner	gamesys	barentz	aurora
faceboo	sacmi	edpr	cowen
emergency	dys	baleno	iss
metro	domo	samsung	lol
intervision	anna	ferretti	cbn
vulcraft	greggs	siege	macintosh
symantec	meritz	live	canberra
jagex	hermes	wvc	bruehl
lancom	cci	scl	ebm
anexinet	softpro	unknown	orion
budenheim	tiscali	thepantry	privateer
bangkok	furukawa	rfid	sd45
ebay	acando	jebsen	jupiter
charter	greenergy	dior	game
pc6	ibri	estacio	parker
ldsb	abbi	csun	fortis
braves	unic	haesslo	dmz
ziprealty	happy	pago	bmc
foliofn	mobile	shc	giordano
faceb	corp	forrester	columbia
readynas	ecolab	v	ecobank
kstores	sungard	holdings	sirius
foseco	airbus	pioneer	aditi
ahly	sdl	sd33	csi
gcyc	quest	compaq	forum
swisslife	rackspace	twitt	lutron
ftt	thrivent	sam	belton
gogle	tsol	cassidian	mtu
newag	concentra	speedy	heartland
neon	hardie	ase	eller
one	zeppelin	grp	grace
imbema	presidio	efeu	acs
banvenez	ddsb	toyon	sony
longchamp	cardno	unisource	ali
jgl	areva	dcs	mars
box	sugar	monto	rts
cfglobal	abbott	scania	thornburg
euriware	itunes	london	dornier
depetris	baincapital	sun	stargate
pssea	tpg	oracle	europa
gmarket	unifi	onion	den
fundacion	ccs	daniel	theplanet
kiev	dev	gfk	cpwr
principal	mccain	goldentemple	kcg
sssas	microsoft	ico	eame
ppl	cima	bob	offshore
nexon	enersys	bbc	mbci

loe	wcs	bonfiglioli	tuv
uag	chipita	api	rabobank
auca	notebook	fleet	wacker
bax	bghs	bbva	life
sanmateocounty	sof	aero	vega
tpe	tesa	genting	amc
mobi	comp	eroglu	telos
attla	mcg	shuttle	kier
stc	turkmen	meritage	moreno
esa	tinsight	leman	ames
gome	pharos	selwyn	gsc
bcc	brm	mclagan	cohen
hhgp	bdsc	imi	naples
amorg	kfmc	nextel	wasco
cicc	ihl	ucles	galaxy
lcc	elan	cogent	indigo
obg	pc7	ensco	miel
lcs	calvo	chamartin	agi
cov	tmf	efg	bns
sov	hmc	img	alice
dtc	spgroup	lindner	cca
inet	ku6	harbourfront	rideau
bwin	hcb	zet	basler
afg	stora	tmk	xch
w	ult	empire	itt
gts	rica	verizon	boss
shg	efi	hsbc	ruth
cinapolis	cms	alex	chaos
rbi	elite	uanl	david
daisy	oxia	michelle	carlos
alexlee	ghelamco	free	toledo
ddrc	bjs	bou	jeeves
y	asd	nsw	infinity
gpm	lamadeleine	allied	dune
netech	optimum	uhs	zurich
songa	texasgas	payday	hrc
zone	wonga	mac	swift
sds	phe	noco	ultra
rjy	whiteways	palic	bally
groupe	msi	hildebrando	private
trekk	sedgman	hyundai	chapman
metito	ande	grupo	boardwalk
ssg	teva	stpaul	fenwick
mch	ini	aem	master
uwg	alico	cogema	trident
host	quanta	eci	watts
ebsi	oxygen	srilankan	smart
motech	hafele	coe	veolia
pgslp	easynet	gim	leighton
sbc	capita	sbs	red
insight	gva	john	adams
esker	company	serc	leo
vib	mobicom	cit	bfq
jcom	dfa	mondial	grey
ami	det	omnilife	mercury
dpa	office	hudson	space
phf	rcs	lena	claro
k	mig	magellan	mmc
carglass	applied	triton	blake
guckenheimer	asi	tsd	amer
lutz	vip	help	anadolu
synovis	macedo	msp	hughes
photo	ima	res	guilford
telemar	ams	uca	fox
hbi	ecs	apac	kingston
kit	connors	magna	orange
boosth	lins	nse	

Appendix G: Top 50 SLDs for .home, .corp and .mail

.home

intra
https
pro
tracker
br0
user
nohost
iphone
e
desktop
windows
dhcpcp0
admin
invalid
mail
images
computer
gmail
pc2
server1
lifbcibllhkdhoafpjfnlhfpfgn
pldf1
i
laptop
error
videos
activationbbr
n
b
servidor
xxx
icongo
s
namics
ieeb
dhcpcp1
a
ufi
hotmail
mybookworld
wdtvlive
ipad
com0
printer
d
user-hp
diskstation
u
php
bit

.mail

system
alico
com
net
yahoo
org
g
mail
company
hot
army
gateway
navy
google
www
receive
local
smtp
gmail
e
aol
hotmail
embarq
y
pop
rocket
rediff
corp
for
cra
professional
usmc
autodiscover
android
sazepad
usarmy
delete-me
imap
comcast
upc
jensen
abwin
att
live
gruppocredem
metro
win
border
company
oma

.corp

lasercard
csodsandbox
rel
broker
beauty
rosinv
amlaw
vfa
srggi
grupogq
domain
uafc
dorseylaw
orklanet
hymall
tatenergo
eisenmann
cvstarrco
dipcmi
csodmgmt
airwatch
cfs2
dealerdotcom
neos
247wpp
imax
tecsys
cegos
meus
raccorp
fpprod
buyabs
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