Afnic welcomes the opportunity to comment the recommendations made by JAS in their report, in order to mitigate the name collision risks.

As a back-end registry for 17 new gTLDs, and especially for the two new gTLDs .bzh and .paris, who repectively received lists of 2001 and 18767 blocked names http://newgtlds.icann.org/en/announcements-and-media/announcement-2-17nov13-en , Afnic welcomes the improvements brought by JAS in their report, but is still concerned by the methodology and the rationale used by ICANN to propose a “One Size Fits All” response to the name collision problem.

1. About the severity of the problem.

As JAS report states on the very beginning (page 1) and reiterates on several occasions later :

“We do not find that the addition of new Top Level Domains (TLDs) fundamentally or significantly increases or changes the risks associated with DNS namespace collisions.”

“Over the course of the study, JAS found no evidence to suggest that the security and stability of the global Internet DNS itself is at risk” (page 2)

Afnic commends ICANN dedication to the security and stability of the Internet, but wonders why, given the fact name collisions are reported to be a well-known threat and the blocked names list has been published since November 2013, there is still a need to block all these names for a period of 120 days after delegation of the TLD.

2. About the risk mitigation proposals

The proposal to block all the names considered risky, for a 120-day period of time, seems somehow arbitrary. There should be a clear path for registries to bring evidence they have already deployed risk mitigation plans on various names, thus allowing them to open these names for registration from the beginning of the launch process of their TLD. Out of several thousands of blocked names through the initial report, some names are of very high importance to the TLD, especially when they are related to important companies that could be interested to register their names.

In such a case, registries should be allowed to engage a specific mitigation plan that could be validated by ICANN, prior to the general availability of the TLD.

3. About ICANN responsibility to mitigate the risk

As JAS clearly expresses the need for ICANN to engage directly with system operators to ask them to comply with best practices and therefore to stop using internally TLDs that are delegated to the root zone, the requirements proposed to mitigate the collision risk are

almost exclusively made to the registries (the systems operators appear not to be sufficiently involved with their large share of mitigation). The list of blocked names published by ICANN in November should allow ICANN engaging, along with its customers (the registries) dialogue with ISPs and systems operators to track the queries made that lead to these lists, determine the sources they are originated from, and inform directly the operators that the TLD is going to be delegated.

If the blocked names lists are really relevant (and we still have some concerns about the methodology used to build them), we do not see other ways to really mitigate the name collision risk, and particularly do not see how uniformly applying a 120-day period to each new gTLD would significantly change the current situation, except the potential of dramatically weakening the new TLDs launch programs.

As for the detailed recommendation made in this report, Afnic would advise the following:

Recommendation 2: With regard to recommendation 2, Option 4 discusses about de-delegating the impacted TLD as a feasible option. We completely disagree that it is a feasible option, since research points out that name collisions are not a new phenomenon, and will not be mitigated definitely just by providing mitigation measures to the SLD list to be blocked, currently provided by ICANN for each new gTLDs. There are possibilities that collisions occur with new strings in the future. Hence, the possibility of de-delegating a gTLD by ICANN should be completely removed. Elaborating into the different options, it is not clear from the report who is the "impacted party"?. From our understanding, the impacted party could either be:

1. The gTLD registry under whom the name collision has occurred;
2. The SLD owner whose domain name is the cause of collision;
3. The end user who is impacted as the result of the name collision.

As per our knowledge doing our own research on name collisions, to mitigate it, it is important to identify the source of the collisions. In order to identify the end source, in most cases, the ISP's collaboration is important. In addition to disseminating information about the introduction of new gTLDs and the issues surrounding name collisions in the fora frequented by system operators, ICANN should be able to rope in major ISP's for real mitigation.

RECOMMENDATION 4: This should be ensured only as the last possible measure. ICANN should take into account the SLAs between the registry and the SLD, thus suddenly blocking a SLD could impact the registry economically. An example could be blocking a string in a “Pioneer list”. Rather, ICANN should help in all ways the registry to identify the source of name collisions and mitigate them.

RECOMMENDATION 5: Again, rather than ICANN forcing the registries to block the SLDs, ICANN should enable further research in possibly identifying the root cause and mitigating them. The best possible way for a short and medium term is for ICANN to help each registry is to have a process in schedule to mitigate name collision rather than just blocking the SLDs

Recommendation 6: The reason for the 120-day period for controlled interruption is not clearly explained in the report. If a registry is capable of demonstrating to ICANN that it has mitigated the name collision, the concerned SLD should be activated immediately. Contractual obligation vis-a-vis the registry and the SLD owner sometimes may not allow the registry to block the SLD for 120 days.

RECOMMENDATION 7: As recommended in the discussions in the collisions mailing list for a better visibility, instead of redirection to 127.0.53.53, ICANN should create a public web server which redirects all the name collisions related queries. The redirected query of course should be stripped of all sensitive data.

RECOMMENDATION 11: In addition to this recommendation, it would be recommended that ICANN rope in major ISPs to contribute to the public archive subjected to removing all information concerning privacy of the end user.