

## **United TLD Comment on the Study Titled “Mitigating the Risk of DNS Namespace Collisions”**

United TLD Holdco Ltd. (“United TLD”), trading as Rightside Registry, a registry for 21 new generic top level domain names (gTLDs), an applicant for 7 more gTLDs, as well as a back end registry services provider, thanks ICANN for the opportunity to comment on the study issued on 24 February 2014, titled *Mitigating the Risk of DNS Namespace Collisions*, produced by JAS Global Advisors. Although United TLD agrees with the findings of the study and generally supports the recommendations contained within this report, United TLD asks that ICANN consider a few changes with respect to implementation of the framework for risk mitigation.

### **.Home, .Corp, and .Mail**

United TLD recommends that a final decision on these strings be postponed until a more comprehensive technical evaluation can be performed and a solution may be developed to allow for these strings to operate in the DNS.

### **Controlled Interruption Period**

United TLD fully supports a fixed “controlled interruption” period and a clear end to the collision-related restrictions on the TLD. It is very important for all new gTLD registry operators to be able put an end date on the process and we look forward to being able to continue the rollout of our TLDs without the business uncertainties caused by this process.

However, United TLD recommends that ICANN drop the 120 day period to 60 days. While the extra 30 days doesn’t seem like much compared to the magnitude of delays the New gTLD Program has faced, a 60 day period will more closely match a typical 60 day Sunrise Period. Registries that have already established their gTLD launch plan would not further be delayed.

For TLDs that have yet to be delegated, we support Recommendation 6 and the publication of a controlled interruption zone as a measured and appropriate way of addressing name collision concerns. It would, as the study correctly points out, require ICANN to allow the wildcarding of a TLD.

### **Wildcarding Option**

United TLD also suggests that TLDs that have elected the “alternative path to delegation” also be allowed the option of wildcarding the TLD as a method of controlled interruption. Registries should be able to have both options available. This would effectively eliminate the issues with non-registered zone entries and likely be easier to manage for registry operators that would otherwise face the challenge of either artificially registering thousands of domains or manually adding entries to their zone files.

## **Emergency Response Options**

United TLD agrees with the study's recommendations that emergency response options should only be considered in cases where there is a clear and present danger to human life, rather than just "harm" and also supports the conclusion that de-delegation is not a valid response even in such case.

## **Publication of Appropriate Resource Records**

While United TLD recognizes the concerns about privacy and data leakage, we believe that ICANN should seriously consider using a valid public address that points to an informative web page rather than the 127.0.53.53 IP address for A records. We believe that, assuming the public IP only answers Port 80 requests, it would be much more effective to educate end-users than routing them to an internal IP which offers no ready feedback.

A fully delegated and "live" TLD operates under different conditions than an undelegated one. Simply adding A and SRV records for thousands of SLDs will trigger a number of ancillary effects throughout the broader industry. There are numerous services that monitor zone files and try to match registrant information through WHOIS and other data. Recommendation 7 will lead to a not-insubstantial amount of additional outreach and customer service incidents for the affected registries from 3<sup>rd</sup>-parties trying to understand why a given SLD doesn't have a registrant. We recommend that registries be encouraged to provide, when technically feasible, some level of feedback via WHOIS to further the efforts of both the technical outreach (Recommendation 2) and the specific entries of the controlled interruption zone.

## **Conclusion**

United TLD is pleased to see the concerns surrounding Name Collisions being addressed in a measured and thoughtful way. We believe ICANN should consider these recommendations but, ultimately and quickly, we urge ICANN to adopt the substantive recommendations of the study.

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