



Donuts Inc. Reply to Comments on JAS Study on Mitigating the Risk of DNS Namespace Collisions

April 21, 2014

Thank you for the opportunity to reply to comments to date regarding the JAS Study on Mitigating the Risk of DNS Namespace Collisions.

The collision issue has been fully examined and should be concluded without unreasonable penalty to those who applied for names not prohibited by the Applicant Guidebook (AGB). ICANN should take a dim view of overstatement of the collision problem as it has been propagated by parts of the community with a competitive interest in preventing certain gTLDs from reaching delegation.

As we said in our comment of March 31, 2014¹:

Donuts supports the expeditious closure of the name collision issue. We believe name collision is not the threat to the Internet's infrastructure in the manner in which it has been so negatively portrayed. There is no evidence that name collision is a threat either to Internet stability and security or to human life, as namespace collisions happen every day in hundreds of TLDs without harm, and it is an unnecessary burden to force new gTLD registry operators to implement mitigation efforts for a problem that scarcely exists.

It is unfortunate that name collision—so thoroughly studied earlier in the development of the new gTLD program and judged as at most a modest hypothetical problem—remains at issue in any capacity. Presumably, ICANN's inclusion of potentially problematic strings in the AGB (the contract between applicants and ICANN) reasonably relied on the examination of this issue by technical experts, and the resulting list of prohibited strings (for example, .LOCAL) was therefore exhaustive.

No collision difficulty to date

Since opening its first set of new gTLDs for Sunrise last November, Donuts has administered more than 600,000 domain name registrations. There have been no collision problems in any of these gTLDs; given the nature of the attention paid to the collision issue, it's something we carefully monitor.

However, *since merely the close of the past comment period on this matter*, Verisign has accepted more than three million registrations in .COM. It's a demonstrated fact that collision infects the .COM gTLD in an impactful way, yet it and other elements of the community not only refuse to address the existing problem, but insist on imposing mitigation strategies only on competitors and not on incumbents.

¹ <http://forum.icann.org/lists/comments-name-collision-26feb14/pdfUXuyww04b1.pdf>

.CORP, .HOME and .MAIL

Donuts disagrees again with comments that recommend these gTLDs be permanently prohibited. As noted in our previous comment:

It is premature to preclude altogether the existence of these three gTLDs. Nothing is gained by such an action and preventing an opportunity for study, coordination with the IETF, or other such prudent and reasonable examinations. Mitigation tactics are available to ensure the operation of these gTLDs in a manner that preserves their utility without permanently withholding them.

Donuts agrees with Uniregistry's comment of March 31²:

We strongly disagree with one aspect of the JAS report, which is that .HOME, .CORP and .MAIL should be permanently reserved. One of the primary purposes of the proposed mitigation plan is to educate users about the potential technical issues involved in private namespaces. Contrary to this purpose, permanent reservation of these three TLDs will perpetuate conduct that the rest of the mitigation plan is designed to cure.

Again, the ICANN Board is better advised to postpone any decision regarding .HOME, .CORP and .MAIL until the complete report is published, and provide a comment period for not only those strings, but potential other labels that could be used as local DNS spaces.

Verisign's comments

Regarding the comments of Verisign³:

Its comments, predictably, are very cautionary regarding name collision, and Donuts, overall, disagrees with Verisign's input on this issue. We do point out, however, that in places, the company's comments contradict themselves, and in this reply, highlight statements with which we do agree. For example, Verisign states that "The security, stability and resiliency of the DNS is one of ICANN's priorities, and rightly so. The Phase One Report confirms, as others have previously concluded, that these properties are not at risk due to name collisions related to new gTLDs."

Clearly, Donuts agrees. Taking this comment at its word, name collision should be put to rest and new gTLD registry operators should be relieved of the burden of mitigating an issue that causes no real harm.

Further into the comment, regarding "controlled interruption, Verisign states: "controlled interruption may break systems that are not at risk...protocols may break, causing some harm, including a loss of availability, one of the three pillars of information security." Donuts further agrees and believes ICANN must seriously consider the necessity of requiring a burdensome drain on registry resources—particularly one that quells competition in the namespace—in order to implement a solution that may do more harm than good over time.

We concur with Verisign's conclusion that controlled interruption on a "day in the life" list is not the best method for educating network operators about name collisions. Verisign says, "It's not practical for hundreds of new gTLD operators all to be contacting system administrators on their own." This is correct—ICANN, the Internet Engineering Task Force (IETF) and other authorities should make a

² <http://forum.icann.org/lists/comments-name-collision-26feb14/msg00011.html>

³ <http://forum.icann.org/lists/comments-name-collision-26feb14/pdfjLklhjc4.pdf>

concerted effort at community outreach to make network operators aware of the issue. It is a mistake to rely on controlled interruption alone to “educate” the engineering community.

Verisign’s recommendation to further restrict new gTLD registry operators, as follows, says: “For new gTLDs that have not already been delegated, where the controlled interruption would as currently specified apply to all SLDs, there are two options. The first option is, as in the previous case, that the new gTLD operator applies controlled interruption only to a defined subset of all SLDs—in effect, an SLD white list. As in the previous case, only those SLDs would be eligible to be delegated after the controlled interruption period, and the rest would have to be blocked. The second option is that the new gTLD operator applies controlled interruption to all SLDs except for a defined subset—in effect, an SLD black list. The new gTLD operator would commit to continue to block any SLDs on this “exclusion” list after the controlled interruption period, but could delegate everything else. “

We again agree with the rationale of not interrupting a business that’s already under way (that is, by putting the equivalent of a wildcard-with-exceptions in a production zone). We further reaffirm our position that because name collisions pose no real threat to life or Internet stability, name collision mitigation is an unnecessary burden unfairly placed on new gTLD registry operators as a method to limit competition in the domain space.

Donuts looks forward to the timely resolution of this matter.