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Via Email Only ([comments-name-collision-26feb14@icann.org](mailto:comments-name-collision-26feb14@icann.org))

Mr. Fadi Chehade  
President and CEO  
ICANN  
12025 Waterfront Drive  
Suite 300  
Los Angeles, CA 90094-2536

**Re: Request for Comments on Mitigating the Risk of DNS Namespace Collisions**

Dear Mr. Chehade:

Verizon appreciates the opportunity to comment on the report prepared by JAS Global Advisors (“JAS”) entitled “Mitigating the Risk of DNS Namespace Collisions – A Study on Namespace Collisions in the Global Internet DNS Namespace and a Framework for Risk Mitigation - Phase One Report” (the “Report”). Until a more comprehensive version of the Report is made publicly available, we can only provide preliminary comments.

We are pleased that JAS recognized the concerns about the new gTLDs .corp, .home and .mail, and we fully support JAS’ recommendation that all three gTLDs be permanently reserved. We are disappointed, however, that the Report fails to categorize the degree of risk and the actual consequences from potential domain name collisions in the remaining new gTLDs. The Report now wrongly assumes (except for .corp, .home and .mail) that all new gTLDs should proceed to delegation if they follow a 120-day “controlled interruption zone.” For registries that have chosen the “alternative path” to delegation, registries appear to only need to block the limited names for 120 days. The recommendation that no further collision-related restrictions be placed on any new gTLD operator after the 120-day window is not justifiable without a better understanding of the possible risks and consequences from domain name collisions.

We have a number of concerns about JAS’ controlled interruption recommendation as a means to address any likelihood of collision. JAS proposes a “120-day controlled interruption period” for new gTLDs that have not yet been delegated to the root zone, however, no reasoning is provided for the chosen 120-day period. We query if this 120-day period is sufficient both in time and in process to permit the affected end user to identify - much less remediate - collisions. Collisions that may potentially be harmful may not be identified until a particular second level string is registered months or even years after a TLD goes live. It appears that JAS recommends pushing much of the responsibility for dealing with the fallout from domain name collisions from ICANN,

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where the responsibility should reside, to the end user community, including businesses and likely, ISPs. We also disagree with JAS' assumption that the experiences of past new gTLDs launches (where a small number of slow and controlled introductions of well-vetted gTLDs) will necessarily mean there will not be significant incidents of domain name collisions from the introduction of enormous numbers of new gTLDs.

Introducing this new controlled interruption may not have an impact on user systems that would reveal a risk that could occur if and when a DNS query starts resolving in a "normal looking" manner. JAS' expectation that "[i]mplementation of controlled interruption... [i]nspires urgent remediation action" and "[i]s easy to implement and deterministic for all parties" is not necessarily true. A trial implementation of the 127.0.53.53 interruption already undertaken on one major domain receiving millions of misdirected collision-type queries has shown no evidence that query originators are taking any action as a result of being directed to that IP address. Additionally, some systems originating queries treat this internal redirection as no different from an NXdomain response, and continue to query other domains via their search list process.

We strongly disagree with any erroneous conclusions being drawn from JAS' research that name collisions should not present a major concern. JAS clearly notes the high risk of collision in the new gTLDs .corp, .home and .mail, but unfortunately seems hurried to dismiss any likelihood of risk in the remaining 1,400+ new gTLDs without fully investigating and accurately categorizing the degree of risk for each new gTLD. JAS' statement that "DNS namespace collisions can be viewed as a notification problem" is an unsupported assumption and should be further explained.

The report makes clear that ICANN should take no urgent action in response to any collisions, despite whatever harm results, unless there is "clear and present danger to human life." Clear and present danger to human life draws an arbitrary line unnecessarily high and fails to take into consideration what happens if significant financial and other harm results for global businesses and end users.

Should ICANN, per JAS' recommendation, continue efforts to make technical information available in fora frequented by system operators (e.g., network operations groups, system administration-related conferences, etc.) regarding the introduction of new gTLDs and the issues surrounding DNS namespace collisions, all such information must also be published, maintained, and easily accessible on ICANN's public website.

Finally, the notion that "most failure modes will be identified during a scheduled time and before a registration takes place," fails to take into account that identifying "most" failure modes may not be adequate when the collisions are measured in many billions.

Thank you for the opportunity to provide these comments. We look forward to providing further comments when a more comprehensive version of the Report is made publicly available.

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