

**NTAG Reply to Public Comments on “Mitigating the Risk of DNS Namespace Collision”**

The NTAG (New TLD Applicant Group), an interest group of the RySG (Registry Stakeholder Group) representing 98 applicants for new TLDs, respectfully presents the following reply to comments about the above mentioned report, a study (currently in draft) contracted by ICANN in order to create the “Namespace Collision Occurrence Framework” as specified in the new gTLD agreements.

We note that some public comments besides our own have been submitted during the determined time window, and we selected some that contained ideas we wish to provide reply comments on:

- 1 Suitability of 127.0.53.53 as controlled interruption response (Made by Aaron Beck, and Martin Levy)<sup>1</sup>

We note that although there is no consensus among our membership on where to use unreachable IP address or provisioning an Internet reachable honeypot, in the case that an unreachable address is used, we recommend sticking to 127.0.53.53.

The mentioned commenters proposed using other addresses than 127.0.53.53, either other IPv4 addresses or adding an IPv6 address. Following one comment<sup>2</sup> already in reply to the first one, we see two good reasons for the 127.0.53.53 response: (1) being in the range that minimizes traffic at all levels since it isn't not reaching any destination at the end (2) it is memorable enough that network administrators can easily search for it. We need to emphasize that for this to work there needs to be effective content and communication strategies mapping this search term to helpful Web pages. We also don't see a need to include IPv6 in the response set since IPv4 is expected to still be a working protocol for many years in the future, long after the Namespace Collision Framework provisions will expire.

- 2 Delay implementation to Phase 2 report (Made by Verisign)<sup>3</sup>

Commenter suggests that implementation should wait for Phase 2 of the namespace collisions report and any related public comment periods. This is unwarranted since Phase 2 is supposed to address the currently ongoing comment period and only include information that was delayed due to responsible security vulnerability disclosure that doesn't affect implementation of framework.

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<sup>1</sup> <http://forum.icann.org/lists/comments-name-collision-26feb14/msg00000.html> and <http://forum.icann.org/lists/comments-name-collision-26feb14/msg00003.html>

<sup>2</sup> <http://forum.icann.org/lists/comments-name-collision-26feb14/msg00002.html>

<sup>3</sup> <http://forum.icann.org/lists/comments-name-collision-26feb14/msg00010.html>

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#### 3 Controlled interruption ineffective to WPAD security issue (Made by Verisign)

NTAG reaffirms its suggestion of reservation of specific SLDs, including WPAD.<td>, to address this class of issues. From our original comment<sup>4</sup>: “Prevent registration of specific terms related to the Internet, networking, protocol, web related file extensions or common internal hostnames.”, with an specific list of suggestions in Appendix D.

#### 4 Controlled Interruption May Break Systems that Are Not at Risk (Made by Verisign)

We note that this comment goes to recognize the effectiveness of the controlled interruption period to address potential security risks, since it finds it even overreaching. We understand that there is a trade-off already taken into account from a public interest perspective that it might be better to alert users of possible issues before they could materialize instead of waiting until it actually becomes a threat.

#### 5 JAS Report does not categorize risk and consequences (Made by Verizon)<sup>5</sup>

Comment tries to apply closed systems information security doctrine to a public network connecting billions of devices like the Internet. As it applies to human health, where diagnosing and treating a single patient is different from public health initiatives, risk mitigation in a complex dynamic system and is done at a different level.

NTAG thanks the opportunity to provide replies to the aforementioned comments on this topic.

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<sup>4</sup> <http://forum.icann.org/lists/comments-name-collision-05aug13/pdf5yif3HTBGj.pdf>

<sup>5</sup> <http://forum.icann.org/lists/comments-name-collision-26feb14/msg00017.html>

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#### About the NTAG

The New TLD Applicant Group (NTAG) is an interest group formed under Article III.D. of the Charter of the gTLD Registries Stakeholder Group (RySG), which is a recognized entity within the Generic Names Supporting Organization (GNSO) of the Internet Corporation for Assigned Names and Numbers (ICANN).

The NTAG represents 98 new gTLD applicants as of April 2014. Together, NTAG members submitted over half of all new gTLD applications received by ICANN (994 total, representing US\$ 184M in application fees).

The primary role of the NTAG is to represent the interests of entities that applied for a new gTLD(s) in ICANN's 2012 gTLD round. The NTAG represents the views of its members to the RySG, the GNSO Council, the ICANN Board of Directors, and other influential bodies.

The guiding principles for the NTAG are fairness, openness, and transparency in all NTAG policies, practices, and operations. The service standards for leadership positions include impartiality, accountability, and conflicts of interest declarations. The behavioral expectations of all NTAG members include adhering to ICANN Bylaws and Policies and the RySG Charter; supporting the consensus model; treating others with dignity, respect, courtesy, and civility; listening attentively to understand others; acting with honesty, sincerity, and integrity; and maintaining community good standing.