China Organizational Name

Administration Center

Comments from CONAC regarding JAS's

Name Collision Mitigation Plan

China Organizational Name Administration Center (CONAC) appreciates the opportunity to comment on the report of *Mitigating the Risk of DNS Namespace Collisions*.

This letter of comments aims to invite ICANN, JAS Global Advisors as well as interested parties to pay special attention to the blocked SLDs under ".政务"(government and government affairs) and ".公益"(public interest) TLDs of the which the blocked SLDs actually do not constitute name collision.

In retrospect, in anticipation of the new gTLD program, CONAC launched a test bed for our two Chinese gTLDs in 2008. During the process, if the users did not use configured DNS with forwarding function by the domestic ISPs, the query of the test bed would be directed to the DNS root zone. That's the reason why 3112 and 2808 SLD names on the block list respectively under ".政务" and ". 公益" TLDs come out as domain

names of "name collision".

However, those blocked SLDs under ".政务" and ". 公益" should not be blocked because they do not constitute the "name collision". As it is defined in the study by Interisle Consulting Group[1], "[N]ame collision occurs when name resolution takes place in a semantic domain other than the one that was expected by a user. The cause of this might be that the user, who is expecting a name to be resolved within the Internet's semantic domain, is using a name resolver that is configured with another Top Level Domain (TLD) namespace that it can query locally, in addition to or perhaps instead of forwarding queries to the root servers configured with the Internet's IANA root", in other words, name collision is based on the premise that a domain name could be resolved in two different semantic domains and the user may be returned with unexpected results, however, in CONAC's case, any single SLD on the block list will be resolved to CONAC's DNS name servers which are under CONAC's sole operation and management. There are sufficient proofs for CONAC's sole management of these blocked SLDs.

1. All the blocked Chinese SLDs are beginning with geographic names of Chinese mainland, indicating the SLDs from China;

2. CONAC is exclusively authorized by Chinese Internet governing

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[1] https://www.icann.org/en/about/staff/security/ssr/name-collision-02aug13-en.pdf

authority to run test bed for ".政务" and ".公益" TLDs since 2008, which might be proven by the official documentation issued by Ministry of Industry and Information Technology.

3. All the blocked Chinese SLDs are related to the names of Chinese central or local government organs, or the names of the Chinese public institutions administered by the governments. It is not allowed and impossible for these government organs or government administered public institutions to use unofficially approved private DNS.

4. CONAC could provide necessary registration information for these SLDs to prove they are under sole management of CONAC.

Since the SLDs under CONAC's two TLDs do not constitute name collision, we find the current mitigation measures could hardly address our concerns. The report of *Mitigating the Risk of DNS Namespace Collisions* correctly points out that DNS namespace collision is a pervasive occurrence, which will not put the security and stability of the global Internet DNS itself at risk, however, Recommendation 7 of the report in specific --"registries publish appropriate A and SRV resource records for the labels in the ICANN 2LD Block List to the TLD's zone with the 127.0.53.53 address for a period of 120 days" is unnecessary and hard to be implemented by CONAC because the users of the blocked SLDs are important government and public interest related organizations, such as

the state council, and we could not impair the Chinese users' experience and interests.

Now Since CONAC has been officially authorized by ICANN as the registry for ".政务" and ".公益" TLDs, we will procedurally shut down the test bed and transit to the root zone without impairing the users' experience. But due to the inapplicable name collisions blocking to the two TLDs, we now could not even launch our TLDs delegated in last December.

CONAC wholly support ICANN's endeavors in maintaining the security and stability of the DNS system and eliminating potential security risks of name collision. But given the fact that the blocked SLDs under ".政务" and ". 公益" TLDs have no risk of resolving to different domain name servers , and thus no risk of name collision, we would strongly encourage ICANN and JAS to reconsider the actual situation of the ".政务" and ". 公益" TLDs, and to unlock the relevant secondary domains as early as possible so that we could make smooth transition from the current test bed to the root zone file, and launch our two TLDs at the earliest possible date.

Sincerely,

China Organizational Administration Center (CONAC)