08 Apr 2010

Draft High-Security TLD Program Concept

Please accept the following comments in response to the publication of the High Security Top-Level Domain (HSTLD) proposal. [1] Go Daddy reserves the right to future comments on this issue and our positions include, but are not necessarily limited to, the text herein.

General Comments

In the most general terms, Go Daddy supports the concept of a voluntary, high-security framework for new gTLD zones with the security responsibilities within the zone shared and coordinated by the Registry, participating Registrars, and registrants.

But we have numerous concerns about any "top-down," centralized attempts to foster such high-security zones. The most effective HSTLD is one that is open to innovation, valued by its intended end-users, and widely adopted as necessary for conducting commerce within that specific HSTLD.

Not within ICANN's Core Mission and Responsibilities

As with other efforts (Registration Abuse, Fast-Flux, etc.) we feel that the HSTLD concept lies outside of ICANN's core mission and responsibilities. Fraud and Abuse on the Internet are complex and dynamic problems, and ICANN's commitments to transparency and consensus policy development are, in many respects, incompatible with effective abuse mitigation and broader security efforts.

In its development of a detailed and prescriptive program for HSTLDs, ICANN may be selecting a preferred model at the expense of more effective alternatives. While DNS is an important component of a security-conscious Internet experience, it is not unique to gTLD zones. Equivalent programs may benefit high-security hosting providers, ISPs, and payment processors as well. A better approach may be to specify more abstract "rules of the road" for a HSTLD, and allow applicants and service providers to innovate and collaborate within this basic framework.

The Industry, not ICANN, Should Develop New Standards

The draft program has ICANN too involved in developing new standards and certifications for IT security, data integrity, procedure quality, and overall business operations. The cost and effort of authoring, publishing, enforcing, and updating these programs could dramatically increase the size and scope ICANN, and is completely unnecessary given the abundance of viable alternatives such as ISO

17799, ISO/IEC 27001, PCI-DSS, and others. A better approach would be for ICANN to provide a platform to bring together interested gTLD applicants and operators to collaborate with existing standards bodies and others in the industry to develop the HSTLD framework incorporating appropriate standards and programs already governing a given topic, practice, or business function.

Conclusion
We appreciate the efforts the HSTLD-AG but believe that the draft relies on ICANN to play a bigger role than necessary. ICANN should serve primarily a coordinating role in bringing together the interested and necessary parties to develop the program, and no role in its administration or enforcement.

Sincerely,
GoDaddy.com, Inc.

Tim Ruiz
Vice President
Corporate Development and Policy
GoDaddy.com, Inc.

1. http://www.icann.org/en/announcements/announcement-22feb10-en.htm