Afilias' Response to VeriSign's Inaccuracies

VeriSign's response to the .NET Request for Proposals (RFP) made a number of claims about Afilias' performance that are inaccurate. VeriSign did so particularly in regard to Afilias' support of the historic migration of .ORG from VeriSign to the Public Interest Registry (PIR), which contracted with Afilias for registry services.

Following are examples of these inaccurate statements along with the facts to set the record straight:

VeriSign Statement: "Empirical data on the .org transition shows that .org ran at high service levels for resolution and registration and was actively monitored while being managed by VeriSign. Today, the same cannot be said for the administration of .org post-transition."

The Facts:
The evidence shows that Afilias supports .ORG (and .INFO) at similar or higher service levels than VeriSign does for .COM and .NET.

- Data on the service levels for registration are reported in the Monthly Registry Operator Reports (SRS Outage). In 2004, .ORG has had roughly the same amount of total downtime as VeriSign reported for .NET and .COM (source: ICANN Registry Monthly Operator Reports for Jan-Oct 2004). Specifically:
  - .COM: 1678 minutes
  - .NET: 1678 minutes
  - .ORG: 1685 minutes
  - .INFO: 1329 minutes
- Afilias has improved the monitoring of the .ORG registry as part of its contract with PIR. Specifically, Afilias provides data on 25 performance indicators that PIR reports to ICANN each month, and these are subsequently made part of the public record. VeriSign continues to report on just 4 indicators for .COM and .NET. VeriSign does not disclose empirical data on its resolution services.

VeriSign Statement: "Experience has shown the numerous risks with the transition of a TLD. The .org transition from VeriSign to Afilias was riddled with problems and resulted in decreased competition in domain name services and severely degraded experience. These problems include:
* Chronic shared registration system (SRS) outages
* Limited transition time for extensible provisioning protocol (EPP) migration
* Launched with fewer registrars than incumbent supported.
Individually, these types of failures should not be accepted for .net; combined, they represent a near catastrophic service degradation of core Internet infrastructure."

The Facts:

- Afilias' experience in migrating the .ORG registry clearly shows that a transition between registry operators can be accomplished safely and securely. VeriSign's claims of any problems during the .ORG transition are unsubstantiated by any facts, and actually contradicted by the public record. As the letter from the CEO of PIR, Edward Viltz, to Paul Twomey states, "Afilias worked with PIR to deliver a pioneering transition of .ORG—the largest transition of a domain registry from one provider to another in the history of the Internet in a stable and secure manner. Most .ORG registrants were not even aware that any changes were taking place at the registry level, because the transition was handled so smoothly" (http://forum.icann.org/lists/net-rfp-afilias/msg00001.html).

- The .ORG registrant experience *improved* post-transition with Afilias due to faster resolution of names (from 12 hours to less than 5 minutes), real time WHOIS updates, and the EPP/thick benefits of improved security and easier WHOIS access to complete information.

- Contrary to resulting in decreased competition, Afilias has brought *increased* competition to the marketplace. With respect to .ORG, Afilias supported 100% of the transitioning registrars at the time of transition and now supports 150 registrars, about 20% more registrars than were supported by VeriSign. In addition, Afilias has proposed the most comprehensive and competitive pricing package for .NET. Total savings at the registry level are estimated at over $60,000,000 over the next six years versus current pricing.

Operator	Price (Assumed to include ICANN price)	Promotion (Includes ICANN price)	Transition Allowance
Afilias	**$4.00**	**$1.00** (new registrations thru 2005)	$.25/domain
VeriSign	$4.25	0	0
Core++	$5.25	0	0
DENIC	$5.40 (up to 2009)	0	0
Sentan	Information not public	Information not public	$.03-$.05/domain

- Afilias is the only registry provider that has transitioned a major domain from VeriSign to a new system, so Afilias is the only operator with the experience required to fully understand the risks involved. Afilias is also the only registry operator with experience upgrading from VeriSign's RRP implementation to a standards compliant EPP system. Similarly, Afilias is the only provider that has managed an upgrade from a thin to thick registry, and at the scale required.

VeriSign Statement: .org Whois: response times increased 10x

The Facts:

Afilias delivers thick WHOIS response times for .ORG in less than 0.8 seconds. VeriSign does not report metrics for its WHOIS response times and therefore claims about differences in the .ORG system are unsubstantiated.

In addition, it is important to note that retrieval times for thin verses thick WHOIS systems are fundamentally different. In a thin registry, a WHOIS response only contains information on the sponsoring registrar. Since VeriSign operates a thin registry (and proposes to continue doing so for .NET) this forces requestors to ALSO visit the registrar of record for a domain to obtain the contact information, thereby stretching the time until the desired information is received. Thick WHOIS systems respond not only with information on the domain name, but also with all contact information. In sum, the round trip time it takes for a user to retrieve contact information on a .ORG domain is now substantially *shorter* than the service formerly provided by VeriSign.

Furthermore, VeriSign's Customer Service verifies that VeriSign only updates WHOIS records at 12-hour intervals. This results in VeriSign's current .COM/.NET WHOIS providing continually out of date information. As noted in Afilias' proposal, this policy has serious ramifications, including enabling spammers, perpetrators of DDoS attacks and cybersquatters to avoid apprehension.

VeriSign's .NET application makes several other statements regarding Afilias that are similarly inaccurate. Afilias would be pleased to provide the Evaluation Team with the facts to demonstrate the fallacy of each such charge. Please do not hesitate to contact me if such material would prove helpful to completing a full and fair evaluation of each proposal.

Sincerely,

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