



Comments on ICANN's 2010-2013 Strategic Plan

The Coalition Against Domain Name Abuse (CADNA) very much appreciates the opportunity to provide comments on ICANN's Strategic Plan for 2010 through 2013. As an organization committed to a bottom-up, multi-stakeholder model, the consideration of opinions and comments from the Internet community is a vital part of ICANN's operation.

To begin, CADNA would like to express its support of ICANN's plan to work to improve DNS security. Many individuals and corporations rely heavily on the Internet for everything from socializing to conducting business, so ensuring security is one of the most basic and vital initiatives that ICANN must undertake going forward. However, in addition to the projects ICANN has outlined in its strategic plan—DNSSEC implementation and DNS CERT concept development—ICANN should have other important issues that would mitigate risks in the domain name space such as cybersquatting, phishing and malware covered in this plan opposed to such focus on new gTLDs.

To begin with, CADNA would like to offer comments on ICANN's goal to increase transparency. ICANN has historically come up short on transparency, and CADNA supports any adjustments the organization can make to be clearer about its processes and more accountable to its constituencies. CADNA would like to see additional opportunities for stakeholders to participate more directly in the actual development of future policies, an action that would help ICANN better comply with its bottom-up, multi-stakeholder mission.

While CADNA is generally in favor of the idea of establishing a process of regular community reviews of ICANN, it must emphasize how important it is that these reviews come from outside the ICANN organization. One of ICANN's biggest problems is the fact that it lacks the internal accountability mechanism found in most private not-for-profit organizations that ensures they are operating honestly. The only way to rectify this problem is for an independent body outside of the organization to review ICANN's processes and structure periodically.



One particular area that needs reviewing is the way in which ICANN incorporates the interests of various stakeholders into its decisions and policies. Up to this point, ICANN has been a captured regulator that primarily serves the interests of registrars and registries, which are the groups that stand to profit or lose from ICANN's policies and provide the majority of ICANN's revenue. This creates a major conflict of interest for the organization. Despite past claims, ICANN does not equally represent all of its stakeholders, least of all Internet users. CADNA hopes that in the years ahead, ICANN will acknowledge these issues and ultimately meet its objectives of improving accountability and incorporating more stakeholders into its processes and decisions.

With regards to ICANN's objective to promote competition and innovation that is beneficial to the public, CADNA wishes to point out that there is no convincing proof that the introduction of new gTLDs will be effective ways of promoting competition and innovation. In fact, the introduction of new gTLDs as the process currently stands could actually adversely affect the stability and safety of the Internet.

The expansion of the domain name space that will result from the implementation of gTLDs will inevitably create countless opportunities for malicious conduct. Bad actors will have a much broader pool of domain names to exploit through cybersquatting and typosquatting. Aside from brand and trademark infringement, IDNs and gTLDs could lead to increases in phishing, a harmful practice that has continued to grow and that has cost brands and Internet users millions of dollars. Additionally, it will be a huge challenge for ICANN to oversee all of the new registrars that will emerge; with ICANN's scalability currently in question, ICANN's continued march towards the expansion of the Internet should be halted until all major concerns are examined.

The Coalition Against Domain Name Abuse (CADNA) is a 501(c)(6) nonprofit organization dedicated to ending the systemic domain name abuses that plague the Internet today. For more information, please visit www.cadna.org.