ICANN staff proposal to mitigate name collision risks

ISPCP reply comments

The ISPCP wishes to supplement it's earlier comments by also providing these reply-comments responding to the following points that were made during the initial comment period.

Summary

We agree with the other respondents who point out that

- The staff proposal in unworkable
- Risks need to be better understood, and mitigated before new gTLDs enter the root
- A positive way forward would be to collaborate on a worldwide "prepare for new gTLDs" outreach program

1) *Daniel Karrenberg, Chief Scientist, RIPE NCC*

> "ICANN should neither mandate nor recommend that registry operators 'notify the point of contacts of IP addresses that issue DNS requests for an un-delegated TLD or names under it.' Such notifications will not be effective and pose a significant risk for abuse.
>
> "The notifications will not be effective because they will typically not reach the party that is potentially at risk."

We agree – the mechanism proposed by ICANN staff is not practical. The 30-day period proposed is not going to deliver warnings with sufficient notice for ISPs, connectivity providers and their downstream customers to;

- Identify, verify and assess the risk
- Determine what mitigation steps are needed, if any, and
- Develop and deploy changes that may be required

ISPs and connectivity providers will have an especially difficult time responding to the 30-day notifications that are being proposed, given that they provide recursive DNS services for very large numbers of customers and in many cases may only be one in a series of actors who will need to pass along such notifications.

We also agree with Mr. Karrenberg's points that these notifications pose abuse risks of their own, attacks aimed at both the originators and recipients of the notifications.

Our final point with regard to the staff proposal is that the arbitrary 80/20 divisions, based on wholly inadequate analysis, creates two kinds of errors. It wrongly puts some low-risk gTLDs in a "high risk" category and also incorrectly puts some high-risk gTLDs in a "low risk" category.

2) *Bret A. Fausett Counsel to Uniregistry, Corp.*

"Our proposal, is to continue to move forward with the current timeline, and include a trial delegation in an ICANN controlled environment with external observers. This will allow for additional traffic collection which would lead to a real assessment of the risks associated with the new TLD and to the implementation of reasonable measures to mitigate them."

Yasmin Omer, ARI Registry Services

"... it is imperative that facts, not hypotheses, form the foundation of these measures. At this point in the new gTLD program, it is critical that the fact finding process is both certain and predictable."

We agree with a number of commenters (Uniregistry, ARI Registry Services, and the drafters of the Interisle report to name a few) who point out the need to conduct assessments of the risks that are indicated, but not proven, given the nature of the Interisle study.

We also agree with the almost universal support across commenters for Mr. Faucett's point that where risks are identified, mitigation should be implemented. We would like to state our preference that these actions are taken as far in advance of the delegation of the new TLD as possible.

Risk mitigation efforts will be especially complicated for ISPs and connectivity providers because they will not only have to address risks internal to their own infrastructure, but may be also required to assist and guide their customers.

These efforts are all likely to be completely unfunded, non-revenue burdens that ISPs, connectivity providers and their customers will be asked to bear.

Substantial early warning will be of great value in those situations and may help avoid crude but effective measures (such as temporarily or permanently blocking a TLD, third-party DNS provider, or application-layer service-discovery provider) that may be required if failures happen unexpectedly.

3) *Keith Drazek, Verisign minority statement on NTAG name collision letter*

ICANN must accept responsibility for communicating the potential risks associated with name collisions. We believe this should

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include a significant outreach campaign to Internet
infrastructure and service providers (those who will receive
customer/consumer complaint calls) and to enterprises who serve
significant numbers of Internet consumers. Furthermore, in
addition to forewarning potentially impacted parties time and
resources must be allotted to enable them to mitigate issues that
may arise, the current proposals seem to wholly ignore this
necessity.
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We agree with Verisign, and several other respondents, that a positive way forward might be for all parties to collaborate on a worldwide outreach program aimed at improving the readiness and capability of network operators and their customers to identify and mitigate risks arising from various technical issues associated with new-gTLDs.

We propose the following objectives for such an outreach program;

- Minimize the impact of new-gTLD induced failures on; the DNS, private and public network infrastructure, and Internet users
- Make technical-community resources robust enough to respond effectively in the event of a new-gTLD induced disruption
- Maximize the speed, flexibility and effectiveness of response to any disruptions that do occur

We propose the following as a starting point for those wishing to collaborate on such an effort and would especially encourage those who benefit financially from the new gTLD program (ICANN, registries, registrars, etc.) to join us in this effort.

What we should be doing
Overall approach

Forming partnerships
- Sharing knowledge
- Identifying resources to share
- Making and maintaining contact

Assessing readiness
- Readiness tracking systems
- Ongoing conversations with key players
- Identifying risks and resources

Determining what we need to do to get ready
- Determining priorities
- Assisting planning efforts
- Developing coordinated plans

Preparing network administrators, large & small
- Training and outreach activities
- Acquiring and staging resources
- Identifying networks with special needs

Practicing responses
- "Community of interest" gatherings
- Checking signals between organizations
- Dry runs

Responding
- Identifying problems
- Delivering resources/solutions
- Coordinating efforts

Leading - managing - informing
- Project management
- Communications
- Leadership

We have developed an overview video, a draft presentation and a preliminary work plan that provides additional detail about the nature of the work to be done.   The URL pointing to those supporting materials is:

http://www.ispcp.info/policy-resources/proposal-a-get-ready-project-for-new-gtlds/