



Mr. Cyrus Namazi  
Internet Corporation for Assigned Names and Numbers  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536

RE: Solicitation of Community Comments on the Proposal to Mitigate Name Collision Risks

Dear Mr. Namazi:

Thank you for the opportunity to submit reply comments on this key issue impacting the Internet community.

In the earlier comment period, the Association of National Advertisers (ANA) urged ICANN to permit additional time to allow sufficient analysis of the very real potential harms from name collisions. As you know, the Interisle Consulting Group clearly stated in the "Name Collision in the DNS Report" (the "Study") that nearly all proposed new gTLDs carry some risk of name clash and potential service interruptions; the scope and potential harm from such collisions remain unclear.

Since filing our comments, we have seen that it is not just ANA that is concerned about this risk. Many entities also commented that additional information is essential to assess adequately the impact of name collisions. General Electric stated that ICANN should commission further studies on name collisions, including additional studies of traffic beyond the initial DITL sample, information and analysis of "use cases," and studies of the time and costs of mitigation. Verisign advocated the development of a more reliable risk matrix. The ISP and Connectivity Provider (ISPCP) constituency suggested that ICANN complete further study of name-collision issues to understand their nature and impact, based on the recommendations contained in the Study. The Intellectual Property Owners Association similarly recommended that additional time is required to evaluate potential clash issues and ICANN's risk mitigation proposal. Clearly these major Internet participants that represent numerous important entities all recognize – as ICANN apparently fails to do – that the name collision issue poses serious risks and requires thorough analysis to avoid negative impacts from premature gTLD deployment.

As we pointed out in our earlier comments, the Study is insufficient in part because it was a quantitative – rather than qualitative – analysis. The Study itself recognized that, "An additional qualitative analysis of the harms that might ensue from those collisions would be necessary to definitively establish the risk of delegating any particular string as a new TLD label" (pages 2-3 of the Study). ANA agrees that this qualitative analysis must be conducted. Without undertaking a thorough assessment and affording affected stakeholders additional time for analysis, ICANN and the Internet community will not have sufficient information to determine the potential negative effects of name collisions. We continue to believe that such clashes could

interrupt important public safety communications, government web traffic, e-commerce applications, and internal corporate communications.

ICANN has proposed to rank new gTLDs into three risk profiles, but without sufficient data to support these categorizations, the risk profiles will be merely ICANN's best guesses as to name collision potential and impact. Because they are merely estimates rather than determinations founded on solid qualitative data, these categories may well not ensure the security of the Internet, and therefore will undermine confidence among users.

Our member companies have informed us that they have begun the process of assessing the existence (and potential extent) of DNS collision issues, but new data must be compiled, and then analyzed. As these data and systems are complicated and detailed, even our most sophisticated members will require far longer than the six weeks permitted by ICANN for performing these assessments and then filing comments on its proposal. We would note that medium- and small-sized entities may have neither the resources nor in-house capabilities to perform the necessary analysis, and so would require even more time to ascertain the potential harm from name collisions.

At a minimum, we have suggested an extension of the comment period until November 1 and November 22 for reply comments. Though this timetable itself will be rigorous, it is the bare minimum required to compile sufficient information *before* ICANN takes action to roll out new gTLDs that may well have devastating effects on the stability and security of the Internet. We renew our request that ICANN recognize the complexity of these matters and the need for additional analysis in order to avoid very significant harm.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Daniel L. Jaffe". The signature is fluid and cursive, with the first name "Daniel" being the most prominent part.

Daniel L. Jaffe  
Group Executive Vice President, Government Relations