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†OF COUNSEL

Via Email to: comments-name-collision-05aug13@icann.org

Mr. Cyrus Namazi
Vice President, DNS Industry Engagements
Internet Corporation for Assigned Names and Numbers

RE: Comments on the Proposal to Mitigate Name Collision Risks

Dear Mr. Namazi:

On behalf of our clients (1) Central Valley Electric Cooperative, Inc., based in Artesia, New Mexico, (2) Farmers' Electric Cooperative, Inc., based in Clovis, New Mexico, (3) Lea County Electric Cooperative, Inc., based in Lovington, New Mexico, and (4) Roosevelt County Electric Cooperative, Inc. based in Portales, New Mexico (collectively, the Electric Cooperatives), we submit these comments on ICANN's proposal to mitigate the risks of allowing a large number of new generic Top-Level Domains (gTLDs) to become operational for use in the Internet domain name system beginning in 2014.

Each of the Electric Cooperatives is an incorporated, non-profit cooperative organized and operating under, and pursuant to, the laws of the State of New Mexico, and is owned and controlled by its members. Each of the Electric Cooperatives is engaged in the business of transmitting and distributing electric power and energy to retail customers within New Mexico and/or Texas. In addition, each of the Electric Cooperatives owns and operates facilities for the transmission, distribution, purchase and sale of electric power and energy at wholesale and retail, while Lea County also owns and operates facilities for the generation of electric power and energy.

In the short time the Electric Cooperatives have had to review ICANN's proposal, they have become concerned about the potential for the gTLD expansion to disrupt and compromise the security of not only their computer networks and communications systems, but also the infrastructure and facilities – such as power lines, switches, substations and transformers – used to transmit and distribute electricity throughout their service regions. Further, the Electric Cooperatives believe that it is not solely their four cooperatives that face this threat, but all of the electric utility industry and, indeed, potentially the entire energy sector throughout the United States.

Driving the Electric Cooperatives' concern is ICANN's proposal to allow use of large numbers of commonly-used terms as new gTLDs. The Electric Cooperatives do not believe ICANN has sufficiently studied the issues to determine the extent to which the new gTLDs will “collide” with pre-existing names that have been assigned to servers, routers, mobile devices and other equipment within the communication systems of entities, such as our clients, that play vital roles in generating and distributing electricity to industrial, commercial, residential and governmental users in all regions of the country.

The proposed names for the new gTLDs include many of interest to the electric utility industry, including some commonly used in internal servers, networks and devices. A few examples include **.transformer**, **.energy**, **.solar**, **.smart**, **.office**, **.company**, **.cloud**, **.mail**, **.lighting**, **.safety**, and **.webcam**, to name just a few. Many companies have already raised concerns about increased fraud, abuse and consumer confusion that will occur as a result of this rapid expansion. On top of these issues, new security concerns have recently come to light.

The Electric Cooperatives are concerned that this expansion of Internet addresses could compromise network security, by “tricking” common defenses such as firewalls and filters to mischaracterize externally-sourced emails and other Internet-based communications as having originated from within a private network and thus “safe,” even though they might not be. More seriously, the Electric Cooperatives are not aware of any preventative action ICANN has considered, much less implemented, to ensure that domain name “collision” does not have adverse effects on the reliability and security of electric transmission and distribution grids. The Electric Cooperatives' concerns are based, in part, on how extensively intertwined the electric grids are with computer systems that are in communication with the Internet.

For security reasons we do not feel it would be prudent to identify, in these public comments, which specific names and addresses our clients have assigned to the various devices and components in their communications and Internet-based systems. Suffice it to say, however, that the Electric Cooperatives have significant concerns that domain name collision could adversely affect the safety and reliability of the electric grids.

Assume, for example, that a device or server connects an electric utility's control room to a switch or circuit breaker on a 115 kilovolt transmission line, via a private internal communications network. Assume further that such utility has assigned the server controlling that switch or breaker an address that has “smart” in its name because there is some smart-grid

component on or served by the transmission line. The Electric Cooperatives are concerned that if the gTLD “.smart” goes operational, when the utility’s network attempts to send a signal to the server associated with the switch, there would be a significant risk that the signal will be misdirected out to external networks rather than arriving as intended at the server controlling the switch. That misdirection, in turn, could impair the utility’s ability to maintain proper control of the switch on that transmission line, thereby disrupting electricity flow.

The Electric Cooperatives have similar concerns with respect to other new gTLDs that may go operational next year, including **.home, .cloud, .mail and .company**, just to name a few. It is likely the case that one or more components of many entities’ private communications networks (such as a computer servers, routers or machine-to-machine devices) are internally labeled with the designation “home” or “cloud” or “mail” or “company.” To the extent ICANN allows gTLDs containing those designations to become operational gTLDs, electronic communications that, today, remain safely behind firewalls and inside internal networks could suddenly and inadvertently be misdirected to external networks and the Internet at large.

Given the seriousness of this issue, the Electric Cooperatives urge ICANN to delay the roll-out and implementation of the new gTLDs, so as to provide sufficient time to study the potential adverse impacts of new gTLDs on the safety and reliability of electric transmission and distribution grids.

We appreciate to provide comments on this important matter. Thank you in advance for your consideration of these comments.

Sincerely,



Eli D. Eilbott

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