August 27, 2013

To the ICANN Board:

We greatly appreciate ICANN's and the Interisle Consulting Group's extensive research and thoughtfulness in investigating and making recommendations on the name collisions in the DNS. We also appreciate ICANN's cautious consideration on the impact of releasing new gTLDs on Internet security, the extensive out-reach to the community, and the opportunity, as a non-applicant, to provide comments and the report. Although we disagree with some of the conclusions reached, we found the research and proposal both insightful and well thought-out.

We believe that delaying 20% of the new gTLD strings for further consideration is an unnecessary and overly cautious approach. Although we agree that some of strings need further evaluation, releasing many of the strings categorized as unknown risk will have little impact on Internet security. This overly cautious approach is a result of purely considering the number of potential gTLD collisions without factoring in the other information provided in the Interisle report. We believe that, when the additional data on certificates, SLD information, and total number of domains are considered, only a handful of strings truly need further consideration.

The data presented by Interisle reveals that corp and home account for almost all of the potential collisions at both the SLD and TLD levels. Of the remaining, only the top 30 have more than 1 million queries at the gTLD level.

If the total potential for collisions are evaluated, instead of purely evaluating gTLDs, then ice (21m), global (41m), ads (25m), mail (61m), google (651m), sap (20m), yahoo (65m), apple (34m), amazon (24m), sina (22m), baidu (70m), black (25m), and microsoft (160m) all stand out among the 20% as having a significant number of collisions at any level. Of these, google, sap, yahoo, apple, amazon, sina, baidu, and microsoft are all well-known trade names of organizations. Because all of the queries are likely related directly to the gTLD applicant and the applicant can likely easily remedy the potential for collisions by controlling the gTLD, these strings are considerably lower risk than the other strings.

This leaves ice, global, ads, mail, and black as higher risk strings. Of these, only black is not in the top 30 for gTLD occurances. If the information in Appendix C is weighed into consideration then corp, mail, ads, global, and home stand out as creating a significant risk for potential conflicts with other networks. Mail is especially concerning since it has the second highest number of certificates, which likely corresponds to a large number of internal networks and wide-spread use.

Based on our interpretation of the data, we agree with ICANN that corp and home are high risk. However, we believe this list should be expanded to potentially include mail considering the large number of internal networks using this name,

Of the remaining 20%, only ads and global stood out as having both a significant number of certificates and a significantly high potential for collisions. However, despite the low number of certificates, we believe that ice should be included in the unknown category since its potential for collisions at the gTLD level is high compared to other applicants.

We believe ICANN is taking an overly cautious, yet commendable, approach. Except for the six domains (corp, home, mail, ice, global, and ads) listed in this letter, the proposed strings present a low risk to security. Because this risk is low, we believe that ICANN may proceed processing the remaining applications and move forward towards approval.

Sincerely,

Jeremy Rowley
DigiCert, Inc.