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## COMMENTS OF GENERAL ELECTRIC COMPANY REGARDING ICANN'S PROPOSAL TO MITIGATE NAME COLLISION RISKS

General Electric Company (“GE”) appreciates the opportunity to comment on ICANN’s proposal to mitigate “name collision” risks.

GE is a highly diversified company, with many subsidiaries and divisions that depend on the security, stability, and resiliency of the Internet in myriad different ways. GE offers products and services that use the Internet to transmit critical, sensitive, and even life-saving information. GE’s entities also maintain a number of private networks. The issue of “name collisions” is thus of great interest to GE.

We appreciate the significant efforts of ICANN and the Security and Stability Advisory Committee (“SSAC”) to investigate these concerns and to engage the appropriate consultants and identify the necessary data sources to begin to understand the nature and extent of the “name collision” problem. We write now to comment on ICANN’s Proposal to Mitigate Name Collision Risks.

The Interisle Consulting Group (“Interisle”) report is preliminary in nature. By using a single “Day In The Life of the Internet” (“DITL”), the study by definition did not observe week-end, month-end, or other periodic or differentiated use patterns on the Internet. This limits the predictive capacity of the report significantly.

More importantly, the report was only able to study the *frequency* with which queries that could result in name collisions occurred during the DITL. The report did not examine the *severity of consequences* of any given name collision, a shortcoming acknowledged explicitly in the report. The report also takes pains not to state that any particular subset of the new gTLD strings is “low risk.”

The report states that for “policy” reasons, it would be “reasonable” to rely on “frequency” alone as a measure of risk. The report does not state that this is a valid conclusion with regard to security or stability – only “policy.” In fact, it is likely that the conclusion is not valid. A single name collision that risks a high-security network or critical communications system would be far more serious than frequent name collision impacting a low-risk network.

We believe ICANN should not rely on the “policy” decision made for methodological reasons in the Interisle report to set broader policy impacting future gTLDs. ICANN has proposed that all new gTLDs that appear in the query stream at the root less frequently than any existing TLD be classified as “low risk.” This proposal may have real and severe consequences.

The correlation between frequency and risk for any particular gTLD cannot be determined without additional contextual information. ICANN should endeavor to develop a more sophisticated risk model, and commission further studies on this subject. We believe three types of study are necessary for promulgating a rigorous and analytical system:

- Additional studies of traffic beyond the initial DITL sample,
- Information and analysis of “use cases” – particular types of queries and traffic – and the consequences of the failure of particular use cases to resolve as intended (particular use cases could have severe consequences even if they might occur infrequently – like hurricanes), and
- Studies of the time and costs of mitigation.

We note that a significant amount of the traffic studied appeared to involve VoIP (Voice over Internet Protocol) traffic – in other words, telephone calls. It is unlikely that ICANN can evaluate risk in a rigorous way prior to conducting “use case” and “severity of consequences” studies on the disruption of mission-critical VoIP communications.

GE also notes a lack of “user studies” generally. In other words, Internet traffic has been observed “in the lab” rather than “in the field.” GE is concerned about the possible effects of name collisions on GE, its subsidiaries and divisions, its vendors and distributors, and most importantly its millions of consumers and users worldwide. As a key technology provider into multiple segments constituting “critical infrastructure,” GE must treat online risk seriously.

We believe that appropriate and complete comments from GE and other large companies should include an assessment of this risk from these companies’ perspective. Unfortunately, the short comment periods provided for this issue make such a study unworkable. There is insufficient time to design, authorize, conduct and analyze even a pilot study. We intend to explore the feasibility and timing of such a study and may provide this information in further comments. At present, we can only conclude that GE’s risk from the delegation of any new gTLD is “unknown.”

We strongly urge ICANN to exercise due caution in this area, and to not delegate any gTLD for which there is any question regarding risk until that risk is fully understood.

Thank you for your consideration of these comments. If you have any questions or wish to discuss any of the points raised herein, please feel free to contact me at [kathryn.park@ge.com](mailto:kathryn.park@ge.com).

Sincerely yours,

