



UNITED STATES COUNCIL FOR INTERNATIONAL BUSINESS

17 September 2013

Mr. Cyrus Namazi
Vice President, DNS Industry Engagements
Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

RE: Request for Public Comment on the Proposal to Mitigate Name Collision Risks

Dear Mr. Namazi:

The US Council for International Business (USCIB), an organization that represents leading US ICT companies who are members of both the non-contracted and contracted houses of ICANN, welcomes ICANN's solicitation of public comments on ICANN's Proposal to Mitigate Name Collision Risks, issued on August 5. We understand that the *entire* 43 days of comment-and-reply period, may be used by the community to provide inputs, comments, and recommendations, and we have elected to do so before tonight's deadline given the critical importance of this issue.

USCIB supports measures to ensure a secure, stable, and resilient Domain Name System (DNS). We further recognize the potentially serious consequences of domain name collisions in the private networks of our Members. USCIB supports the conclusion of the Interisle Consulting Group (ICG) report that .HOME and .CORP, indeed, are "high risk," and should not be delegated until it can be demonstrated that the risk is low. Further, Internationalized Domain Names (IDN) were not listed in the Interisle report, confirming that no name collision issues exist with regard to certificates and DNS queries. As such, IDNs should be allowed to proceed through to delegation without requiring a delay.

Overall, however, we feel the ICG study does not provide sufficient analysis of risks to internal namespace posed by a broad range of new gTLDs. Thus, USCIB strongly urges ICANN to look at a series of community driven data-collection and analysis efforts and use this new data to better refine the analysis of risk and corresponding mitigation efforts.

Thank you for considering our comments on this important matter.

Sincerely yours,

Barbara P. Wanner
Vice President, ICT Policy