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To ICANN Board and Staff

Subject: Response to Call for Public Comment on the Interisle Consulting “Name Collision” Report

Dear ICANN Board and Staff,

This provides our comments on the Interisle Consulting “Name Collision” Report (“Report”).

Afilias is the ICANN Designated Registry Operator for .INFO, .MOBI and .PRO, and we provide technical services to support 5 other gTLDs and 9 ccTLDs, in total supporting over 20M names in the DNS. We have managed or supported the launches of 5 new gTLDs (INFO, MOBI, ASIA, XXX, POST), and 1 ccTLD (ME), experience we believe is equaled by no other provider. In addition, we are the applicant for 31 TLDs in the current round and provide the technical support for another 296 applications.

Since introducing INFO in 2001, Afilias has come to support more than half of all the volume of new TLDs worldwide, and has long supported expansion of TLDs in general as a means to increase competition and choice in the domain space. We have also strongly supported measures to ensure that TLDs are introduced in a stable and secure manner.

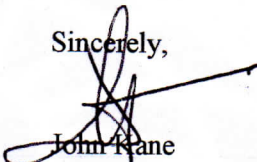
Afilias is a member of the NTAG, and generally supports the comments submitted by NTAG on September 17.

In addition to the NTAG comments, however, we wish to convey our opinion that the Report is materially incomplete in two ways:

1. The Report fails to accurately quantify the risks: We acknowledge that any new activity—especially when designed to “stimulate innovation”—will entail risk. The Report notes this obvious conclusion, but fails to quantify it in a manner that enables progress. We strongly urge ICANN to complete this work at the earliest possible date.
2. The Report fails to provide appropriate risk mitigation strategies: A workable mitigation strategy is needed to enable new TLDs to launch in a manner that does not jeopardize the stability and security of the Internet. We note that many of these risks existed during the launches of the 17 new TLDs introduced since 2001, yet the security and stability of the Internet was preserved. We believe that it is neither possible nor even desirable to attempt to expand choice with NO risk—such an attempt serves only to maintain the status quo. We strongly urge ICANN to quickly develop a mitigation strategy to address the major risks while accepting some risk as the price of progress.

ICANN has long been a positive force for innovation, choice and competition in the DNS. Afilias supports this work, and urges you now to quickly complete the risk assessment and mitigation work needed to realize the vision of further progress.

Sincerely,



John Kane  
Vice President

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