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September 17, 2013

VIA EMAIL ONLY (comments-name-collision-05aug13@icann.org)

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

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

Dear Mr. Namazi:

Verizon appreciates the opportunity to provide comments on the proposal to mitigate domain name collision risks arising from the impending delegation of new gTLDs. Identifying and mitigating domain name collision is an important issue that potentially affects a broad swath of global Internet users, including large and small businesses, governments and end users.

By way of background, Verizon previously requested that ICANN extend the current 21 day comment period which is expiring today to give stakeholders the time necessary to investigate the potential risks of collisions and provide meaningful comments to ICANN. Unfortunately, the deadline was not extended. Many ICANN stakeholders who could potentially be affected by this issue remain unaware of the risks or their need to take action. Delegation of new gTLDs into the root of the DNS of strings that are identical to names commonly used for internal network management by many of the world's communications and IT systems will cause security and stability problems unless ICANN takes immediate steps to analyze all new gTLD strings and identifies those that are likely to cause security and stability problems. Verizon urges ICANN to take all necessary steps to resolve this issue inside the multi-stakeholder process before the introduction of new gTLDs into the DNS and before any unintended consequences may occur in the marketplace.

We note that ICANN's fundamental fiduciary duty to the public, as articulated in Article 1 of the ICANN Bylaws is to protect and maintain the stability, security and reliability of the internet and, by extension, the DNS.¹

¹ Section 1. MISSION

The mission of The Internet Corporation for Assigned Names and Numbers ("ICANN") is to coordinate, at the overall level, the global Internet's systems of unique identifiers, and *in particular to ensure the stable and secure operation of the Internet's unique identifier systems.* ...

Section 2. CORE VALUES

In performing its mission, the following core values should guide the decisions and actions of ICANN:

1. Preserving and enhancing the operational stability, reliability, security, and global interoperability of the Internet. ...

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We commend ICANN for recognizing that domain name collision must be avoided to ensure the security and stability of the DNS. ICANN correctly followed on the work of its Security and Stability Advisory Committee (SSAC) by commissioning the Interisle Consulting Group study. In our view, the Interisle study is an excellent first step, but it also raises many additional critical questions and concerns that demand further in-depth study.

Based on the data in the Interisle study, we agree with ICANN's conclusion that the new strings .HOME and .CORP are "high risk" and should be placed on hold. We are concerned, however, that ICANN defers solely to its own applicants to make the case that they have mitigated the risk to an "acceptable level." ICANN should articulate specific, objective measurements to define what it means by "acceptable level." By any definition, "acceptable level" should mean that the risk of actual collision is extremely low. We also question ICANN's process of passing the burden exclusively to new gTLD applicants to provide such evidence. Individual applicants have a built-in bias and proprietary interest in owning exclusive rights to a particular gTLD. Many applicants may not be in the best position to determine the actual risk of collision arising from the global introduction of such a string. The concerns identified by the SSAC and the Interisle Study must therefore be addressed by ICANN itself – and not simply passed on to the applicants and operators of the proposed gTLDs.

We note that ICANN has apparently surmised from the Interisle study that 80% of the new gTLDs can be categorized as "low risk." We also have concerns with ICANN's designation of the remaining 20% of the new gTLDs as posing "uncalculated" risk. Despite ICANN's own label that the risk is "uncalculated," these new gTLDs are still proceeding toward delegation, albeit on a slightly slower rollout schedule than the "low risk" applications. In fact, the Interisle study supports no such labels or conclusions. We would urge ICANN not to conflate the frequency with which new gTLD string queries were observed in that study with corresponding levels of risk. In fact, the problem is not just with widely used and frequently queried proposed new gTLD strings like .CORP or .MAIL. The SSAC and Interisle have both made it clear that even those strings that have relatively small query volumes may actually present some of the highest risks if their existing private-network counterparts support critical infrastructure or services. ICANN must therefore understand which new gTLD strings present actual risks regardless of the number of times they are queried and look deeper to better understand the potential consequences arising from such collisions.

Finally, we have recently become aware of the study just released by Verisign which examined one of the new gTLDs applied for by the Commonwealth Bank of Australia for the string .CBA. The Verisign report showed that Commonwealth Bank of Australia at best controls 6% of the root server traffic associated with the .CBA string. The rest of the traffic, which, appears to come from many different types of servers and devices, presents numerous risks of collision, and originates from over 170 different countries. The .CBA string is not a name or acronym that one intuitively would think could result in collisions. But in a global environment, this study highlights that ICANN and its stakeholders need more qualitative data about the names global enterprises are already using for their internal servers, networks and devices. Many of these same enterprises might not even know about ICANN or the new gTLD launch. This study also supports our

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concern that ICANN should not rely solely on new gTLD applicants to provide evidence of “acceptable” risk.

In the critical days ahead, we urge ICANN to work with enterprise users of the DNS, with ISPs, who provide DNS services to both commercial and non-commercial users, with device and infrastructure companies, and with all other impacted parties, to review the collision-related stability and security impacts of *every new gTLD*. We strongly recommend that ICANN engage in further in-depth studies to understand not only the potential frequency of collisions, but to investigate where and why such collisions may occur and try to assess the consequences from such collisions. Only then, can an appropriate level of risk be assigned and the scope of possible remediation understood. We also urge ICANN to begin a separate global outreach and awareness campaign to educate all potentially affected Internet stakeholders about this issue. Ultimately, ICANN must be prepared to defer the introduction into the DNS of any new gTLD that the review identifies as presenting a threat of collision. These deferrals should remain in effect for each identified gTLD string until the threats related to that string can be substantially eliminated.

We look forward to supporting ICANN and working within the multi-stakeholder process to resolve this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah B. Deutsch". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Sarah B. Deutsch