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Gartner

17 September 2002

Mr. Stuart Lynn
President and CEO
ICANN
4676 Admiralty Way, Suite 330
Marina Del Rey, CA 90292

Engagement: 220329820
Re: .org Reassignment RFP Review

Dear Stuart:

The following letter and attachment provide Gartner's responses to the comments, issues and objections brought forth by the applicants following ICANN's posting of the .org reassignment RFP results on 19 August 2002.

In the following paragraphs we wish to address our objectivity and expertise as an organization, and comments do not pertain to a specific applicant. Individual responses to applicant questions are in the attachment.

Objectivity

The suggestion was made in some comments that Gartner's objectivity in evaluating NeuStar's proposal may have been compromised by a favorable piece about NeuStar previously published by Gartner's research organization. The research note in question played no role in our evaluation process and had no influence on the outcome of our review. Gartner prides itself on the integrity, objectivity and independence that we bring to every consulting engagement, and indeed those qualities are recognized as the hallmarks of our reputation throughout the world. We were asked by ICANN to advise it in this selection process precisely because of our reputation for independence and objectivity, as well as for our broad industry knowledge and depth of experience.

That said, our Gartner research organization publishes literally thousands of pieces a year on any number of IT issues and vendors, and from editorial, content and timing perspectives, operates with complete autonomy from our consulting organization.

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Indeed, over the years our research organization has published many pieces about other participants' bidders, including VeriSign and Microsoft. Our consulting team strictly complied with ICANN's request that rankings be based only on the information provided in each proposal. Our consultants did not research, review or consider any outside information about a bidder, whether such information was available from published Gartner research or from any other source. Gartner had no financial or other vested interest in ICANN's selection of NeuStar or any particular bidder in this process. We evaluated each proposal objectively and impartially, using the same approach and methodology in all cases.

Expertise

As an organization, Gartner is recognized and trusted throughout the world as the leader in IT advisory services. Our consulting organization is comprised of hundreds of consultants, who have a broad depth of experience and expertise in the full life cycle of IT projects, including strategy, procurement, contracting and implementation oversight. ICANN engaged the Gartner consulting organization, not any particular individuals, to advise it in this evaluation process. We assigned a team to this project that had the necessary experience and expertise to evaluate each proposal and to advise ICANN in a fair and objective manner.

Several applicants have raised concern regarding the "lack of complete" evaluation performed by Gartner within Criterion 11—"Completeness of Proposals" and the weighting Gartner placed on pricing. Regarding Criterion 11, as we stated in our report, our evaluation of Criterion 11 only reflects the completeness of the portions of the proposals Gartner was asked to evaluate. Other evaluation teams considered Criterion 11 reflective of the portions of the proposals they were asked to evaluate.

Regarding the perception of Gartner having a "less-than-comprehensive" emphasis on applicants' proposed price, our evaluation of price was reflective of the services and infrastructure proposed—not on the comprehensive value represented by the price. Other evaluation teams considered the price reflective of their evaluation criteria.

Gartner was extremely impressed with the overall quality of the applications received by ICANN. It is clear to us that more than one applicant is capable of operating the .org registry. In fact, we consider seven of the applicants to be fully capable of operating the registry in accordance with the requirements of ICANN. Of the four remaining

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candidates, we found no evidence that they would be unable to operate the .org registry. We just didn't find enough evidence presented within their proposals to demonstrate their capabilities.

We would also like to commend each of the applicants for the excellent work they put forth in preparing and presenting their proposals. Seldom do we see business plans, technology plans and community benefit plans prepared with such detail and insight. We only hope the diligence and effort we put forth in evaluating the proposals is worthy of your effort.

At the end of the selection process, only one applicant can be awarded the registry. The selection of this candidate is difficult in that it encompasses many factors that transcend technology. We are not envious of ICANN's responsibility.

Our report identifies the candidates we believe best meet the criteria we were asked to evaluate. But to be clear, we didn't feel that any candidate is perfect. We believe our efforts to identify areas of concern within the finalists are an essential contribution to the common good of the Internet. We thank each applicant for receiving our observations in a constructive manner.

We appreciate the opportunity to assist ICANN on this most important and challenging project.

Kind regards,

Mark Gilbert
Director, Gartner

cc: Louis Touton, ICANN
    Steven Buckley, Gartner
    Jamshid Lal, Gartner

Attachment

02 CONSULTING

ICANN

**A Report for
ICANN**

**.org Reassignment RFP Review—Responses
to Individual Applicant Questions**

17 September 2002
Engagement: 220329820

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Dot Org Foundation

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During the course of our initial evaluation we did not investigate the historical performance of the existing Registry operators. Our focus was on the material presented within the proposals.

During the course of our final evaluation we did consider the performance history of the operators as presented in response to our supplemental questions. Some score were adjusted appropriately. We rely on ICANN to come to the final conclusion regarding the experience and achievements of applicants by synthesizing our observations with other historical performance data that we may not have had access to.

2. Size and scope of existing registries.

Gartner acknowledges the additional detail provided regarding the ccTLDs currently operated by Registry Advantage.

Although Gartner noted that quantity of names in the Registry Advantage Registries is on the "relatively diminutive side of experience as compared to the other top applicants"; Gartner did consider Registry Advantage to be experienced in the operation of a Registry (for example, the operation of a SRS, Registry – Registrar relationships, etc…)

Furthermore, we agree that running a large Registrar system does provide substantial experience that is directly applicable to the operation of a Registry. We highly regarded the experience applicants demonstrated through the operation of a DNS, Whois service and the thick database Registrar systems. We did consider the fact that Register.com is currently supporting over 3.4M names.

Between the demonstrated ability to operate an SRS database, and the demonstrated ability to operate the DNS, Whois service and a thick database, we are of the opinion that you have clearly demonstrated the capability to operate the .org Registry.

3. Firewall security.

The applicant's score for security was based on a substantial number of factors, of which firewall architecture was only a single factor. The overall impact on the score assigned for security, as the result of the use of single firewall architecture, was less than significant. Of greater impact on the evaluation of security was the statement "Generally speaking, positive identification is required of all personnel entering or exiting the facility". Gartner has a lack of comfort with terms such as "generally speaking" when dealing with security.

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4. Redundancy at the secondary site.

After further consideration we believe Registry Advantage is correct in their comment regarding Registry Advantage having provided a level of redundancy between the primary and secondary SRS sites comparable to the other leading applicants. Gartner will revise the scoring to reflect this fact.

Regarding the suggestion Gartner "fails to appreciate the extent of redundancy at the primary site" Our evaluation did note "The data centers included a high availability design using server clustering, storage arrays, and load balancing." We felt our observance of this fact represented our appreciation for the level of proposed redundancy.

5. "Unknown issues" raised by using Tokyo as the secondary site location."

Our comment regarding "unknown issues" is just that—an observation there may be unknown issues regarding locating the backup data center in Tokyo that are beyond the scope of our evaluation. Examples of "unknown issues" are as follows:

- The worst case scenario of a primary site failure at a peak operating time of 1200 EST and 0100 Tokyo time are not addressed. The operational issues associated with the transfer of operations are not addressed in the application and therefore "unknown at this time."

- The language challenges associated with the inter-management of the primary and secondary site are "unknown" and not addressed in the application. It may be that both staffs are completely bilingual and are capable of handling any situations that may arise. We just don't know.

Please note that although Gartner has raised the issue of "unknown issues," we did not adversely score the proposal as a result. Furthermore, we readily acknowledge the merit of siting the secondary data center in a geographically diverse location. Please also note that we do not—in any way—suggest that Tokyo is an inappropriate location for the secondary SRS data center. We only suggest ICANN be aware of the possibility of an unknown risk and the potential need to further investigate, quantify, and possibly mitigate the risk should the DotOrg Foundation be awarded the .org registry operations.

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6. Customer service languages.

In our dealings with ICANN, our review of the RFP, background information and the mission of the .org gTLD; we have consistently observed a strong requirement to support international .org registrars and .org registrants. As such, our evaluation of applicants included investigation of explicit commitments to the support of multiple languages in written and verbal forms and the availability of support over multiple time zones.

Although we noted the applicant's commitment to the support of "multiple languages" and 7/24/365 support, we also noted the lack of material detail regarding multinational support.

7. Operations testing environment.

We agree with the applicant's observation. Our transition evaluation team did note the use of an OT&E but our technical team did not find any detail regarding the OT&E equipment within the response to question C17. The technical score will be adjusted to reflect the presence of an OT&E.

8. VeriSign roles and responsibilities in the transition.

No response needed.

9. Relevant operational experience.

The applicant is correct in their observance of the relatively strong weighting Gartner placed on Registry operations experience in our evaluation of the applications. It is Gartner's opinion that a significant predictor of future performance is past performance. We also believe that the detailed functional requirements for the operation of a Registry are primarily learned through experience.

During our evaluation of an applicant's experience we did not perform a detailed investigation into the past performance of Registries referenced by applicants. We only evaluated the information presented within the application.

Generally speaking, we believe the problems referred to in your comments were the result of "land rushes" on the new gTLD names. We believe .org will not experience traffic bursts attributable to land rushes. However, we do expect the registry to continue to experience traffic bursts attributable to "add storms" for desirable names that become re-available. As a result of our evaluation, we believe the top-rated applicants are all capable of handling the forecasted traffic loads without sustained violation of the Service Level Agreements.

We agree with the observation regarding the need for scalability of systems. During our evaluation we closely assessed the ability of an applicant to scale their systems to meet forecasted predicted and unpredicted demand/ scaling. We are confident that the top-

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rated applicants have the ability to scale their systems successfully to meet the needs of the .org registry.

We agree with the observations regarding the need for the Registry operator to handle add storms. However, we did not, as you suggest, use experience as the criterion for evaluating an applicant's ability to handle an add storm. We chose instead to use infrastructure scalability, provisioned and peak capacities, and estimated transaction per second performance as the basis of evaluating the applicants' capability to handle an add storm or other peak traffic loads. We also, where applicable, evaluated the presence of rate limiting equipment, or other traffic management tools, in the event the systems are unable to handle peak traffic requirements. Although Gartner cannot predict the size and scale of future add storms, we believe the applicants rated by Gartner at above average and higher are best capable of handling expected add storms.

Finally, we believe we did consider Registrar experience in our evaluation of applicants' experience. We consider a Registrar's experience operating a thick database, providing DNS and Whois services, to be a valuable – and directly applicable – experience for consideration in the evaluation of an applicant's capability to operate a Registry.

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Global.Name Registry

Our comments are in response to the section entitled "Flaws in the Evaluation Process and Preliminary Report, Gartner, Inc."

1. Previous familiarity with NeuStar systems.

This issue was addressed in our cover letter to this document.

2. Criterion 1—stability of the .org Registry: capacity.

We agree with the observation regarding our error in stating "the proposal included no discussion of capacity, volume or response time." The scoring will be reviewed and adjusted if found to be in error.

Regarding the estimates of queries provided, there appears to be many different perceptions of the number of DNS queries the .org registry will generate. In your comments you estimate the number of queries for .org DNS services to be 7k per second. This estimate was derived by prorating the queries received by the .org, .net, .com constellation based on .org having 8% of the constellation's names. For a number of reasons, we believe that 7k queries are an appropriate estimate for the high-end of the average load range. We believe the lower end can be established at 5% based on the gTLD constellation summary information provided by UIA. As a result, we believe the estimated load ranges from 4k to 7k queries per second.

We respectfully disagree with the observation regarding "Gartner appears to overlook" DNS queries requirements in other vendors. Our key concerns in our evaluation are:

1. Did the applicant propose equipment that could handle the number of queries in accordance with our estimated range?
2. Did the applicant propose a scalable solution that could quickly adjust to the actual query load?
3. Did the applicant commit to meeting the service-level agreements (SLAs) associated with DNS?

We believe each of the recommended applicants meets this test.

Regarding the pooling of DNS services, we believe the pooling of DNS services pools the overall risks of failure of the DNS constellation associated with any single DNS failure thereby reducing the overall risk to the constellation. We disagree with the assertion that pooling increases the risk to .org.

Finally, Gartner believes the reliance on enforceable SLA performance monitoring will assist in managing the provider to meet DNS query response performance regardless of

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the actual query load. We refer the applicant to Appendix D of the Model .org Registry Agreement.

> 4.1.2 <u>Performance Level</u>. At any time, each nameserver (including a cluster of nameservers addressed at a shared IP address) MUST be able to handle a load of queries for DNS data that is three times the measured daily peak (averaged over the Monthly Time Frame) of such requests on the most loaded nameserver.

3. *Criterion 7—type/quality/cost of Registry services.*

Gartner established the weighting for each of the criterion based on our overall interpretation of their intent and importance. We prepared the weighting objectively based on the available documentation and the mapping of the RFP questions to the criteria.

Also refer to our comment with respect to pricing in our cover letter.

The proposed pricing (questions C25, C26 and C27) were included in the evaluation of Criterion 7—refer page 8 of the Gartner .org Reassignment—RFP Review.

4. *Outsourcing.*

Regarding our having "taken issue with the fact that the .name registry is 'partially outsourced' and that we run a 'mirrored registry'."

Our concerns regarding partial outsourcing reflected our uncertainty regarding the amount of experience GNR has in the operations of specific sub-elements of a Registry. During our evaluation we closely examined the direct experience of the entities proposed to ascertain the amount and extent of their experience in sub-elements of a Registry (e.g., SRS database, EPP, DNS, Whois, etc.). In the case of GNR we were unable to completely identify your sub-element experience. As a result, we raised a concern regarding the possibility that a key sub-element of the .name Registry was outsourced and that the experience of operating that sub-element was not present in the .org proposal. This uncertainty was removed by GNR in your response to supplemental question #6:

> "Current operation of the .name SRS is divided into two segments: (1) SRS governing registrar interactions, and (2) SRS governing fulfillment services, including DNS, Whois, and MX, as well as consistency validation, backup, reporting, billing and zone file access, among other components. VeriSign operates the former segment based on Global Name Registry specifications pursuant to an agreement of limited duration signed in 2001; Global Name Registry operates and controls the latter segment."

This statement, along with other supplemental information, removed our uncertainty, but not our concern, regarding the operation of sub-elements of the .name Registry.

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Although our uncertainty was removed, we do have concerns regarding the fact that the GNR .org proposal does not include a participant directly experienced in the operation of a "SRS governing registrar interactions". Our final scoring has been adjusted to remove the uncertainty and to reflect the supplemental information.

We have no intrinsic concerns with regards to applicant's proposed use of outsourced service providers.

5. Experience.

In our supplemental questions we asked the applicants for additional data regarding their experience. Our findings were incorporated into the revised scoring.

6. Size of Registry.

In our evaluation we state GNR "could be considered to have *comparatively* low numbers of registrations" (italics added). We believe this statement holds true. However, we do agree with the observation that the operation of a Registry, no matter how large, is a valuable experience that should be considered in the evaluation.

7. Backup data centers.

We reviewed the references cited. Although we have no doubt a backup data center was proposed, we still have difficulty understanding the specific capabilities of the backup site even after reviewing the references.

8. Documentation of database.

Detailed documentation of the database was not a required response for the RFP. However, Gartner took note of the detail provided by GNR in their application, evaluated the structure, and scored GNR highly as compared to other applicants. Following a review of GNR's scoring in both absolute and comparative terms, we see no justification to modify our original scores.

9. Compliance with specifications.

Regarding the opinion that ISOC didn't answer RFP Question C17.12 appropriately, the RFP question is as follows:

> C17.12. Compliance with specifications. Describe the extent of proposed compliance with technical specifications, including compliance with at least the following RFCs: 954, 1034, 1035, 1101, 2181, 2182.

Our interpretation of ISOC's bid includes compliance with:

- NICNAME/WHOIS [RFC-954]—as stated in page 120 of the ISOC application.

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And the remaining DNS RFC's—as implied by the statement "In addition to supporting the standard DNS specification…" found in page 121 of the ISOC application.

Please note, we did not perform an in depth standards compliance investigation.

Regarding the use of a non-BIND proprietary protocol for incremental zone transfers (IXFR), we note IXFR is documented in RFC 1995 and that BIND9 is not specified within this RFC. Although Afilias is proposing the use of a non-BIND proprietary protocol, we believe the protocol will perform incremental zone updates in accordance with the objectives of ICANN. Furthermore, the method used for IXFR has been previously reviewed by ICANN and found to be acceptable.

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IMS

Regarding comments observing a difference of opinion regarding "technical due diligence." We agree, the investigation of technical due diligence can be performed at several levels. Our evaluation investigated technical due diligence from the higher perspective of the ability to operate the Registry. This due diligence included investigation of the data center architecture, systems, experience, to name a few. The investigation of software code was not part of our diligence.

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ISOC

1. Perceived differences in SLA commitments in C17.13 and C28.

The clarification of the SLA commitment is noted. The score for this criterion will be adjusted.

2. SRS failover time and performance of the secondary data center.

We recognize the comments submitted regarding the SRS failover time and performance of the secondary data center submitted in response to Gartner report that stated:

> "No SRS failover time was provided. Furthermore, the proposal includes the statement that "The secondary data center may perform at a degraded level""

We note, page 135 of the ISOC proposal states "In the event that the primary data server failed, there would need to be a brief interruption in service, while data processing moved to the backup data server."

The level, extent and duration of the degradation, or "brief interruption in service," was not stated. We continue to advise ICANN that this issue warrants additional investigation to determine the potential risk to operations should ISOC be awarded the registry.

3. SRS database architecture.

With all due respect, Gartner considers the drawings duplicated within your comments to be reflective of a "technology architecture" (nodes and links within a network).

Our Advisory recommendation to ICANN stated our concern that ISOC "provided very little information on the database architecture". Almost all other applicants proposed well known database products that have well publicized data regarding technical performance. This information was not provided or referenced within the original ISOC proposal.

We did review material that was provided in response to supplemental questions. Although the supplemental information did provide a lot of missing detail, we are still uncertain as to the ability of PostgreSQL to meet the forecasted performance requirements of a thick database the size of the .org registry. Regardless, for the purposes of evaluation, we will assume PostgreSQL will operate appropriately.

Following our review of the supplemental information we have concerns regarding; the potential difficulty of transitioning from the Oracle database used by VeriSign. We have concerns regarding the fact that the .org Registry will be the largest mission-critical

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deployment of PostgreSQL. And finally, we have concerns regarding potential issues of support as the unique demands of the .org Registry potentially evolve Afilias' deployment PostgreSQL away from mainstream users. These concerns will be reflected in our final Advisory.

Our recommendation to ICANN still stands; we recommend the proposed use of PostgreSQL in the SRS database architecture be reviewed with regards to potential risks in its ability to scale, replicate, mirror, cluster, perform application processing, and it's on-line/off-line maintenance capabilities in accordance with the high-availability and scalability requirements of the .org registry. Our concern should be interpreted to reflect what we believe is a manageable risk - a risk that can be managed through frequent monitoring of database performance and mitigated – if required - through the deployment of an alternative technology.

4. Staffing and training plans for the .org transition.

Gartner thanks ISOC for providing clarification on the staffing and training plans. ISOC scored well in this area, and though Afilias can step up to the technical tasks, there will need to be staffing and training for the personnel hired to staff PIR. The scores reflect this shortcoming; no changes to the scoring are needed.

5. PIR vs. Afilias roles.

Gartner thanks ISOC for providing clarification on the PIR vs. Afilias roles. The information provided helps clarify the activities of each party. However, it does not change an already good score in the transition to Criterion 9.

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NeuStar

2.1.1.1. Incorrect evaluation of NeuStar's experience and services.

Our evaluation of experience included the experience of companies presented within the proposal as being responsible for the performance of Registry sub-responsibilities. In the case of ISOC, we evaluated Afilias and others —not just PIR.

We reviewed the information provided within the responses to supplemental question #10. We will revise our Advisory to omit reference to NeuStar's experience.

2.1.1.2. NeuStar does provide an OT&E environment.

We agree with the observation. Our transition evaluation team did note the use of an RRP OT&E, but our technical team did not find any detail regarding the deployment of an EPP OT&E equipment within the technical sections of the proposal. The technical score will be adjusted to reflect the presence of an RRP OT&E.

2.2.1.1. Evaluation of this criterion omitted critical proposal sections related to stability.

We agree with the observation that "without a solid and workable transition plan, a registry operator will not be able to successfully complete the transition phase and will spend undue resources solving problems generated by the flawed transition." However, for the purposes of the evaluation, the transition issues were clearly defined by ICANN as belonging to Criterion 9 as articulated in the "Reassignment of .org Top-Level Domain: Criteria for Assessing Proposals."

2.2.2.1. Criterion 7—low cost + highest quality = best value.

Gartner thanks Neustar for providing an interesting formula with which to score Criterion 7. However, that is not how the RFP is written, nor is that how Criterion 7 maps to the questions. Each criterion was scored based on the questions mapped to it.

2.2.3.1. Criterion 8—Gartner incorrectly interpreted a dual-protocol environment as a benefit to the community, rather than a fundamental threat to the stability of .org.

We respect the extent of experience NeuStar has as a result of the transition of the .us ccTLD and its operation using EPP vr. 04. However, we respectfully submit that there is more than one way to transition from RRP to EPP. Each strategic alternative has risks and benefits.

We believe NeuStar did an excellent job of articulating the tactical risks and benefits associated with their transition plan and we scored it accordingly. We also believe others did an excellent job of articulating the tactical risks and benefits associated with alternative strategic approaches to the transition.

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2.2.3.2. Gartner also omitted credit for NeuStar's fluency over other applicants when it came to the SRS protocol.

We did not perform a comparative analysis of EPP experience. However, we believe our report and scoring adequately recognized NeuStar's experience with the EPP protocol.

2.2.4.1. Criterion 9—transition considerations: Gartner's evaluation overlooked the inherent risk of some bidders' transition solutions.

We refer you to our previous response to 2.2.3.1.

2.2.5.1. Criterion 11—Completeness of proposals: ICANN staff omitted Gartner's evaluation of Criterion 11.

We provided our individual score for Criterion 11 as it exclusively relates to Criteria 1, 7, 8 and 9. We leave it to ICANN to incorporate our score with the Criterion 11 scores established reflective of the remaining criteria and apply it as needed.

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.Org Foundation

1. Response to issues raised within the .Org Foundation cover letter.

In the cover letter prepared by Mr. Drayton he cites two concerns regarding the Gartner report. First, that Gartner did not recognize the .Org Foundation had proposed the use of real-time updating of Zone files and the Whois database. Second, that our ranking of UIA as fourth overall in our evaluation "calls into question our objectivity." .Org Foundation restated the first question within their Detailed Response, our reply accompanies the restatement. The question regarding our objectivity is summarily addressed in the Gartner cover letter to our responses.

We would like to point, with regards to a specific reference to our objectivity, that we don't understand the logic behind the assertion that our ranking UIA "fourth" is evidence of a "lack of objectivity." We believe the assertion is unfounded and poorly supported within your comments. We scored UIA on the basis of our evaluation of their responses for the comprehensive questions "mapped" to specific criteria. The UIA proposal has strengths. Clearly, the successful operation of the .org, .net, and .com constellation is one of them. The UIA proposal also has weaknesses. The lack of specifics regarding the transition that may occur during a proposed re-compete three years hence is one of them. We believe UIA was scored fairly and objectively – they scored highly considering the fact that they did not present a transition plan.

Response to concerns raised within "The .Org Foundation's Detailed Response to the ICANN Board and Staff regarding the evaluation reports."

2. Regarding the statement "Did not propose real-time updating of Zone files and Whois database."

We reviewed the references provided and agree real-time updating of the Zone files and Whois database has been proposed. The scoring for this section will be adjusted.

However, given the minimal information included within the proposal, and the lack of detail regarding the updating process, we do not agree with the statement that this omission is a "glaring inaccuracy."

3. Regarding the "lack of an OT&E environment."

Our transition evaluation team did note the use of an OT&E, but our technical team did not find any detail regarding the OT&E equipment within the response to question C17. The technical score will be adjusted to reflect the presence of an OT&E.

We note, the references to an OT&E environment were not found, as should be expected, within the 22 pages provided as a response to the C17 technical questions.

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Our inability to find OT&E detail submitted within your technical response section does not, as you suggest, represent a "glaring inaccuracy" on the part of Gartner.

4. *Criterion 7—type/quality/cost of services.*

Having the lowest price and a sound set of services does not automatically lead to a high score. Criterion 7 is mapped to questions that include cost, quality, as well as technical plans, equivalent access for registrars, etc. Since no specific omission or error has been provided our scoring remains unchanged, and is consistent with the responses provided in the proposals.

5. *Criterion 8—ability and commitment to support, function in and adapt protocol changes.*

Once again, the questions that map to this criterion go beyond the individual experiences with a protocol. Additional factors such as equivalent registrar access, technical assistance, personnel accessibility, protocol support during and following the transition as well as the consideration given to managing the migration in a way that minimizes burdens on registrars, all can influence the direction of the score. Since no specific omission or error has been provided our scoring remains unchanged, and is consistent with the responses provided in the proposals.

6. *Criterion 9—transition considerations—report erroneously states that registrants and users will be minimally affected.*

Our comments are a direct reflection of the proposal. Gartner is restating the first sentence from .org's response to section C18.4 within the proposal, which reads, "Both .org registrants and Internet users will be minimally affected by the registry transition." We agree that the impact is minimal, and have not marked down the applicant for that issue. The overall lower ranking in this section, despite a good overall plan, can be attributed to having a lack of demonstrated experience, a minimal contingency plan, and a poor set of metrics to assess the progress of the transition.

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Organic

1. Criterion 7—"there is no specific cost model to justify the stated pricing."

The Cost Models referenced within Exhibit 7 were found as indicated. The contents were reviewed and scoring changes made.

2. Criterion 11—"The plan is to replace CentralNic's system with Organic's own developed system at the end of the first year."—This statement is incorrect.

Comment will be changed to reflect the correction, and will read that the contract with CentralNIC is for a duration of no less than one year, after which an unspecified system operation change may be made. The proposal does not describe the extent or timetable for these changes. No scoring impact, as the change will still occur, regardless of who builds or operates the systems.

Register

1. Problems have arisen with some of the existing operators.

During the course of our initial evaluation we did not investigate the historical performance of the existing Registry operators. Our focus was on the material presented within the proposals.

During the course of our final evaluation we did consider the performance history of the operators as presented in response to our supplemental questions. Some score were adjusted appropriately. We rely on ICANN to come to the final conclusion regarding the experience and achievements of applicants by synthesizing our observations with other historical performance data that we may not have had access to.

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Between the demonstrated ability to operate an SRS database, and the demonstrated ability to operate the DNS, Whois service and a thick database, we are of the opinion that you have clearly demonstrated the capability to operate the .org Registry.

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4. *Redundancy at the secondary site.*

After further consideration we believe Registry Advantage is correct in their comment regarding Registry Advantage having provided a level of redundancy between the primary and secondary SRS sites comparable to the other leading applicants. Gartner will revise the scoring to reflect this fact.

Regarding the suggestion Gartner "fails to appreciate the extent of redundancy at the primary site" Our evaluation did note "The data centers included a high availability design using server clustering, storage arrays, and load balancing." We felt our observance of this fact represented our appreciation for the level of proposed redundancy.

5. *"Unknown issues" raised by using Tokyo as the secondary site location."*

Our comment regarding "unknown issues" is just that—an observation there may be unknown issues regarding locating the backup data center in Tokyo that are beyond the scope of our evaluation. Examples of "unknown issues" are as follows:

- The worst case scenario of a primary site failure at a peak operating time of 1200 EST and 0100 Tokyo time are not addressed. The operational issues associated with the transfer of operations are not addressed in the application and therefore "unknown at this time."

- The language challenges associated with the inter-management of the primary and secondary site are "unknown" and not addressed in the application. It may be that both staffs are completely bilingual and are capable of handling any situations that may arise. We just don't know.

Please note that although Gartner has raised the issue of "unknown issues," we did not adversely score the proposal as a result. Furthermore, we readily acknowledge the merit of siting the secondary data center in a geographically diverse location. Please also note that we do not—in any way—suggest that Tokyo is an inappropriate location for the secondary SRS data center. We only suggest ICANN be aware of the possibility of an unknown risk and the potential need to further investigate, quantify, and possibly mitigate the risk should the Register.Org be awarded the .org registry operations.

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6. *Customer service languages.*

In our dealings with ICANN, our review of the RFP, background information and the mission of the .org gTLD; we have consistently observed a strong requirement to support international .org registrars and .org registrants. As such, our evaluation of applicants included investigation of explicit commitments to the support of multiple languages in written and verbal forms and the availability of support over multiple time zones.

Although we noted the applicant's commitment to the support of "multiple languages" and 7/24/365 support, we also noted the lack of material detail regarding multinational support.

7. *Operations testing environment.*

We agree with the applicant's observation. Our transition evaluation team did note the use of an OT&E but our technical team did not find any detail regarding the OT&E equipment within the response to question C17. The technical score will be adjusted to reflect the presence of an OT&E.

8. *VeriSign roles and responsibilities in the transition.*

No response needed.

9. *Relevant operational experience.*

The applicant is correct in their observance of the relatively strong weighting Gartner placed on Registry operations experience in our evaluation of the applications. It is Gartner's opinion that a significant predictor of future performance is past performance. We also believe that the detailed functional requirements for the operation of a Registry are primarily learned through experience.

During our evaluation of an applicant's experience we did not perform a detailed investigation into the past performance of Registries referenced by applicants. We only evaluated the information presented within the application.

Generally speaking, we believe the problems referred to in your comments were the result of "land rushes" on the new gTLD names. We believe .org will not experience traffic bursts attributable to land rushes. However, we do expect the registry to continue to experience traffic bursts attributable to "add storms" for desirable names that become re-available. As a result of our evaluation, we believe the top-rated applicants are all capable of handling the forecasted traffic loads without sustained violation of the Service Level Agreements.

We agree with the observation regarding the need for scalability of systems. During our evaluation we closely assessed the ability of an applicant to scale their systems to meet forecasted predicted and unpredicted demand/ scaling. We are confident that the top-

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rated applicants have the ability to scale their systems successfully to meet the needs of the .org registry.

We agree with the observations regarding the need for the Registry operator to handle add storms. However, we did not, as you suggest, use experience as the criterion for evaluating an applicant's ability to handle an add storm. We chose instead to use infrastructure scalability, provisioned and peak capacities, and estimated transaction per second performance as the basis of evaluating the applicants' capability to handle an add storm or other peak traffic loads. We also, where applicable, evaluated the presence of rate limiting equipment, or other traffic management tools, in the event the systems are unable to handle peak traffic requirements. Although Gartner cannot predict the size and scale of future add storms, we believe the applicants rated by Gartner at above average and higher are best capable of handling expected add storms.

Finally, we believe we did consider Registrar experience in our evaluation of applicants' experience. We consider a Registrar's experience operating a thick database, providing DNS and Whois services, to be a valuable – and directly applicable – experience for consideration in the evaluation of an applicant's capability to operate a Registry.

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Switch

We performed a rerun of the scoring for Switch following a realization that we may have misinterpreted some of Switch's responses and that they may have misinterpreted some of the questions. We believe this misinterpretation exists as a result of our observation of Switch repeatedly providing answers to questions in incorrect locations. Switch's practice of repeatedly referring to proposal appendices made it difficult for our evaluation teams to locate the specific answers to specific questions.

Our review of the scoring revealed that many of the questions were adequately addressed within appendices to the proposal. In fact, nearly all of the proposal was contained within the appendices (this is decidedly not common practice for proposals we typically review). Our revised scoring will be included within the final report.

1. *Proprietary pre-EPP type of protocol.*

Gartner evaluated the applicants, in part, on their experience using the EPP protocol. We recognize the experience Switch has in the use of a pre-EPP protocol and will adjust the score appropriately.

2. *Sized equipment at the lower end.*

Some portions of the technical design did not score high due to insufficient content in the response. Although we respect the experience Switch has in the deployment of a thick Registry, we still have concerns regarding the minimal sizing of the equipment in the proposal. We would highly recommend ICANN observe some performance testing using the .org database should ICANN award the registry to Switch.

3. *Will deploy thin Whois service.*

Applicants were scored, in part, on the basis of their intended rollout date for EPP, thick Whois, etc. All things being equal, those applicants that made EPP available sooner scored higher.

4. *No detail provided on SLAs.*

Question C17.13 "System Reliability" asks "define, quantify and analyze Quality of Service (QoS)." We were of the opinion that the response to this question should have been framed in terms of Performance Specifications as specified in Appendix D of the existing ICANN sponsored registry agreements. During our review of the proposal we did not readily find the SLA commitments provided as a response to for this question (C17.13.) The response provided in the proposal was framed in terms identifying the QoS commitments based on your interpretation of the question.

We recognize that Switch is not currently an ICANN-sponsored Registrar and may have misinterpreted the questions. We have submitted a subsequent question allowing all

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applicants the opportunity to clearly identify their SLA commitments within a single table. The responses to these questions will be factored into the revised scoring.

5. *Real time registration service.*

Those who proposed real-time services were rated higher on this criterion.

6. *Final price to be determined based on uncertainties in the fees collected by ICANN.*

The comment will be changed to reflect the final price to be determined by the community, and score is changed to reflect the improvement.

7. *No details on registration services.*

Switch's response to this question is a link to an ICANN functional specification document describing registrar services. Additional details were not provided with respect to the services, nor were any enhancements discussed. We had, and have, no justification for assigning a greater than minimum response score.

8. *Little detail provided for the methodology proposed to promote equivalent business practice.*

There is very little detail provided. We rated the applicants based on the completeness of their response for this service. Those who provided greater detail and content were rated higher on this item. We had no justification for assigning a greater than minimum response score.

9. *No timetable.*

A set of dates for EPP server readiness are provided, but there is insufficient supporting material. The applicant makes no commitment to have EPP deployed within 135 days from the formalization of the protocol. The response is inadequate.

10. *Unclear rollout.*

Switch responses were inadequate in the primary section. However, additional rollout information was found an unrelated section of the document. Scoring changes are made.

11. *Does not communicate understanding of major TLD transition.*

Applicant concurs with the lack of detail. No additional comment needed.

12. *No understanding of contingency.*

In this section, Gartner is looking for the applicant to identify areas of uncertainty or risk in the transition plan. We evaluated how applicants addressed each of these risks. We look for backup or recovery plans, alternatives and preparedness among other things. This information is absent from the applicant's proposal.

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Applicant also introduces new information in their response, with the mention of the Nov. 1999 transition. New information is not admissible for consideration at this time. Also note that a successful transition in the past is not an indication of contingency plan.

13. Overall Criterion 11 issues.

Criterion 11 is about the entire proposal. Switch's proposal lacks detail in many key areas, and was marked down as a result. When Switch responds to a question in the RFP with an html link to ICANN material they miss out on the opportunity to convey any additional value.

We do not doubt Switch's level of experience in running a TLD; however, the experience and capability need to show through the proposal by way of thorough descriptions and comprehensive answers to questions.

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UIA

1. *See cover letter response above.*

2. *Current registry operator VeriSign scores third in Criterion 1.*

Criterion 1 maps to many questions. Some are directly related to stability, and others are not. Applicant suggests that VeriSign scored a third-place position in "stability." That is an incorrect assumption. The applicant scored a third-place position in Criterion 1, which includes RFP sections that can be summed up as Technical Stability, but in reality includes items such as providing technically sound, high-quality services that meet the needs of .org registrants in a manner that provides affordable services with a high degree of service responsiveness and reliability. UIA did not provide above average responses in format or content to justify a higher score. When all the components are taken into account, the criterion goes well beyond stability. UIA did well enough to place third.

3. *Current registry operator VeriSign scores seventh in Criterion 9.*

Although it would be safe to assume the transition to the incumbent should be relatively risk-free, we did have some concerns regarding the transition.

We have questions regarding the lack of tasks associated with transferring the management responsibility of the registry from VeriSign to UIA. The applicant provided no overview of the issues regarding operational changes that may be required to accommodate UIAs role as the registry's prime contractor. For example, we don't know if the databases will be partitioned, and if so, how.

Furthermore, although UIA committed to operations re-compete in three years; no mention was made regarding the transition issues and tasks that would be faced at that time. We consider the proposed re-compete to have all of the transition issues that are currently faced by other applicants. And yet, no information was provided for us to evaluate the likelihood of success.

We agree that the initial transition to VeriSign should present the least risk of all proposed transitions. However, the lack of detail regarding the potential transition in three years time completely offset any scoring advantage UIA had.

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Unity

1. SLAs.

Multiple applicants have raised questions regarding the SLA commitments. Gartner has requested of each applicant to provide a summary sheet of the SLA commitments for reevaluation.

2. Database.

Gartner, in its advisory letter, identified unknowns within the proposed ISOC database architecture and advised ICANN regarding the need for additional due diligence with the leading applicants.

3. Manual fail-over.

We are not necessarily of the opinion the fail-over to the secondary data center, secondary database, etc., should be automatic. We believe certain aspects of operating a Registry should not be relegated to functioning in "autopilot."

4. Existing systems.

We did not investigate the capability of existing systems to perform in accordance with SLAs. We believe a vendor's repeated violation of enforceable SLAs will result in the termination, with cause, of the registry agreement.

5. Size vs. scalability and competition.

Refer to database response.

6. Delayed zone file updates.

Unity did score the highest (along with others) within this sub-criterion.

a) Incomplete billing system.

The billing system is only a small component of this entire section, and variations in all applicants were taken into account when developing a final score.

b) No technical plan for equal access.

Criterion 1 maps to many questions. Some are directly related to stability, and others are not. Applicant suggests that VeriSign scored a third-place position in "stability." That is an incorrect assumption. The applicant scored a third-place position in Criterion 1, which includes RFP sections that can be summed up as Technical Stability, but in reality includes items such as providing technically sound, high-quality services that meet the needs of .org registrants in a manner that provides affordable services with a high degree of service responsiveness and reliability. UIA did not provide above average responses in format or content to justify a higher score. When all the

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components are taken into account, the criterion goes well beyond stability. UIA did well enough to place third.

c) Price.

The scores for criterion 7 reflect more than just the total proposed price. Having a low price does not automatically result in a high score.

Section 7—Proposal details guarantee performance levels.

Gartner's review of the ISOC proposal indicates no basis for this claim. Also, the performance levels alone do not form the basis for this criterion evaluation. ISOC makes the guarantees for performance levels that are stated. It is our assumption that presentation of performance levels in a proposal implies a willingness to contractually commit to the statements. This can be interpreted as a guarantee.

Section 8—No justification provided for the low rating.

Unity scored a 3.46, which is not a low rating, it is the median rating for the group. Some applicants were able to score better based on the strength of their responses to the set of questions that constitute the criterion.

Section 9—Transition considerations.

a) Credibility.

No response needed.

b) Complex nature of AusRegistry and .au registries.

No response needed.

c) Incomplete plan.

A Gantt chart can supplement transition plans, but the meaningful content of a Gantt chart can also be conveyed in text format. Gartner reviewers were satisfied with the materials presented and have scored each applicant accordingly.

d) Based on prior experience.

A strong transition plan was provided in the ISOC proposal and was graded accordingly.

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