

**ICANN NEW gTLD PROGRAM COMMITTEE SUBMISSION NO. 2013.08.13.2a**

**TO:** ICANN New gTLD Program Committee  
**TITLE:** Durban Communiqué – GAC Advice on New gTLD Program  
**PROPOSED ACTION:** For NGPC Discussion

**EXECUTIVE SUMMARY:**

During the ICANN meeting in Durban, South Africa, the GAC issued its Durban Communiqué on 17 July 2013. The NGPC is being asked to begin to consider the GAC’s advice in the Durban Communiqué related to the New gTLD Program. Consistent with the framework used to address the GAC’s advice in the Beijing Communiqué, the NGPC is being asked to use the “scorecard” approach to organize individual items advice from the Durban Communiqué into discrete groupings to allow the NGPC to prioritize its work.

**STAFF RECOMMENDATION:**

Staff recommends that the NGPC begin its discussions to address the GAC’s advice in the Durban Communiqué, and to consider taking action at future meetings on the scorecard. This will allow for additional discussion and consideration of applicant comments on applicable items of advice.

**Signature Block:**

Submitted by: Jamie Hedlund

Position: Advisor to the President

Date Noted: 7 August 2013

Email: [jamie.hedlund@icann.org](mailto:jamie.hedlund@icann.org)

**Privileged and Confidential**

**Draft Scorecard – Durban  
Communiqué**

**Intentionally Omitted**

## ICANN NGPC PAPER NO. 2013.08.13.2b

**TITLE:** Dotless Domain Name Impact Study

**PROPOSED ACTION:** For NGPC Consideration

### **EXECUTIVE SUMMARY:**

Dotless domain names consist of a single label (e.g., *http://example*, or *mail@example*) that would require the inclusion of, for example, an A, AAAA, or MX, record in the apex of a TLD zone in the DNS (i.e., the record relates to the TLD-string itself).

In February 2012 the Security and Stability Advisory Committee (SSAC) expressed concern about the use of dotless domain names for gTLDs in SAC 053 and recommended against their use for gTLDs. Since February 2012, the community has had the opportunity to express public comment on SAC 053 and ICANN commissioned a follow up study of the risks associated with dotless domain names, which was prepared by Carve Systems, LLC. Consistent with the SSAC report, the Carve Systems report identifies security and stability issues that should be mitigated if gTLDs are permitted to implement dotless domain names.

Currently for new gTLDs, the Applicant Guidebook (AGB) contains a statement that advises that any new gTLD applications proposing to operate as dotless domain names could be referred to a registry services extended evaluation, which utilizes the Registry Services Technical Evaluation Panel (RSTEP). This is similar to the process any current contracted gTLD wishing to change their service to a dotless domain name would undergo.

The NGPC is being asked to review the latest studies, and to take formal action to document ICANN's position on new gTLDs being operated as dotless domain names.

### **STAFF RECOMMENDATION:**

Staff recommends that the NGPC take action and direct the staff to reiterate to the community that dotless domain names pose significant technical risks to the security and stability of the DNS, and since these risks cannot be mitigated, staff further

recommends that the NPGC direct the staff to prohibit the use of dotless domains in the DNS.

**PROPOSED RESOLUTION:**

Whereas, dotless domains consist of a single label and require the inclusion of, for example, an A, AAAA, or MX, record in the apex of a TLD zone in the DNS.

Whereas, Section 2.2.3.3 of the Applicant Guidebook (AGB) prohibits the use of dotless domain names without evaluation of the registry services and ICANN's prior approval.

Whereas, on 23 February 2012, the ICANN Security and Stability Advisory Committee (SSAC) published [SAC 053: SSAC Report on Dotless Domains](#), and recommended that the use of DNS resource records such as A, AAAA, and MX in the apex of a Top-Level Domain (TLD) should be contractually prohibited where appropriate, and strongly discouraged in all cases.

Whereas, on 23 June 2012, the ICANN Board adopted resolution [2012.06.23.09](#) tasking ICANN to consult with the relevant communities regarding implementation of the recommendations in SAC053.

Whereas, on 24 August 2012, ICANN staff published the [SAC053 Report for public comment](#) requesting input to consider in relation to implementing the recommendations of the SSAC report.

Whereas, in May 2013 ICANN [commissioned](#) a study on the stability and security implications of dotless domain name functionality to help ICANN prepare an implementation plan for the SAC053 recommendations, and on 29 July 2013 Carve Systems delivered a report to ICANN identifying the security and stability issues that should be mitigated before gTLDs implement dotless domain names (the "Carve Report").

Whereas, on 10 July 2013 the Internet Architecture Board (IAB) released a [statement on dotless domain names](#), recommending against the use of dotless domain names for TLDs.

Whereas, the NGPC has considered the risks associated with dotless domains as presented in SAC053, the IAB statement and the Carve Report, and the impracticality of mitigating these identified risks. The NGPC has also considered the comments received from the community on this issue.

Whereas, the NGPC is undertaking this action pursuant to the authority granted to it by the Board on 10 April 2012, to exercise the ICANN Board's authority for any and all issues that may arise relating to the New gTLD Program.

Resolved (2013.xx.xx), the NGPC acknowledges the security and stability risks associated with dotless domains as presented in SAC053, the IAB statement and the Carve Report and affirms its commitment to its security and stability mandates as the New gTLD Program is implemented.

Resolved (2013.xx.xx), in light of the current security and stability risks identified in SAC053, the IAB statement and the Carve Report, and the impracticality of mitigating these risks, the NGPC affirms that the use of dotless domains is prohibited.

Resolved (2013.xx.xx), the President, Generic Domains Division is authorized to take all necessary steps to implement these resolutions.

## **PROPOSED RATIONALE:**

### **Why the NGPC is addressing the issue?**

The SSAC issued SAC 053 to the ICANN board which requests action be taken to prevent gTLDs from being approved to operate as dotless domain names. The Board requested staff to prepare an implementation plan for SAC 053. The topic has gained attention of the community and was discussed in several forums at the ICANN Meeting 47 in Durban, South Africa.

### **What is the proposal being considered?**

The NGPC is being asked to consider taking action to provide clarity to the community that dotless domain names continue to pose technical risks to the security and stability of the DNS and that mitigation of these risks will be very difficult to achieve.

**Which stakeholders or others were consulted?**

The SSAC published SAC 053 in February 2012 and have been consulted over the course of the last year on this issue. ICANN consulted with the community on the issue of dotless domains, and solicited public comment on SAC 053 in August - November 2012. Additionally, ICANN commissioned Carve Systems, LLC, a security consulting firm, to perform a detailed study of the potential risks gTLDs operating as dotless domain names may pose. In July 2013, the Internet Architecture Board (IAB) issued a statement identifying concerns similar to the SSAC and Carve reports, and advising against the use of dotless domain names for gTLDs. The NGPC has considered the information provided from these stakeholders and outside experts on the issue.

**What concerns or issues were raised by the community?**

The SSAC expressed concern about the use of dotless domain names for gTLDs in SAC 053 and recommended against their use. During the public comment on SAC053, some members of the community supported the position of the SSAC and noted that due to the security and stability concerns posed by dotless domains, they should not be allowed. Others in the community have argued that dotless domains should be allowed for technical innovation and that the risk assessment is overly conservative as there are ways to mitigate the risks to not unduly upset the security and stability of the Internet. A report of the public comments can be reviewed at:

<http://www.icann.org/en/news/public-comment/report-comments-sac053-dotless-domains-27nov12-en.pdf>

**What significant materials did the NGPC review?**

The NGPC considered the following significant materials:

- [SAC 053: SSAC Report on Dotless Domains](#)
- [The report of Public Comments on SAC 053](#)
- Carve Systems Report “[Dotless Domain Name Security and Stability Study](#)”
- The IAB [statement on dotless domain names](#)

**What factors did the NGPC find to be significant?**

The NGPC considered ICANN's core role as coordinator of the Internet naming system for the security, stability and resiliency of the DNS and the Internet's unique identifier system. The NGPC also found the reports presented by the SSAC and Carve Systems to be significant factors in its decision. On balance, the NGPC believes technical concerns continue to exist with the implementation of dotless domain names and the use of DNS Resource Records in the apex of a TLD zone beyond SOA, NS, and related DNSSEC records.

**Are there fiscal impacts or ramifications on ICANN (strategic plan, operating plan, budget); the community; and/or the public?**

There is no anticipated fiscal impact of adopting this action.

**Are there any security, stability or resiliency issues relating to the DNS?**

The technical experts of the SSAC, Carve Systems and the IAB believe gTLDs operated as dotless domain names will negatively impact the security, stability and resiliency of the DNS. Approval of the proposed resolution to prohibit use of dotless domains in the DNS will not negatively impact security, stability or resiliency issues relating to the DNS.

**Signature Block:**

Submitted by: Russ Weinstein

Position: Panel Coordination  
Manager, New gTLD program

Date Noted: 9 August 2013

Email: russ.weinstein@icann.org