13 June 2013

Dear Mr. Keith Drazek:

Thank you for your letter dated 3 June 2013, sent on behalf of the members of the Registries Stakeholder Group (RySG), in which concerns were raised regarding Pre-Delegation Testing (PDT). We appreciate the time that you spent compiling recommendations for each of the issues raised. We would like to address the issues described in your letter. You will find we have already taken action or implemented solutions to resolve many of these items and believe the remaining items requiring discussion is a short list.

1. PDT Pilot—Testing Interaction

ICANN acknowledges that the interaction between the participants and the PDT provider during the pilot was an area that needed improvement. As a result of the Pilot, the service hours were extended to fourteen hours per day (05.00 – 19.00 UTC) Monday through Friday. In both Beta Testing and production, the applicants and the PDT provider have the ability to interact within the PDT system via the messaging tool. These discussions do not get “cleared” by ICANN. We have instituted and SLA with the PDT provider to respond to applicant questions within one business day.

As for the two recommendations, these are both interesting suggestions that can be considered by ICANN and the PDT provider. It is important to remember the Beta Testing Program was not pre-planned and was established to maintain program momentum as a result of the registry agreement public comment period. As such, the PDT system and processes intended for production have been applied to the Beta Testing Program with a few process modifications. Regarding the first recommendation at this time, the PDT provider is neither staffed nor contracted to support the point-of-contact model suggested; however, it is something we could consider for the remainder of the Beta Testing period. Perhaps a more detailed discussion of what type of support the applicants are seeking could facilitate developing a workable solution for all parties.

With respect to the second recommendation, as mentioned previously, the idea of Beta Testing was to simulate production utilizing a similar cycle and cadence. The participant has a time window to complete data entry, and the provider has allotted time to complete the testing. The provider then returns the test results report to ICANN, who in turn provides it to the applicants. Keeping the system available for applicants for the entire duration of the Beta Testing period was not envisioned; however, a compromise solution can probably be devised in the requested teleconference.

Status: Requires discussion over teleconference to better understand the needs of the RySG and find potential solutions.
2. **PDT Pilot—Feedback on Results**

ICANN acknowledges the issue, which we have also identified and resolved with the PDT provider. The test reports have been improved to provide binary results for each test case with clear feedback for any non-passing items. Additionally, the test cases will be updated to identify the pass/fail criteria.

Status: Resolved

3. **PDT Technical Implementation and Timelines**

While we had hoped the specifications would not require any changes, we recognized the need for improvements and have tried to utilize the Beta Testing period to implement these changes as the needs were discovered. ICANN understands the challenges this puts on applicants to keep up with latest versions, but we believe some of the items warranted immediate implementation. In the meantime, in order to account for the changes in requirements, we allow an applicant to opt-out from a particular test case during the Beta testing. ICANN agrees with the RySG recommendation and will batch remaining items (bug fixes and improvements) into a single release of the PDT test specifications at the end of the Beta Testing period.

Status: Resolved – Recommendation being implemented

4. **Query-by-Proxy**

ICANN has changed its approach to the DNS testing component of PDT as a result of community feedback. The anycast instance testing approach is no longer a requirement in the input templates, neither directly nor by proxy. The input templates only require the public-facing anycast service addresses/names, and the tests will utilize a higher number of globally distributed test nodes.


Status: Resolved

5. **Disclosure of Sensitive Date and Security Controls**

As explained above, anycast instance testing is no longer being performed and, therefore, those back-end addresses are not requested in the input templates. Similarly, interconnection and peering information are not requirements in the updated input templates.

Network and server capacity are, however, required as described in the gTLD Applicant Guidebook for both as part of the application and PDT. The PDT system is divided in three decoupled sub-systems in
order to minimize exposure to outside threats. The front-end system as seen by the applicant/registry is only concerned with allowing data input. After the data submission period closes, the data is migrated to secure internal systems – dedicated for testing – and is no longer available in the front-end system. A third-party security audit has been performed on these systems.

Status: Resolved

6. IDN Testing

ICANN would appreciate more information on what is meant by the “IDN testing table”. Perhaps this could be a topic for discussion in the proposed conference call.

Status: Requires discussion at proposed teleconference.

7. Self-Certification Against Production Systems

ICANN confirms that the requirement to use production systems allows the use of production hardware and software that are not currently in the live query path. The requirement also allows the ability to extrapolate results of a subset of the total serving infrastructure across the entire system (e.g., one representative server).

Additionally, if a set of TLDs is sharing the same infrastructure, the self-test does not need to be repeated multiple times; the results from one test can be submitted with each of the related gTLD PDT documentation.

Status: Resolved

8. Standardized Testing Schema

ICANN agrees that the Period declaration for Domain Create or Transfer is optional as specified in the EPP standard. ICANN has communicated the bug to the PDT provider and instructed it to make the appropriate changes in the test specification. This will be included in the update to the test specifications and input templates mentioned earlier in this memo.

Status: Resolved

Thank you again for bringing forth these issues and recommendations. As you can see, we recognize the issues and have or are in the process of implementing many of them. We believe the majority of the items can now be considered resolved. For those few issues that need further discussion, we would like to take your offer to have a conference call to reach closure. We propose to host a 60-minute conference on Friday 28 June at 17.00 UTC.
Thank you for your participation in ICANN's multi-stakeholder model. We strongly value your feedback, and we look forward to discuss and reach closure on the few remaining issues.

Best regards,

Akram J. Atallah
Chief Operating Officer, ICANN