7 March 2014

Dr. Burt Kaliski Jr. - Senior Vice President and CTO
Mr. Patrick S. Kane – Senior Vice President, Naming Services
VeriSign Inc.
12051 Bluemont Way
Reston, VA 20190

Dear Dr. Burt Kaliski Jr. and Mr. Patrick S. Kane:

Thank you for your letter dated 17 January 2014. We appreciate that you took the time to write to us, and we have posted your letter to the New gTLD correspondence page (http://www.icann.org/en/news/correspondence/kaliski-kane-to-atallah-crain-17jan14-en.pdf).

As you are aware, the New gTLD Program and the Applicant Guidebook were the result of years of community discussion and the formal Policy Development Process. As the Program was developed, ICANN considered the experiences from the two earlier rounds of new gTLDs.

We would like to address some of your concerns below, but first we would like to emphasize that to date, of the more than 160 new gTLDs that have been delegated, ICANN has not received any reports of name collision from network operators. As a reminder, third parties may report demonstrably severe harm as a consequence of name collision via the ICANN website at (http://www.icann.org/en/help/name-collision/report-problems).

The “Day in the Life of the Internet” (DITL) data on which the New gTLD Collision Occurrence Management Plan is based is the best root-server data available today. In developing the New gTLD Collision Occurrence Management Plan, we used the most comprehensive data set available to design a solution that would minimize risk. ICANN sought public comment on the Proposal to Mitigate Name Collision Risks on 5 August 2013 (http://www.icann.org/en/news/public-comment/name-collision-05aug13-en.htm), and considered the comments received while developing the New gTLD Collision Occurrence Management Plan (http://www.icann.org/en/groups/board/documents/resolutions-new-gtld-annex-1-07oct13-en.pdf).

The conservative nature of the plan allows new gTLD applicants and registry operators to move forward, while managing risk for network operators and protecting the security and stability of the Internet. We note your suggestion that additional technical analysis should be...
performed, but we would like to point out that any data collection performed at this point in time provides opportunities to manipulate the data, with potentially adverse results.

On 26 February 2014, ICANN released a draft report on name collision for public comment (http://www.icann.org/en/news/announcements/announcement-26feb14-en.htm). The paper "Mitigating the Risk of DNS Namespace Collisions" (also referred to as the "Name Collision Occurrence Management Framework"), which considered community input as it was written, calls for a controlled interruption measure that does not rely on the DITL data. We invite you to submit your comments to the forum; the public comment period closes on 31 March 2014. (The reply period is open from 1 April 2014 to 21 April 2014.)

Thank you for your valuable feedback. We look forward to your continued participation as we implement the New gTLD Collision Occurrence Management Plan.

Sincerely,

John L. Crain
Chief Security, Stability, and Resiliency Officer
ICANN