



June 13, 2013

Dr. Stephen Crocker, Chairman of the Board of ICANN
Mr. Fadi Chehadé, President & CEO
Mr. Cherine Chalaby, Chairman of the New gTLD Committee
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

RE: Google's Proposed Dotless Domain Amendment to its .search gTLD Application

Gentlemen:

Yahoo! Inc. ("Yahoo!") is writing to join Microsoft Corporation in expressing concern over Google's amendment (through its Charleston Road Registry subsidiary) to run its gTLD application for .search as a "dotless" domain as set forth in the letter from Sarah Falvey to Christine Willett dated April 6, 2013 and posted at <http://www.icann.org/en/news/correspondence/falvey-to-willett-06apr13-en>. As stated by Microsoft Corporation in its letter to ICANN dated May 17, 2013, we believe Google's plan runs counter to the recommendations of the SSAC found in the Report on dotless Domains dated February 23, 2013 ("SAC053") posted at <http://www.icann.org/en/groups/ssac/documents/sac-053-en>.

In its April 6, 2013 letter, Google requested permission to expand its application for .search to run this TLD as a dotless domain (<http://search/>). Dotless domains are currently used by private parties as intranet addresses for internal networks. As Microsoft points out in its letter, Google's proposed amendment would interfere with that private space, creating security vulnerabilities and impacting enterprise network and systems infrastructure around the globe.

In SAC053, the SSAC advised against dotless domains. The SSAC Report concluded that dotless domains would create significant security risks and recommended against their use. Specifically, the SSAC stated that dotless domains "would not always work as expected" and "would lead to unpredictable and unexpected dotless domain behavior." Google was a contributor to this Report and agreed with SSAC recommendation.

Google's proposed amendment to its .search application is a stunning reversal of its former position and blatantly disregards the security, stability, and reliability concerns raised by the SSAC and its contributors, and explicitly proposes using technical specifications (such as AAAA records)





that the SSAC advised against. Not surprisingly, Google made no mention of its prior positions or the SSAC Report in its April 6, 2013 letter. We believe this silence is telling.

Yahoo! is happy to engage in further dialogue with ICANN over its concerns about Google's proposed amendment to its .search application. If ICANN would like to engage in further discussions, please contact Laura Covington (lhc@yahoo-inc.com) or J. Scott Evans (evansi@yahoo-inc.com).

Thank you in advance for your consideration.

Sincerely,

Yahoo! Inc.

A handwritten signature in blue ink that reads "J. Scott Evans" followed by a small mark that looks like "K.M.".

J. Scott Evans
Head of Global Brand, Domains
& Copyright

Cc: Suzanne Radell

