Charleston Road Registry

VIA EMAIL   July 11, 2013

Akram Atallah
President, Generic Domains Division
12025 East Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536

Re: CRR's Proposed Dotless Domain Amendment to its .SEARCH Application

Dear Mr. Atallah:

I am writing to you today to respond to several posted comments regarding Charleston Road Registry's (CRR) amended application for .SEARCH; specifically the concerns raised over CRR's plans to operate .SEARCH as a dotless domain should it end up managing the string.[1]

CRR's principal goal for its new gTLD program is to increase innovation in the domain name sector by developing unique and interesting ways to expand the name space and extend the utility of the domain name system. In deciding to amend our application for .SEARCH, we spent considerable time thinking about what could be both innovative as well as providing unique choices for end users not yet available on the Internet to date.

We firmly believe that the type of redirect service we are proposing in our .SEARCH application is exactly the type of innovative and user-friendly service which the gTLD program was intended to encourage. The TLD will make it easier for users to find and access the search services of their choice, enable developers to build functionality that allows searching according to a user's stored preference, and, by storing the preference remotely, reduces the chance that the user's search engine preference will be overridden without their consent.

While we acknowledge that dotless domains may pose some unique risks, we think that our application is a well-considered and safe implementation that should to be carefully considered by ICANN pursuant to Section 2.2.3.3 of the Applicant Guidebook. In addition, CRR will not provide preferential treatment to its parent company, Google Inc., in either the allocation of names or in considering eligibility criteria for registration within the TLD. In fact, the technical eligibility criteria for the .SEARCH string was developed precisely to be as generic and inclusive as possible, and the required query interface has already been

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[1] CRR is currently in contention for the .SEARCH string with three other applicants: Amazon, Donuts, and Famous Four Media, and therefore, there is no guarantee that CRR will in fact be the operator of the .SEARCH TLD since the string is currently in contention.

implemented by a variety of search engines including Bing, Yahoo!, and Ask in addition to vertical search providers such as TripAdvisor.[2]

We amended our application after careful thought and consideration as to ways to mitigate some of the well-known concerns regarding dotless domains, which were highlighted in the SSAC's SAC053 recommendations.[3] We fully expect this proposal to be carefully reviewed by ICANN. We understand that dotless domains must be explicitly approved by ICANN, and do not have any intention of launching any dotless services until both CRR and ICANN are fully satisfied that any security issues have been appropriately addressed. Although the Guidebook provides a list of permissible zone contents, it also provides for applicants specifying details of services that propose other types of records at the apex of the zone. In particular, to operate the Search Redirect Service, we propose to insert both A and AAAA records into the apex of the .SEARCH zone file that refer to the load-balanced IP addresses for the web service described in Section 23.10 of CRR's revised application.[4] The A and AAAA records may also be signed with relevant DNSSEC records, but signing records at the apex of the zone are already explicitly allowed in the Applicant Guidebook.

Of particular note, we are *not* proposing to include any wildcard records within the .SEARCH zone. We will also not operate any mail services on the IP addresses provided at the apex of the root, nor will we include MX records at the apex of the zone, all of which are highlighted as key concerns associated dotless domains. Although we understand that SSAC 053 recommends against the use of "dotless" domains, we believe the concerns related to the insertion of A and AAAA records at the apex of the TLD zone largely relate to inconsistent resolution in environments where search paths or other features of the resolution path may interpret the domain name as a subdomain within another TLD rather than as a dotless TLD.

We believe this concern is largely mitigated in the case of .SEARCH for three reasons. First, the impact of the failure is largely confined to users attempting to use the Search Redirect Service, and *not* broader functions of the Internet. Only those search providers electing to make use of the .SEARCH TLD would be at any risk from resolution failures, and these service providers should be both sophisticated and capable of evaluating the potential risk that some users may not be able to reach the redirect service at all times. Second, it may be reasonable for users attempting to navigate to "http://search/" to be redirected to a local search capability while on, for example, a corporate intranet, while reaching the Search Redirect Service provided by CRR while on a public network. Third, traffic destined for "search" domain names will originate from browsers rather than legacy applications likely to fail as a result of being misdirected. As a result, we do not believe that our proposed service will have any adverse impact on the overall security or stability of the Internet.

As an aside, we note that some recent correspondence suggests that our proposed amendment should be disallowed because it fundamentally modifies the purpose of the TLD. While we agree that the proposed changes are significant in that they allow for registration by any provider of search services, at least one

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[2]See CRR's letter to Christine Willet, May 6, 2013, page 26;
http://www.icann.org/en/news/correspondence/falvey-to-willett-06apr13-en.pdf
[3]See http://www.icann.org/en/groups/ssac/documents/sac-053-en.pdf
[4]See CRR's letter to Christine Willet, May 6, 2013, page 33;
http://www.icann.org/en/news/correspondence/falvey-to-willett-06apr13-en.pdf

commenter had previously suggested that "ICANN must require applicants for closed generic TLDs to either open the TLD or withdraw for a full refund"[5]; however, the change request process makes no limitation on substantive versus minor revisions to applications. None of the proposed modifications to the .SEARCH application are to scored questions in the evaluation process and, other than the consideration of whether the dotless redirect service should be allowed, should not require review or approval as part of the evaluation process.[6] Further this round of TLD expansion, as with all previous rounds, was always designed to ensure flexibility within the system was maintained to allow TLD business models to evolve with the needs of end users and the Internet alike. This means that applicants both now and in the future are allowed to change their applications due to changes in the TLD environment. Once a TLD is delegated, operators are able to go back to ICANN and ask for their registry agreement to be amended and changed. In other words, these applications are not static and were never intended to be as even post-delegation TLD operators are able to introduce new services and changes. In that vein, CRR no longer intends to apply for an exception to the Registry Operator Code of Conduct, as this has been made clear in our amendment.

We believe that the amendment to the .SEARCH TLD offers a powerful and innovative experience for Internet users and domain registrants, in this case unlike those currently offered by any TLD operator or proposed by other applicants. We are excited to continue to participate in the new gTLD program and work with those throughout the community to continue to improve our gTLD offerings.
Please do not hesitate to contact me should you have any questions.

Sincerely,

Sarah Falvey
Policy Manager and Primary Contact for CRR

Cc:
Fadi Chehade, CEO
Dr. Stephen D. Crocker, Chairman of the Board of Directors
Cyrus Namazi, Vice President, DNS Industry Engagement
Christine Willett, General Manager
Heather Dryden, Chair of the GAC
Andrew Maurer, Australian GAC Representative
Peter Nettlefold, Australian GAC Representative
Suzanne Radell, US GAC Representative

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[5] See Microsoft's public comment on "Closed Generic" gTLDs, page 3;
http://forum.icann.org/lists/comments-closed-generic-05feb13/pdfFkrCsLiVfP.pdf
[6] Initial Evaluation results have not yet been posted for our .SEARCH application, so to the extent further evaluation is required, it can be accomplished as part of the Initial Evaluation of the amended application.