



September 26, 2013

Dr. Stephen D. Crocker, Chair of the Board of Directors
Members of the Board of Directors
The Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536

Dear Dr. Crocker and Members of the Board:

On behalf of the Association of National Advertisers (ANA), I am writing once again to express our very serious concerns regarding the dramatic expansion of gTLDs, and in particular the issue of name collisions. Unfortunately, as ANA has been warning for some time, ICANN is rushing to deploy new gTLDs without taking the necessary steps to ensure the stability and security of the Internet. The potential harms to consumers, businesses and Internet users are very serious, increasing the dangers of fraud, deception, phishing, and cybersquatting.

As you and other members of the Board undoubtedly are aware, various governmental entities have stated real concerns about the DNS expansion. Officials at the Federal Trade Commission (FTC) have said that, “the potential for consumer fraud is great, and that the planned deployment was a “potential disaster.” FTC Commissioner Julie Brill [stated](#) at ANA’s Advertising Law & Public Policy Conference, “I remain concerned, as I have been since ICANN first announced its plans, that the expansion could create opportunities for scammers to defraud consumers online, shrink law enforcement’s ability to catch scam artists, and divert the resources of legitimate businesses into litigating and protecting their own good names.” Senator Jay Rockefeller, Chair of the U.S. Senate Committee that oversees Internet issues, wrote to ICANN [urging](#) that a limited round of domain name deployment be done at first, so as to permit a one-year review period as to its effectiveness. In July, the U.S. Senate Appropriations Subcommittee with jurisdiction over Internet issues [called](#) on the Department of Commerce to assess whether ICANN will have in place the necessary security elements to protect stakeholders during the DNS deployment.

ICANN itself, in a recent report by its own independent consultant (The Interisle Consulting Group), acknowledges the potential for harm, in particular from name collisions. The [report](#) found that almost all applied-for TLDs have some risk of clashes, and that the harm might become apparent only *after* a new name had been delegated. ANA and others believe that the report is inadequate, in part because it studied only *numbers* -- not *kinds* -- of clashes, such as critical network outages for companies or critical system failures like gas pipeline or electric grid harms).

Two groups within ICANN itself have recently expressed similar concerns. ICANN’s GNSO Business Constituency [stated](#), “[T]he main concern of the BC is ensuring that any potential for

domain name collision in the private network environment -- including the continuity and availability of in-house corporate IT systems – be fully studied, understood and remediated before new gTLDs are introduced into the root.... We urge ICANN to complete additional study on the name collision issues to more fully understand ‘acceptable risk...’ ICANN’s Intellectual Property Constituency [said](#), “[G]iven the serious possibility of security risks and consumer confusion, interested and concerned parties require additional time to analyze the Interisle Consulting Group’s report, ICANN’s proposals, and to conduct and analyze data collected through their own efforts.”

ANA urged ICANN to extend the time period for analysis and comment on the mitigation plan, but so far there has been no indication that any extension is planned. As they are learning more about ICANN’s plans and its insufficient mitigation proposal, numerous other groups echo and amplify their own concerns about a premature rollout of gTLDs by ICANN. Here is what just some leading companies and industries said in comments filed regarding ICANN’s proposal to mitigate name collisions (emphasis added):

- [A coalition of electric cooperatives](#) in New Mexico: “[we are] concerned about the *potential for the gTLD expansion to disrupt and compromise the security of not only their computer networks and communications systems, but also the infrastructure and facilities – such as power lines, switches, substations and transformers – used to transmit and distribute electricity throughout their service regions. ...The Electric Cooperatives are concerned that this expansion of Internet addresses could compromise network security... The Electric Cooperatives believe that it is not solely their four cooperatives that face this threat, but all of the electric utility industry and, indeed, potentially the entire energy sector throughout the United States... the Electric Cooperatives urge ICANN to delay the roll-out and implementation of the new gTLDs, so as to provide sufficient time to study the potential adverse impacts of new gTLDs on the safety and reliability of electric transmission and distribution grids.*”
- [General Electric](#): “The correlation between frequency and risk for any particular gTLD cannot be determined without additional contextual information. ICANN should endeavor to develop a more sophisticated risk model, and commission further studies on this subject...*We strongly urge ICANN to exercise due caution in this area, and to not delegate any gTLD for which there is any question regarding risk until that risk is fully understood.*”
- [Microsoft, Verisign, and Yahoo](#): “These issues must be addressed to preserve the stability, security and resiliency of the DNS. *Allowing known risks to remain unresolved would be irresponsible and inconsistent with ICANN’s core mission.* It is crucial that ICANN’s leadership recognizes and works with the appropriate technical bodies to ensure these issues and risks are defined, evaluated, and addressed comprehensively. This is of particular concern to operators of Internet infrastructure whose networks and customers will be negatively impacted. The cost to business of transferring known risks to unknowing end users is substantial and must be avoided. As described by the SSAC [the Security and Stability Committee of ICANN] and verified by the recent Interisle study, the delegation of new strings that are already widely in use as internal identifiers in enterprise, government, and other private networks into the root of this multi-billion user ecosystem will present substantial security risks. If and when delegations occur, these naming collisions will cause breakage in existing networks, negatively impacting

enterprises, governments, and end users who are unaware of the source of the problem.” Microsoft, Verisign, and Yahoo! then emphasized, “[U]nexpected name collisions caused by new gTLDs being delegated into the root could have devastating consequences...Any such negative impacts may have serious consequences for those who rely on the DNS, and this should raise significant liability concerns.”

- [The United States Telecom Association \(US Telecom\)](#): “...it is feasible that public safety agencies may have internal local name spaces with the potential for collisions with new gTLDs. Similarly, there are several new proposed gTLDs that could potentially collide with internal local name spaces containing highly sensitive personal conditions, including .HIV. Of course, this does not take into account the various gTLDs with seemingly innocuous names (e.g. .FLS) that in a global environment that uses multiple languages, could very well resolve to internal local name spaces containing critical sensitive information...[G]iven the uncertainty surrounding the potential for domain name collisions, combined with the uncertainty over the potential impact of such collisions, *it is imperative for ICANN to conduct additional study on this issue*. USTelecom strongly urges ICANN to conduct a follow-up study to more fully understand the full spectrum of risks to private networks, equipment and devices posed by all new gTLDs and to develop appropriate mitigation measures as necessary.”
- [The Online Trust Alliance](#): “A single domain collision has the *potential to bring down the entire IT organization of an enterprise*... ICANN should undertake further study on this potentially serious and expensive remediation issue.”
- [The Chertoff Group](#) (a global security advisory firm headed by former Secretary of Homeland Security Michael Chertoff, and whose team includes former CIA Director Michael Hayden): “...we believe it is *prudent to conduct additional analysis on the security and liability risks* associated with these new gTLDs, particularly with regard to key resources and critical infrastructure.”
- [The American Insurance Association](#): “...the current 21-day *comment period provides insufficient time to research this issue*. We ... respectfully request that ICANN grant an extension of time” [to conduct research].
- [The United States Council for International Business](#): “we feel the ICG *study does not provide sufficient analysis of risks* to internal namespace posed by a broad range of new gTLDs.”

I am sure you will agree that it is compelling when U.S. government officials; electricity providers; national security experts; telecommunications providers; insurers; Internet users; large manufacturers; national advertisers; and groups representing business generally stress that a major deployment of new gTLDs could pose serious risks and that the rush to roll them out will expose consumers, businesses and users of the Internet to major risk of harm. The concern about ICANN’s plans is growing and very serious.

Common in all of these comments is the suggestion that ICANN should step back, collect more information, and assess the potential implications *before* delegating new strings into the root. If not, the very stability and security of the Internet will be jeopardized. ANA again urges ICANN to

heed these warnings and not launch a vast array of new gTLDs until all the needed security and safety analyses have been completed and adequate protections have been put in place. ICANN should heed the observation of its own consultant in the ICG study and perform additional qualitative analysis of the potential for (and impacts of) name collisions prior to delegating new gTLDs. This is ICANN's responsibility, and is essential to the stability and security of the Internet.

I appreciate your attention to this letter, and of course will discuss this matter with you should you desire. ANA continues to believe strongly that a major roll out of new gTLDs before these stability and security issues are resolved would be premature and highly risky.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Jaffe". The signature is fluid and cursive, with the first name "Dan" being more prominent than the last name "Jaffe".

Dan Jaffe
Group Executive Vice President, Government Relations
Association of National Advertisers