



August 27, 2013

Mr. Cyrus Namazi
Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536

RE: Deadline Extension Request for the Solicitation of Community Comments on the Proposal to Mitigate Name Collision Risks

Dear Mr. Namazi:

Thank you for the opportunity to comment on this key issue impacting the Internet community. The Interisle Consulting Group clearly stated in the "Name Collision in the DNS Report" (the "Study") that **nearly all** proposed new gTLDs carry some risk of name clash and potential service interruptions. While we appreciate the candid admissions within the Study, the Study itself is woefully inadequate to gauge the level of risk associated with deploying new gTLDs. The Study's author readily admits that the underlying data only counted the number of **potential** name clashes. As a result, ICANN, as far as we are aware, has virtually no data to determine if it could interrupt important public safety communications, government web traffic, e-commerce applications, internal corporate communications or just casual web traffic by delegating new gTLDs.

This is unacceptable. ICANN plans to rank new gTLDs into three risk profiles: low risk and delegable (80% of the strings); uncalculated risk (20% of the strings); and high risk (2 strings). Unfortunately, ICANN appears to be ready to make this determination without sufficiently knowing what service interruptions could result once delegation occurs. ICANN must know what underlying services could potentially "break" on the Internet to begin to gauge risk. As stated by the Study's author:

The risk associated with delegating a new TLD label arises from the potentially harmful consequences of name collision, not the name collision itself. This study was concerned primarily with the measurement and analysis of the potential for name collision at the DNS root. **An additional qualitative analysis of the harms that might ensue from those collisions would be necessary to definitively establish the risk of delegating any particular string as a new TLD label,** and in some cases the consequential harm might be apparent only after a new TLD label had been delegated. See the Study, pages 2-3 (emphasis added).

Our member companies are working diligently to determine if DNS Clash issues are present within their respective networks. However the ANA had to communicate these issues to hundreds of companies, after which these companies must generate new data to determine the potential service failures on their respective networks. Our member companies and the

multitude of participants within the Internet community need adequate time to do this. The fact that our member companies are now forced to rush to conduct this analysis is all the more disappointing when it is realized that ICANN has been aware of the DNS clash issues since at least 2009 during the OARC Workshop in Beijing. See SAC045 - Invalid Top Level Domain Queries at the Root Level of the Domain Name System, <http://www.icann.org/en/groups/ssac/documents/sac-045-en.pdf>. ICANN, in 2009, could have conducted additional research to ascertain the breadth of the problem, and reached out to companies and better publicized the risk. ICANN's failure to do so means that many companies are learning about these DNS clash issues for the first time now on the eve of new gTLD deployment.

On August 9th, the ANA wrote ICANN seeking an extension of the period for public comments on ICANN's Proposal to Mitigate Name Collision Risks. We renew this request to extend the public comment period to November 1st for initial comments and November 22nd for reply comments (a copy of our letter is appended).

ANA, and its member companies, are of course standing by ready and willing to work with ICANN, but we need time to produce the necessary data. Without the data on potential service interruptions, ICANN's proposed risk categories are unfortunately simply an insufficiently researched estimate of potential risks and harm. ICANN's primary mission under the Affirmation of Commitments is to maintain Internet security and stability in the public interest. Such a responsibility demands far more than a weakly researched estimate. Without this data, we believe it would be highly risky and imprudent to go forward with a general rollout of new gTLDs.

Respectfully submitted,

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Daniel L. Jaffe
Group Executive Vice President, Government Relations



August 9, 2013

Mr. Fadi Chehadé
President and CEO
Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

Dear Fadi:

On behalf of the Association of National Advertisers (ANA), I write to express our support for ICANN's solicitation of public comments on ICANN's Proposal to Mitigate Name Collision Risks, issued on August 5.

The report cited in this solicitation, as well as concerns raised by ANA and others involved with gTLD issues, raise significant issues that are highly important to the stability and security of the Internet. In addition, the report itself states that, "the delegation of almost any of the applied-for strings as a new TLD label would carry some risk of collision." Though perhaps varying in their impacts, the possibility of name collisions and their effects raise very technical issues that even the most sophisticated companies and other interested stakeholders must take time to assess.

The 21-day comment period proposed by ICANN for the receipt of comments on these very important matters is wholly inadequate. The limited time period, the difficulty of properly analyzing impacts and ICANN's proposed mitigation steps, and the mere reality of personnel absences due to summer vacations dictate that it will be virtually impossible for interested parties to be able to conduct the analysis and submit comments within the time provided.

Consequently, ANA requests that the period for filing such comments be extended, and that comments be eligible to be received until November 1 (with reply comments eligible to be received until November 22). This extension should permit sufficient analysis and participation by those most likely to be affected by these potentially harmful name collisions.

I request that this letter be posted on ICANN's website at the appropriate place so that all stakeholders are aware of our communication to you.

Thank you for considering an extension of the period for filing comments. Please do not hesitate to contact me if you would like additional information on this matter.

Sincerely,

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

Dan Jaffe
Group Executive Vice President
Association of National Advertisers