

Fadi Chehadé
President and CEO
ICANN

Amsterdam, 11 September 2013

Re: ICANN [Proposal to Mitigate Name Collision Risks](#)

Dear Fadi,

We would like to bring to your attention the fact that the ICANN [Proposal to Mitigate Name Collision Risks](#), as available on the ICANN website, is severely flawed.

In APPENDIX A – NOTIFICATION REQUIREMENTS, it is proposed that...

“Registry operator will notify the point of contact of each IP address block that issue any type of DNS requests (the Requestors) for names under the TLD or its apex. The point of contact(s) will be derived from the respective Regional Internet Registry (RIR) database.”

As was already pointed out in detail in [the comment from the RIPE NCC](#), dated 25 August 2013, the RIR databases in the majority of cases do **not** contain the needed information on the “point of contacts of IP addresses that issue DNS requests for an un-delegated TLD or names under it.”

Attaining this information will include a significant effort of all involved, including frequent and costly requests to parties not related to the New gTLD process, namely the holder of address **blocks** (as opposed to individual addresses originating DNS requests) registered in the RIRs’ databases.

The process as detailed in the proposal is bound to lead to disappointment, frustration, and significant exposure to lawsuits; we request that the information in the above mentioned comment is made available explicitly to the Registry Operators. Better still, the Proposal should be retracted or modified.

I’m looking forward to your comments.

Kind regards



Axel Pawlik
Managing Director
RIPE NCC