



Mr. Paul Twomey  
President & CEO  
ICANN  
4676 Admiralty Way  
Marina del Rey, CA  
USA

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CORE++ Asociación sin Ánimo de Lucro  
c/o Cuatrecasas  
Passeig de Gràcia 111; Planta 16  
E-08008 Barcelona  
Spain  
<http://www.core-plusplus.net>

Dear Paul,

ICANN's process to handle the selection process for the .net registry has been based on the principle of transparency. ICANN and the evaluators deserve credit for their use of explicitly stated criteria and for publishing the scores and the reasoning behind them.

However, the Evaluation Report as submitted by Telcordia is seriously flawed. The flaws are such that it cannot stand as a basis for preference between any of the five candidates for the .net registry operation.

Some of these flaws are addressed here. It is a non-exhaustive list of the different type of mistakes, misunderstandings and omissions contained in the report. There are many more, indeed. For instance, the fact that VeriSign is granted a blue flag for policy compliance. CORE++ appreciates the humorous approach, but combined with the lack of a single reference to some remarkable incidents such as SiteFinder, it leaves anyone wondering what was the exact goal of the whole exercise.

With regard to this issue of the incorrectly raised red flag, CORE++ requests that it be expressly removed, and the corrected Report re-published.

#### **A. Choice of Scoring Criteria**

Score sheet gives disproportionate weight to Verisign-advertised benchmarks, many of which are irrelevant, while missing out on known shortcomings of the registry model created by Verisign. Examples are database transaction performance and Whois update delay. The benchmark strongly advertised by Verisign was used in the report, while the one showing Verisign's weakness was not. The evaluators and ICANN do not seem to be sufficiently aware of the fact that the Verisign-advertised benchmark is largely irrelevant, whereas the absent

criterion is important to registrants and registrars. On the other hand, the Whois update delay is a problem to all users of DNS, regardless of whether they had registered a domain with VeriSign or not.

A closer analysis of the scoring criteria shows that the same underlying criterion is indirectly counted multiple times. For instance, several criteria are mere reflections of the fact that an organization has been awarded a large gTLD before.

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## **B. Misinterpretations and Errors**

Any analysis is subject to the danger that the data used in it has been affected, be it transmission problems or just plain misunderstandings.

This has led, among other things, to an unjustified "red flag" for CORE++ and an unjustified "yellow flag" given to DENIC. Their origins are simple misunderstandings between the candidates and the evaluators. CORE++ is convinced that both cases are purely accidental. However, the likelihood of such a misunderstanding is of course much higher for candidates from another country (and cultural context, including business culture) than the evaluators or candidates who are less familiar with language of US government contractors.

These misunderstandings would have been avoided or overcome if the evaluators had been able to communicate properly with the candidates. The preliminary scoring sheets were ready prior to the site visit but not sent out. CORE++ learned about the existence, not the content, of the preliminary scoring sheet during the site visit. When the CORE++ team finally saw the preliminary scoring, there were only 2.5 days (60 hours) left to respond to numerous issues raised by the evaluators. Many issues contained references to the proposal in the form of page numbers, but as the proposal was submitted as a web form, the page numbers could often not be resolved.

To say the least, the communications between the evaluators and the candidates were error-prone. This is not the evaluators' fault, nor that of the candidates. But communications errors in the evaluation process should not be the basis for the assignment of the .net registry.

## C. Individual Issues

For the benefit of the ICANN board, here is a (non-exhaustive) list of pointers to individual issues identified in the Report.

### 1.3 Evaluation Procedure (DNS)

The description of the evaluation procedure seems to correspond to the intended process, as opposed to the procedure actually followed. CORE++ understands that the evaluators intended to have the preliminary scoring sheet sent prior to the site visit. This would have enabled the visiting evaluators to clarify questions. The visiting evaluators actually asked us whether we had received the preliminary scoring sheet.

#### 2.5.3 Performance (DNS)

Under this heading, the following ratings were assigned:

Afilias	CORE++	DENIC	Sentan	VeriSign
green	red	green	blue	blue

The red flag – the only red flag in the report – was assigned to CORE++ with the explanation: “failure to use the measurement methodology specified in the .pro, .biz and .info appendix D.” This must be a misunderstanding. CORE++ had provided its responses in view of the fact that will use industry standard measurement techniques, which certainly involves as a minimum those specified in the contract.

CORE++ has mentioned more than once in the application and also in the response to the interim report that CORE++ uses the infrastructure of some root name server operators. The responsible manager is ISC (Paul Vixie). It is obvious to mention that methods of monitoring exist. CORE++ assumed that Telcordia is familiar with the root name server system. In addition the usage of RIPE’s Dnsmon as an external neutral observer was explained. The answer focused therefore on what CORE++ proposal specifically adds to generally accepted methodology.

To give a red flag here is entirely inappropriate. The red flag should be a green or blue flag instead: both for the service and for the added guarantee through the independence of the monitoring. The question was of the type "how do you get there from here", and it was shown how the destination point would be reached. The fact that it was emphasized that CORE++ also used a different road than the one assumed by the evaluators cannot lead to a red flag. Which criterion counts: attaining the goal? Or following the expected methodology, and only that methodology?

There must be a misunderstanding somewhere. And one that unduly affects not just CORE++ but also the image of some fundamental infrastructure providers. This is why CORE++ cannot leave the unfairly assigned flag unchallenged.

### 2.5.5 Registry-Registrar Model and Protocol, SRS

Under this heading, the following ratings were assigned:

Afilias	CORE++	DENIC	Sentan	VeriSign
green	green	blue	blue	blue

The difference shown in expected SRS availability are not significant enough to justify and differentiation. They are more a question of how availability is measured and how conservative a candidate's statement is. There are no practical advantages between those levels of availability. The evaluators actually express their own doubts as to whether there is any practical significance to the availability figures. But the differentiated flag colors have not been removed.

### 2.5.6 Database Capabilities

Under this heading, the following ratings were assigned:

Afilias	CORE++	DENIC	Sentan	VeriSign
green	green	yellow	blue	blue

In this context, Verisign receives marks for useless capability, or capabilities whose only effect is to favor a few companies specialized in deleted-domain hammering. The database transaction figures shown by Verisign are artificial. They will go way as soon as the most elementary steps are taken to deal with

deleted names. Verisign should actually receive negative marks for its lack of will to meaningfully deal with hammering. Verisign's motivation in this respect is clear: high transaction numbers impress the impressionable, both in view of WLS and in view of the .net reassignment.

Brute-force transaction-throughput is hardly an unquestionable capability. The transactions advertised by Verisign are in actual fact of a type that does not change the database content. If suddenly they were actually mostly used to create, modify or delete database objects, there would rapidly be other performance problems unless some throttling were introduced.

### 2.5.7 Geographic Network Coverage

Under this heading, the following ratings were assigned:

Afilias	CORE++	DENIC	Sentan	VeriSign
green	green	green	blue	green

This rating fails to address CORE++' geographic network coverage. It is better than Sentan's. Geographic diversity and distribution is one of the key features of CORE++ project.

### 2.5.8 Billing and Collection

Under this heading, the following ratings were assigned:

Afilias	CORE++	DENIC	Sentan	VeriSign
green	green	green	blue	blue

All applicants use the same system, whose essence is pre-payment. CORE++ is the only one who specifically adds innovative features to facilitate real-time accounting by registrars.

It is ludicrous to give marks to Verisign for having shown an "actual invoice": any business is capable of sending invoices.

### 2.5.13 Whois

Under this heading, the following ratings were assigned:

Afilias	CORE++	DENIC	Sentan	VeriSign
green	green	blue	blue	green

The analysis fails to address Verisign's shortcomings: Verisign has a track record of a long-delayed Whois server update; Verisign often publishes incorrect expiration date resulting from registry-initiated auto-renew; Verisign offers a thin registry only where others offer thick model or even, in the case of CORE++, the thin-and-thick model where the registrar or the customer can choose.

CORE++ can also add additional whois servers at any time, as can all. All except VeriSign should logically have blue marks.

### 2.5.18 IDN, IPv6, DNSSEC

Under this heading, the following ratings were assigned:

Afilias	CORE++	DENIC	Sentan	VeriSign
green	green	green	blue	blue

None of the applicants can claim any differentiating achievements here, except for the negative track record of Verisign in IDN (Verisign's lack of will to address homograph issue caused severe setback for IDN as a whole. The same applies to its imposition of pre-standard "RACE-encoded" IDN in 2000 and 2001.

The system of CORE++ is ready for IPv6 from the beginning. It was one of the technical design goals. CORE++ also has in its application a detailed plan to deploy DNSSEC (including mechanics for the chain from the registry to the registrant). IDNs are essential for CORE++ and are also described in the application. These three items should be reflected in the scoring of CORE++ in a blue flag.

### 2.6.3 Security

Under this heading, the following ratings were assigned:

Afilias	CORE++	DENIC	Sentan	VeriSign
green	green	green	green	blue

This rating is based on the number of top-ratings in 18 sub-criteria, but the report does not say how applicants scored in a given sub-criteria. CORE++ is reported to have "poor rating in one criterion even after response to preliminary evaluation report" but no indication is given of which sub-criteria, nor the measurement methodology. Applicants need to know more about the evaluation here.

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## 2.8 Migration Plan

Under this heading, the following ratings were assigned:

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Afilias	CORE++	DENIC	Sentan	VeriSign
blue	green	green	blue	blue

It is inappropriate to give Verisign a blue rating for not having to do a migration. While a migration requires effort on all participants, it is a useful drill and a useful gain of experience for the DNS as a whole. It is also a useful mechanism to demonstrate that a given vendor is replaceable. CORE++ has demonstrated experience with migration of databases. From a public-policy decision-making process standpoint, it is inappropriate to favor a candidate because it has already been favored before. Yet this would be the case if ICANN took into account the .org and .us migrations as differentiating elements while ignoring comparable experience elsewhere.

## D. Conclusions

It is evident that the ranking of the participants will be different if the above issues and errors under heading C above, and issues pointed out by other candidates, are taken into account. This, however, does not take care of the bias in the choice of criteria.

As pointed out above, the choice of the criteria strongly favors Verisign in particular or US government contractors in general. The choice of Telcordia as

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an evaluator predefined this in many ways. The mechanism is not through an actual conflict of interest, but the similar mindset. Imagine asking a Scotsman whether wine is better than whisky, or the reverse. The answer is quite predictable. As predictable as when you ask the same question to a Frenchman. But in this case it will likely be the exact opposite. Even in absence of bad faith, the nature of the questions and the person providing the answers largely predetermine the outcome. Those criteria, evaluated by Telcordia, could only produce that result.

And the result is a score that literally stands in strict inverse correlation to a candidate's geographical distance from the Washington, DC Beltway area. This is something that should seriously worry ICANN and lead to a thorough reconsideration of the evaluation process.

Yours truly

A handwritten signature in blue ink, appearing to read "Elmar Knipp".

Elmar Knipp  
Chief Executive Officer  
CORE++

CC: Mr. John Jeffrey, General Counsel; Kurt Pritz, Vice President, Business Operations, ICANN