The Internet Corporation for Assigned Names and Numbers

ICANN

7 April 2013

Dear Mr. Keith Drazek:

Thank you for your letter dated 18 March 2013, sent on behalf of the members of the Registries Stakeholder Group (RySG), in which implementation issues are raised on a number of topics. We appreciate the time that you spent compiling your ideas and the thoughtful considerations that you outlined for each of these topics. We did want to note that we published many of the documents you and others have been requesting, specifically the "Pre-Delegation Testing Specifications", the "Query by Proxy Approach for Pre Delegation Testing" and updated the "Instructions: Data preparation for Pre-Delegation Testing". We hope this collection of documents alleviates many of the concerns you have raised. Additionally we are in the midst of the Pre-Delegation Testing Pilot with 12 applicants, all backed by a different registry service provider, which we believe will provide great learning to further improve the process and system. We would like to address the issues described in your letter.

1. Test Plan Documentation

   As mentioned above, the Test Specifications were published on 20 March. These are available under the resources section of the Pre-Delegation page on the new gTLD Program microsite. This collection of specifications includes the "Master Test Plan", the "Level Test Plans" and the "Level Test Cases." Additionally, the specifications for the details of "query-by-proxy" were published on 5 April 2013 as a standalone document titled "Query by Proxy Approach for PDT". We understand the concerns of the applicants and registries that these documents were not available sooner. We have been working with the Pre-Delegation Testing service provider and industry experts to produce high quality specifications, which meet the requirements of the gTLD Applicant Guidebook.

2. Load Capacity Testing

   We understand the concern that services may be impacted without knowledge of the information "load" that will be processed during the test. The information is now available in the Test Specifications documentation published on 20 March. It should be noted that this is a test on self-certification documentation; therefore, the registry operator is in full control on the conditions of the test. As explained in section 8.5 of the previous response to the RySG, Load Capacity Tests are to utilize production infrastructure, however they may be performed on out-of-service servers.

3. Reachability Documentation

   ICANN is committed to safeguard the security of the information it is being provided during Pre-Delegation Testing. We have strict non-disclosure agreements and data retention policies in place

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via our contract with the Pre-Delegation Testing Provider, Stiftelsen för Internetinfrastruktur (.SE) and use industry best practices to ensure the protection of the confidentiality of sensitive information. The testing is designed to achieve the requirements as outlined in section 5.2.1 of the Applicant Guidebook. Furthermore, we do not plan to request this information from every applicant. It will only be requested in special cases, such as when an on-site audit is conducted as specified in the Applicant Guidebook.

4. TCP and DNSSEC Capabilities

The Pre-Delegation Testing system is divided in three decoupled sub-systems in order to minimize exposure to outside threats. The front-end system as seen by the applicant/registry it is only concerned with allowing data input. After the data submission period closes, the data is migrated to secure internal systems – dedicated for testing – and no longer available in the front-end system. A third-party security audit has been performed on these systems.

5. TCP and DNSSEC Capabilities

The publication of the "Query by Proxy Approach for Pre Delegation Testing" identifies the details of "query-by-proxy" approach for the DNS anycast testing and should address concerns regarding its nature. It should be noted that applicants/registries have the option to simply allow direct queries to the Anycast instances, if they prefer.

6. TCP and DNSSEC Capabilities

We understand the viewpoint that simple queries of the Internet-facing name server addresses on the globally Anycasted addresses would yield representative consumer-centric results. However the purpose of Pre-Delegation Testing is to verify that the applicant has met its commitment to establish registry operations in accordance with the technical and operational criteria described in Module 2 of the gTLD Applicant Guidebook. We hope the published Anycast query-by-proxy approach addresses your questions about the inner-workings of this test.

7. Tests Against Existing Infrastructure

Please see the answer to #2 above.

8. IDN Table Testing

We understand your concerns regarding IDN table testing. Our recently published Test Plan Documentation should address the questions of how IDN tables will be tested. Note that, per the new gTLD base Registry Agreement, IDN tables must comply with the IDN Implementation

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Guidelines. In order to help applicants/registries prepare for the IDN portion of the test we are considering releasing an automated tool to help self-check their IDN tables.

9. Trademark Clearinghouse

    Registry interaction with the Trademark Clearinghouse is not a component of Pre-Delegation Testing.

ICANN has scheduled a Pre-Delegation Testing session during the Beijing meeting, which is designed to help applicants/registries prepare for testing. The session will include a tutorial of the system and lessons learned from the PDT Pilot. We would encourage RySG members to attend the session.

We greatly appreciate your feedback. Thank you for your participation in ICANN's multi-stakeholder model.

Best regards,

Akram J. Atallah
Chief Operating Officer, ICANN