

August 24, 2016

VIA EMAIL

Members of the ICANN Board
ICANN
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094
Correspondence@ICANN.org

Dear Members of the ICANN Board,

The undersigned gTLD applicants request that the Board take formal action to commission an examination of mitigation measures that will enable the release of .HOME, .CORP, and .MAIL. Based on data now available from the launch of hundreds of gTLDs that have undergone a period of controlled interruption without incident and a host of other factors, it is incumbent upon the Board to review the status of .HOME, .CORP and .MAIL and proceed to the timely disposition of these strings. The facts now make the continued moratorium on the launch of these gTLDs no longer reasonable; such a ban does a great disservice to applicants, the community, Internet users worldwide and to ICANN itself.

.HOME, .CORP, and .MAIL were originally put on the high-risk list due to an anticipated combined effect of conflict with internal name certificate authority use and the number of queries to the root where no name existed (sometimes referred to as “name collisions”).¹² The unreliability of self-assigned certificates, however, was mitigated last year with the reassignment of certificates to internal names and private IP addresses (i.e., for internal networks). This effective mitigation, coupled with the completion of controlled interruption of new gTLDs without incident, presents evidence that risks anticipated by the JAS report³ were grossly overstated.

These results, at a minimum, call for a new examination to determine whether the basis for the Board’s earlier decision to stymie .HOME, .CORP, and .MAIL remains valid, and whether the

¹ “This study focused on two specific consequences of name collision in the DNS:

- name resolution ambiguity with respect to private network pre-delegation uses of names that become new TLD labels, and
- the pre-delegation use of proposed TLD strings in names incorporated into X.509 public key certificates

Name Collision in the DNS, 2 August 2013 (<https://www.icann.org/en/system/files/files/name-collision-02aug13-en.pdf>) at 53.

² “A policy decision that name collision consequences that affect security should be the dominant risk factor might lead to the designation of the strings that appear most frequently in internal name certificates (corp, mail, exchange, hsbc, and cba, for example) as “high risk”...” Id. at 83.

³ *Mitigating the Risk of DNS Namespace Collisions*, 4 June 2014 (the “JAS Report”) (<https://www.icann.org/en/system/files/files/name-collision-mitigation-study-06jun14-en.pdf>).

original assumptions and recommendations continue to hold, given current experience. Just as the name collision issues were mitigated in all other gTLDs, the same likely is true for these three gTLDs.

In cases like IPv6 and universal acceptance, ICANN has accepted that it is possible to change widespread behavior and has participated in efforts to do so. The industry has proven time and time again that changing behavior through mitigation processes is, in fact, possible and should be encouraged with regard to these gTLDs.

In 2014, ICANN, in its name collision occurrence management framework, referred this issue to the IETF for consultation on name collision mitigation:

5. HIGH-RISK STRINGS (MAIL) Following the recommendation from SSAC to identify strings that should be reserved for private use and the proposal in the JAS report, ICANN will treat mail the same as home and corp, i.e., defer delegating this string indefinitely. ... *ICANN will collaborate with the technical and security community to identify the best way to handle these strings, e.g., reserve them permanently through IETF process.*⁴

To our knowledge, however, this consultation has borne no fruit.

Similarly, the JAS report – also now two years old – recommended referral of the collision issue to the IETF, to determine whether RFC1918 treatment should apply:

RECOMMENDATION 1: The TLDs .corp, .home, and .mail be referred to the Internet Engineering Task Force (IETF) for potential RFC 1918-like protection/treatment.⁵

It is now evident that the IETF has not and is not likely to recommend indefinite reservation. Indeed, there is no consensus within the IETF to take any action whatsoever with regard to these gTLDs, and so they linger in an indefinite state of reservation. And, unfortunately, it appears that ICANN has taken no further steps to collaborate with the “technical and security community to identify the best way to handle these strings...”.⁶ Two years have passed—the Board should not allow such idleness to stand.

Rather than continued inaction, ICANN owes applicants for .HOME, .CORP, and .MAIL and the public a plan to mitigate any risks and a proper pathway forward for these TLDs.

For the reasons herein, including all the information we have learned in the over two years since these gTLDs were put on hold, we request that the Board commission a timely examination of mitigation measures that will enable the release of .HOME, .CORP, and .MAIL.

⁴ *Name Collision Occurrence Management Framework* (the “ICANN Framework”), 30 July 2014, emphasis added (<https://www.icann.org/en/system/files/files/name-collision-framework-30jul14-en.pdf>).

⁵ JAS Report at 5.

⁶ ICANN Framework at 4.

Thank you for your time and consideration,

.Home Registry Inc. (Applicant for .HOME)
Baxter Pike, LLC (Applicant for .HOME)
Dot Home LLC (Applicant for .HOME)
DotHome Inc. (Applicant for .HOME)
Dothome Ltd. (Applicant for .HOME)
Lifestyle Domain Holdings, Inc. (Applicant for .HOME)
Merchant Law Group LLP (Applicant for .HOME)
Top Level Domain Holdings Limited (Applicant for .HOME)
Uniregistry, Corp. (Applicant for .HOME)
Cotton Fields, LLC (Applicant for .CORP)
Dot Registry LLC (Applicant for .CORP)
NU DOT CO LLC (Applicant for .CORP)
GMO Registry, Inc. (Applicant for .MAIL)
Victor Dale, LLC (Applicant for .MAIL)
White Pages TLD LLC (Applicant for .MAIL)

cc: John Jeffrey, General Counsel & Secretary
Akram Atallah, President, Global Domains Division