



VIA E-MAIL

May 17, 2013

Dr. Stephen Crocker, Chairman of the Board of ICANN
Mr. Fadi Chehadé, President & CEO
Mr. Cherine Chalaby, Chairman of the New gTLD Committee
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

Re: Google's Proposed Dotless Domain Amendment to its .search gTLD Application

Dear Dr. Crocker, Mr. Chehadé and Mr. Chalaby:

Microsoft Corporation ("Microsoft") is writing to express its continuing concern over Google's proposed [amendment](#) (through its Charleston Road Registry subsidiary) to run its gTLD application for .search as a "dotless" domain, as its plan is likely to run counter to the 23 February 2012 recommendations of the SSAC in [SAC053](#). As detailed below, Microsoft strongly urges ICANN to follow the advice of the SSAC and ensure that dotless domains are only used in the private space.

Google sent a letter to the ICANN Board on April 6, 2013 requesting permission to expand its application for .search to run this TLD as a dotless domain (<http://search/>). Dotless domains are currently used as intranet addresses controlled by private networks for internal use. Google's proposed amendment would interfere with that private space, creating security vulnerabilities and impacting enterprise network and systems infrastructure around the globe.¹

In 2012, the SSAC advised against dotless domains in SAC053 (linked above). The report included input from Google experts, and concluded that dotless domains would create significant security risks and recommended "strongly against their use." Specifically, the SSAC stated that dotless domains "would not always work as expected" and "would lead to unpredictable and unexpected dotless domain behavior." Google agreed as a contributor to the Report, and also stated in additional comments to the public forum on this topic that "such an evolution would be actively harmful." In fact, all three major internet browser developers, Google (Chrome), Microsoft (Internet Explorer), and Mozilla (Firefox), agreed with the SSAC's conclusions through submissions to the public forum.

¹ Microsoft submitted more extensive comments on the dangers of dotless domains as part of a public forum on this topic, available [here](#).

Google's .search application amendment actively contravenes the security, stability, and reliability concerns raised by the SSAC and its contributors, and explicitly proposes using technical specifications (such as AAAA records) that the SSAC advised against. Further, Google failed to acknowledge its prior positions or the SSAC Report in its April 6, 2013 letter. Google's about-face in applying for .search as a dotless domain is likely to harm the internet ecosystem and should be rejected out of hand, as should similar requests by any applicants in the future.²

If ICANN would like further direct dialogue with Microsoft on technical aspects of the dotless domain issue, we are happy to make engineers available. Meanwhile, if you have questions or comments, please do not hesitate to contact either myself, M3 Sweatt (msweatt@microsoft.com) or Russell Pangborn (russpang@microsoft.com).

Thank you for your consideration.

Yours Truly,

✕

David Tennenhouse
Corporate Vice President, Technology Policy
Microsoft Corporation

Cc:
Andrew Maurer, Australian GAC Representative
Peter Nettlefold, Australian GAC Representative
Heather Dryden, Chair of the GAC
Suzanne Radell, US GAC Representative
Cyrus Namazi, Vice President, DNS Industry Engagement

² Microsoft also notes that ICANN has not formally responded to the SSAC report or the numerous comments submitted to the public forum on this topic. Microsoft therefore renews its request of Sept 21, 2012 for a contractual prohibition against dotless domains.