
Name Collision

1. Introduction

The delegation of almost any new generic top-level domain carries some risk of name collision, which happens when a name that is used in one namespace (e.g., an internal network) may be used in a different namespace (e.g., the Global DNS).

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In order to assess and mitigate this risk, ICANN has implemented the **Name Collision Risk Management** framework, following recommendations from the Name Collision Analysis Project Study Two Report¹, as directed by the ICANN Board on 7 September 2024².

All applied-for gTLD strings must be assessed in this framework before being approved for contracting and delegation.

This section of the Applicant Guidebook describes this framework, and the procedures that will be used to assess and (if necessary) mitigate any Name Collision risks associated with such strings.

2. Applicant Access to Longitudinal Risk Data

Before the opening of the application submission period, ICANN org will provide applicants with datasets related to all strings above a certain threshold of query volume that may help applicants to assess the risk of name collision.

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Applicants should note that the metrics for an applied-for string are only one of several factors, both quantitative and qualitative in nature, that will be considered when assessing the risk associated with that string.

Applicants should also note that out of the approximately 1,400 unique strings that were applied for during the last round, only three (.corp, .home, and .mail) were assessed to be high-risk³. Nevertheless, applicants should not assume that if the datasets indicate a low volume of name collision occurrences that the string will be assessed as safe to be delegated.

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3. Initial Assessment of Applied-for Strings

Each applied-for string (and any variants) will undergo an initial risk assessment by an expert evaluator using relevant data sets that can be procured, e.g., root server logs, and DNS recursive server logs, using both volume and diversity of queries, origins, query names (labels), and query types; Identifier Technologies Health Indicators (ITHI)⁴ data sets; and qualitative evidence that can help deduce the severity of harm. The purpose of this assessment is to preliminarily identify **high-risk strings**.

¹ <https://www.icann.org/en/system/files/files/ncap-study-2-report-05apr24-en.pdf>

² <https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-07-09-2024-en>

³ For further information about how Name Collisions were managed during the last round, see <https://www.icann.org/resources/pages/name-collision-2013-12-06-en>.

⁴ <https://ithi.research.icann.org/>

Strings assessed to be high-risk will be placed on the Collision String List (see [Section 5](#)) and any applications that include these strings, either as a primary string, or any of its variants, will not proceed until a High-Risk String Mitigation Plan has been approved and implemented.

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Initial Assessment will take place following the [\[String Confirmation Day\]](#). ICANN will publish a report describing the assessment, its methodology, and findings, once completed. A Public Comment period will be carried out for the report to allow the community to provide feedback on the methodology and findings.

4. Temporary Delegation and Final Assessment

Strings (including variants) that are not identified as high-risk during the initial assessment (see Section 3) will be queued for **temporary delegation**. Strings will undergo temporary delegation in priority order of the applications for that string.

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The rate at which strings will be temporarily delegated will be limited to ensure that the DNS root zone does not grow by approximately more than 5% per calendar month.

During temporary delegation, the applied-for gTLD string will be delegated to DNS nameservers managed by ICANN org in order to collect data about the volume and nature of DNS traffic for that string.

ICANN will evaluate the data collected during temporary delegation, that includes DNS queries to TLD servers, diversity of queries, origins, query names (labels), query types, etc. to determine whether the string will be:

- Designated as high-risk (resulting in it being placed onto the Collision String List), in which case the string will be immediately removed from the root zone; or
- Eligible to proceed with the remainder of the application processing.

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Irrespective of the outcome of temporary delegation, ICANN will produce a report outlining the findings, which will be published for applicants and other interested parties to review.

5. The Collision String List

ICANN org will maintain a **Collision String List**, which is a list of strings which ICANN has determined to present a high risk of name collision.

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Applications for strings on the Collision String List may not proceed until such time as a **High-Risk String Mitigation Plan Review** has been approved and implemented for that string.

5.1. High-Risk String Mitigation Plan Evaluation

The applicant for a string on the Collision String List that has cleared contention may amend their application to add a High-Risk String Mitigation Plan, which will then be reviewed. This review is subject to an additional fee [insert reference to fee section].

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Applicants must submit change request to add a Mitigation Plan within 3 months (extendable upon reasonable request to 6) of (a) the designation of the string as High Risk or (b) contention

resolution (if applicable). If the change request is not submitted within this time frame, the application will not proceed.

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The applicant will be provided with all relevant non-personal data generated during the initial assessment and/or temporary delegation of the string to assist in developing the Mitigation Plan.

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The Mitigation Plan submitted by the applicant must contain at minimum the following:

1. A summary of the findings from the Initial Assessment, and, if applicable, of the Technical Review Team's findings during Temporary Delegation;
2. A Root Cause Analysis which identifies the underlying reason why Name Collisions may occur for the string;
3. A Mitigation Plan, which outlines the specific preventative and corrective actions the applicant will take to mitigate the risk of Name Collision. Each mitigation action must have a specific timeframe for implementation. The total time frame must not exceed two years.

The Mitigation Plan will be reviewed by a panel of technical experts, who may if necessary, advise the applicant on possible improvements to it. In the event that amendments are required, a further 3 months will be allowed for such amendments.

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Within the Mitigation Plan, applicants may identify sections which contain information which, if published, could undermine the effectiveness of the plan-such as where it might allow a malicious actor to interfere with mitigations- and mark these sections for redaction. If the panel agrees, the marked sections will be redacted before publication.

If the mitigation plan contemplates mitigation activities that take place before the delegation of the string, then the application will not proceed until those activities have taken place, and their effectiveness has been confirmed using the same criteria used during the initial assessment.

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In cases where ICANN determines that a mitigation measure must for technical reasons be implemented after the string is delegated to the registry operator (after evaluation has been finalized), e.g., if the name collision issues are limited to a second level name that the registry agrees to never delegate, the application may be allowed to proceed with the remainder of the application processing as long as the applicant agrees to add relevant requirements to their registry agreement to implement the name collision mitigation measures.

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Once a mitigation plan is completed, ICANN will carry out a review, resulting in a determination as to whether the string can be removed from the Collision String List, and the corresponding application can proceed with the remainder of the application processing. The review will determine whether the plan (a) correctly identifies the root cause of the collisions and (b) has a high probability of being effective.

6. Challenges to the Mitigation Plan Evaluation

The applicant will be given the opportunity to challenge the outcome of a Mitigation Plan Evaluation if it believes the panel has made a factual or procedural error when it determined that the Mitigation Plan (a) does not correctly identify the root cause of the collisions or (b) does not have a high probability of being effective.

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The Evaluation Challenge will be assessed under a "clearly erroneous" standard of review. Specifically, the Evaluation Challenge Service Provider must accept the panel's Expert Determination unless: (1) the panel failed to follow the appropriate procedures, or (2) failed to consider/solicit necessary material evidence or information.

The deadline for filing a challenge will be within **[21 days]** from the date the applicant receives notice of the evaluation determination it seeks to challenge.

If the Evaluation Service Provider Finds a factual, procedural, or system Error, the mitigation plan will be reevaluated.

The Evaluation Service Provider will communicate the conclusions resulting from the Evaluation Challenge within **[30 days]** of an applicant filing such a challenge. ICANN will post the results of the Evaluation Challenge.

7. Interaction with IDN Variants

All applied-for strings, including IDN variants, will be assessed for name collision risk through the initial assessment and temporary delegation processes outlined above.

If either a primary or variant label is found to be high risk, then the application cannot proceed until the Mitigation Plan Review process has been carried out. However, if the label is a variant label, then the application may be amended to remove that label, allowing the amended application to proceed.