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## AT-LARGE ADVISORY COMMITTEE

### ALAC Statement on the Proposal to Mitigate Name Collision Risks

#### Introduction

Julie Hammer, ALAC Liaison to the SSAC and At-Large member from the Asian, Australasian and Pacific Islands Regional At-Large Organization (APRALO) composed an initial draft of this Statement after discussion of the topic within At-Large and on the Mailing Lists.

On 17 August 2013, this statement was posted on the [At-Large Proposal to Mitigate Name Collision Risks Workspace](#).

On 19 August 2013, Olivier Crépin-Leblond, Chair of the ALAC, requested ICANN Policy Staff in support of the ALAC to send a Call for Comments on the draft Statement to all At-Large members via the [ALAC Announce Mailing List](#).

On 22 August 2013, a version incorporating the comments was posted.

The Chair of the ALAC requested that ICANN Policy Staff in support of the ALAC open a five-day ratification vote on the Statement.

On 27 August 2013, Staff confirmed that the online vote resulted in the ALAC endorsing the Statement with 14 votes in favor, 0 votes against, and 0 abstentions. You may review the result independently under: <http://www.bigpulse.com/pollresults?code=3328kmcHSE5UbULmpXGLU8AZ>

#### Summary

1. The ALAC welcomes the completion and publication of the "[Name Collisions in the DNS](#)" study report by Interisle Consulting Group and the subsequent response by ICANN in "[New gTLD Collision Risk Management Proposal](#)."
2. The ALAC wishes to reiterate its previous Advice to the Board that, in pursuing mitigation actions to minimize residual risk, especially for those strings in the "uncalculated risk" category, ICANN must assure that such residual risk is not transferred to third parties such as current registry operators, new gTLD applicants, registrants, consumers and individual end users. In particular, the direct and indirect costs associated with proposed mitigation actions should not have to be borne by registrants, consumers and individual end users.
3. The ALAC remains concerned that this matter is being dealt with at such a late stage of the New gTLD Process. The ALAC urges the Board to investigate how and why this crucial issue could have been ignored for so long and how similar occurrences may be prevented in the future.

The original version of this document is the English text available at <http://www.atlarge.icann.org/correspondence>. Where a difference of interpretation exists or is perceived to exist between a non-English edition of this document and the original text, the original shall prevail.

## **ALAC Statement on the Proposal to Mitigate Name Collision Risks**

The ALAC welcomes the completion and publication of "[Name Collisions in the DNS](#)" study report by Interisle Consulting Group and the subsequent response by ICANN in "[New gTLD Collision Risk Management Proposal](#)." The ALAC advises that it is in general concurrence with the proposed risk mitigation actions for the three defined risk categories. In doing so, the ALAC recognizes that the study, its conclusions, and ICANN's risk mitigation recommendations are based on analysis of a limited data set of query volume metrics, i.e. how many times queries occur for a proposed new gTLD. As acknowledged in the study, such metrics are only one perspective of risk and do not reflect other risk that may arise through complex interactions between the DNS and applications at the root level. In particular, the ALAC wishes to reiterate its previous Advice to the Board that, in pursuing mitigation actions to minimize residual risk, especially for those strings in the "uncalculated risk" category, ICANN must assure that such residual risk is not transferred to third parties such as current registry operators, new gTLD applicants, registrants, consumers and individual end users. In particular, the direct and indirect costs associated with proposed mitigation actions should not have to be borne by registrants, consumers and individual end users. The Board must err on the side of caution and ensuring that the DNS under ICANN's auspices remains highly trusted.

On a more general note, the ALAC remains concerned that this matter is being dealt with at such a late stage of the New gTLD Process. The ALAC urges the Board to investigate how and why this crucial issue could have been ignored for so long and how similar occurrences may be prevented in the future.