

Summary Report of Public Comment Proceeding

Proposed Definition of Name Collisions and Scope of Inquiry for the Name Collisions Analysis Project																			
Publication Date:	12 September 2019																		
Prepared By:	Danielle Rutherford																		
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Section I: General Overview and Next Steps																			
<p>This Public Comment proceeding sought feedback on the Security and Stability Advisory Committee (SSAC)'s definition of name collision and scope of inquiry for the Name Collision Analysis Project (NCAP).</p> <p>The document defines name collisions in general and in the context of top-level domains. The scope of inquiry divides the problem space into three areas: in scope and subject of data studies by NCAP, in scope but not intended to be the subject of data studies by NCAP, and out of scope.</p> <p>The NCAP discussion group will finalize the definition of name collision and scope of inquiry for the NCAP after considering public input.</p>																			
Section II: Contributors																			
<p><i>At the time this report was prepared, a total of three (3) community submissions had been posted to the forum. The contributors, exclusively organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.</i></p> <p>Organizations and Groups:</p> <table border="1"> <thead> <tr> <th>Name</th> <th>Submitted by</th> <th>Initials</th> </tr> </thead> <tbody> <tr> <td>At-Large Advisory Committee</td> <td>ICANN Policy Staff in support of the At-Large Community</td> <td>ALAC</td> </tr> <tr> <td>Non-Commercial Stakeholders Group</td> <td>Rafik Dammak</td> <td>NCSG</td> </tr> </tbody> </table>				Name	Submitted by	Initials	At-Large Advisory Committee	ICANN Policy Staff in support of the At-Large Community	ALAC	Non-Commercial Stakeholders Group	Rafik Dammak	NCSG							
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Section III: Summary of Comments

General Disclaimer: This section intends to summarize broadly and comprehensively the comments submitted to this Public Comment proceeding but does not address every specific position stated by each contributor. The preparer recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

Overall, the comments are supportive of both the name collision definition and the scope of inquiry for the Name Collision Analysis Project (NCAP):

- “We appreciate the need to have a Name Collision definition for purposes of scoping the inquiry for the NCAP, in order for the NCAP Study One to be manageable and on point. Therefore, the ALAC supports the Proposed Definition of Name Collision and Scope of Inquiry for the Name Collision Analysis Project of 1 July 2019.”
- NCSG stated “regarding the Scope of Inquiry itself, after reading the available documents, including reports from NCAP, we did not reach any proposed changes to what was already stated. An attempt towards reducing the Scope of Inquiry even further could go against the Board's criteria of a thorough study, which ultimately would be counterproductive.”

Both groups included comments regarding the potential alterations to the scope of inquiry:

- The ALAC commented it would like to see the Scope of Inquiry amended “should further pertinent information come to light at a later stage” including the ongoing work of the NCAP Discussion Group, NCAP Working Party, input obtained from the party/ies eventually contracted to undertake NCAP study 1, and/or the results of study 1.
- The NCSG commented that “expanding [the Scope of Inquiry] any further most likely will raise an already high budget, alongside increasing the chances of failure under any of the risks previously mentioned in this Statement” and that after previous reduction in scope for study 1 “the NCSG believes that the expansion or reduction of the Scope of Inquiry would cause several problems and risks towards the three studies that the NCAP must conduct.”

Section IV: Analysis of Comments

General Disclaimer: This section intends to provide an analysis and evaluation of the comments submitted along with explanations regarding the basis for any recommendations provided within the analysis.

While both groups expressed support for the proposed definition of name collisions and scope of inquiry for the NCAP, the groups expressed different opinions on further amending the scope of inquiry.

The ALAC expressed interest in seeing the scope of inquiry expand to include Type B Situations (in scope but not intended to be the subject of data studies) in data studies if compelling cases arise within study 1. Additionally, the ALAC commented about the possibility of amending the scope should pertinent information emerge during study 1.

However, the NCSG commented the further restriction of scope to remove topics that are within topic but not to be included in data studies was a prudent choice given the risk assessment submitted by the NCAP earlier in the year. The NCSG further commented, “the NCSG believes that the expansion or reduction of the Scope of Inquiry would cause several problems and risks towards the three studies that the NCAP must conduct.”

Next Steps: The NCAP discussion group will incorporate feedback from this Public Comment proceeding to continue the work of NCAP. The definition of name collision and scope of inquiry will be incorporated into the three studies proposed by NCAP.