23 April 2014

Dr. Stephen D. Crocker
Chair, ICANN Board of Directors
12025 Waterfront Drive, Suite 300, Los Angeles CA 90094-2536

Via email.

Dear Dr. Crocker,

IDN ccTLD Delegation

I refer to ICANN's recent announcement that the IDN ccTLD Request from Macedonia, The Former Yugoslav Republic of, had successfully completed string evaluation for their IDN ccTLD. I anticipate that as a result of this announcement the ICANN Board will soon be asked to consider the merits of approving the delegation of this IDN ccTLD request.

Therefore, I would like to take this opportunity to reiterate my comments made during the Public Forum in Buenos Aires regarding the ICANN Board's obligation to treat all TLDs equally in matters of security and stability of the Internet. My comments were made in light of the ICANN Board's decision to delegate the IDN ccTLD for Iran absent any assessment of the potential for name collisions, at the same time the New gTLD Program Committee had agreed to delay the delegation of new gTLDs in order to investigate name collisions. At the time, Akram Atallah responded that the number of delegations anticipated under the new gTLD program represents a higher probably of abuse and therefore a higher risk of name collision, than the single dot Iran IDN ccTLD. However, I would argue that potential risk to the security and stability of the Internet associated with the delegation of any TLD, can only be determined, at this time, by undertaking an assessment of the potential for name collision.

I understand that during an NGPC meeting on 7 November 2013, prior to my comments at the Public Forum, the SSAC Liaison to the ICANN Board, Ram Mohan, in speaking about the merits of the New gTLD Collision Occurrence Management Plan suggested that while the plan is technically sound, it should include the implications of the delegations of ccTLDs. He further suggested that the name collision issue be overseen by the ICANN Board Risk Committee since the issue is beyond just new gTLDs. The NGPC subsequently recommended to the ICANN Board that the ICANN Board Risk Committee expressly review the matter and report back to the Board. Akram Atallah confirmed this in part of his response to my comments that "… this will be one of the risk issues that we will be addressing in the Risk Committee within the next few days."

It would appear that the Risk Committee has discussed the name collision issue on two occasions: 16 November 2013 and 5 February 2014, but due to the brevity of the minutes it can only be assumed that no substantive discussion occurred. Given the seriousness of this issue the lack of progress   is disappointing, particularly when requests for IDN ccTLDs are still being received and evaluated.

I continue to strongly believe that the ICANN Board has an obligation to treat all TLDs equally in matters of security and stability and that when the Board does consider future requests to delegate IDN ccTLDs that the evaluation report must include an assessment of the potential impact of name collisions and that any necessary mitigations be applied consistent with the requirements under the new gTLD program. Anything less would appear to be abrogation of the ICANN Board's collective responsibility to the global Internet using community.

Yours sincerely,

Adrian Kinderis
Chief Executive Officer
ARI Registry Services