

6 October 2014

Dr. Stephen D. Crocker

Chair, ICANN Board of Directors
12025 Waterfront Drive, Suite 300, Los Angeles CA 90094-2536

Via email

IDN ccTLD Delegation

Dear Dr Crocker

I refer to my previous [letter](#) to you on this topic dated 23 April 2014. I was reminded this week when I saw announcements relating to the successful completion of string evaluations for IDN ccTLDs for [Iran](#) and [Belarus](#) that I have not received a reply to my previous letter.

I would like to take this opportunity to again reiterate what I believe to be the ICANN Board's obligation to treat all TLDs equally in matters of security and stability of the DNS and that this be taken into account when the Board considers delegation reports for the IDN ccTLDs for Iran, Belarus and Macedonia, The Former Yugoslav Republic of, respectively. I particularly request that this be the case now that the ICANN Board's New gTLD Program Committee (NGPC) had adopted the Name Collision Occurrence Management Framework which requires, among other things, that TLD operators undertake a 90 day controlled interruption period prior to launching their TLD in order to mitigate against any name collisions.

I acknowledge that the NGPC also resolved to "... direct the President and CEO, or his designee(s), to continue to provide briefings and share information and best practices with ccTLD managers concerning name collision issues in light of the Name Collision Occurrence Management Framework." I would certainly appreciate some insight into what this information and best practice for ccTLD managers will contain and how ICANN will work with yet to be delegated IDN ccTLDs to adopt this best practice.

I well understand the longstanding view that ICANN does not have any direct authority over the management or operation of ccTLDs; however, when it comes to the security and stability of the DNS it would appear that the ICANN Board and former CEO Rod Beckstrom set a precedent for intervening in ccTLD matters as they related to the use of 'wildcarding'.

In June 2009, the ICANN Board passed the following resolutions:

Resolved (2009.06.26.19) that new TLDs, including ASCII and IDN gTLDs and IDN ccTLDs, should not use DNS redirection and synthesized DNS responses. Staff is directed to revise the relevant portions of the draft Applicant Guidebook to prohibit such redirection and synthesis at the top-level for new gTLDs, and to take all available steps with existing gTLDs to prohibit such use.

Resolved (2009.06.26.20), the Board further directs staff to communicate and disseminate in July 2009 the concerns regarding harm caused by the redirection and synthesizing of DNS responses with appropriate parties, including the ccNSO, ccTLD operators and the GAC, who might be able to ensure measures are taken to assure the integrity of error responses as well as name resolution for ccTLDs.

Resolved (2009.06.26.21), the Board requests that the ccNSO provide a report on mechanisms that could be employed to ensure that redirection and synthesis at the top level is effectively prohibited.

Resolved (2009.06.26.22), the Board invites the GAC to consider what measures could be taken to alleviate harm that can be caused by redirection and synthesis of DNS responses at the top level.

I would also draw your attention to the circumstances surrounding the redelegation of .co ccTLD where it would appear that the CEO at the time, Rod Beckstrom, intervened in the redelegation process to seek the explicit agreement of the Columbian Government that the practice of 'wildcarding' would not be undertaken in the operation of the ccTLD. This is evidenced in a [letter](#) from Maria Del Rosario Guerra, Minister of Information and Communications Technologies, Republica de Colombia, dated 3 December 2009. Unfortunately, I cannot find the original correspondence from Mr Beckstrom on ICANN's correspondence page.

In my mind, this example begs the question why ICANN could not adopt a similar strategy for new ccTLDs when it comes to name collisions, given the requirements imposed on new gTLD registry operators, but more importantly given ICANN's critical mission to maintain the security and stability of the DNS.

I look forward to your response on this matter.



Adrian Kinderis
CEO
ARI Registry Services