Registries Stakeholder Group Statement

Name Collision Analysis Project (NCAP) Study 2 Documents

Date statement submitted[1]: **18 March 2022**

Reference url: *https://www.icann.org/en/public-comment/proceeding/name-collision-analysis-project-ncap-study-2-documents-27-01-2022* .

Background[2]

The NCAP Discussion Group is seeking input on two draft work products that contribute to the NCAP Study 2 goals to understand how measurements taken at various layers of the DNS hierarchy convey the impact of name collisions, and to understand the impact of name collisions:

- **A Perspective Study of DNS Queries for Non-Existent Top-Level Domains**
  This study aims to understand the distribution of DNS name collision traffic throughout the DNS hierarchy and provide insights into where and how DNS data can be collected and assessed.
- **Case Study of Collision Strings**
  Case studies of .corp, .home, .mail, .internal, .lan, and .local using DNS query data from A and J root servers. The case studies highlight changes over time of the properties of DNS queries and traffic alterations as a result of DNS evolution.

Related RySG comments

- RySG comment on the **Draft Project Plan for the Proposed Name Collision Analysis Project (NCAP)** (April 2018)

Registries Stakeholder Group comment*

Summary of Submission:

The Registries Stakeholder Group (RySG) welcomes the opportunity to comment on these draft work documents and thanks the NCAP Discussion Group for their diligent work. The RySG wishes to strongly support the conclusion in the Case Study that the work on name collisions by Interisle and JAS is still relevant today and supports retaining controlled interruption, recognising it is an effective tool for identifying name collisions.

[1] *This is a copy of the comment submitted via the ICANN Public comment platform.*
[2] *Background: intended to give a brief context for the comment and to highlight what is most relevant for RO's in the subject document – it is not a summary of the subject document.*

The Registries Stakeholder Group (RySG) welcomes the opportunity to comment on these draft work documents and thanks the NCAP Discussion Group for their diligent work. The RySG is mindful that the Board will review these studies when assessing whether any further steps on name collisions should be taken and wishes to share the following considerations in this perspective.

The RySG wishes to strongly support the conclusion in the Case Study that the work on name collisions by Interisle and JAS is still relevant today. The Case Study notes that "[w]hile there are notable differences in data sets and anomalies, both the measured potential impact and projected harm essentially agree between the earlier studies and today" (p29). In other words, evolution in DNS traffic has not altered to a detectable level whether there is a name collision risk or not.

The last decade has provided ICANN with experience and more data after delegating over 1,200 TLDs. This data shows that only a small proportion of TLDs delegated since 2014 were affected by name collisions, as highlighted in the NCAP Study 1, and "[o]f all the reports to ICANN, only one led to action by a registry". Further, even where there are name collision issues, ICANN has a form available for reporting, https://www.icann.org/en/forms/report-name-collision, and has published guidance on identifying and mitigating different kinds of name collisions https://www.icann.org/en/system/files/files/name-collision-mitigation-01aug14-en.pdf.

The RySG is of the view that caution should be taken when determining whether to make material alterations to controlled interruption. In this instance there is data that supports the maintenance of the existing procedures. These studies indicate that in most instances the existing controlled interruption process is an effective tool, but there may be some small improvements that could potentially be adopted to improve controlled interruption in light of changing traffic patterns. The RySG supports retaining controlled interruption, recognising it is an effective tool for identifying name collisions. The RySG encourages the NCAP Discussion Group, and ultimately the Board, to resist the urge to let perfect be the enemy of the good by adding unnecessary complexity to controlled interruption procedures and creating a new process. The RySG is supportive of the NCAP Discussion Group continuing with the hypothesis that "controlled interruption is effective" based on the data.

The RySG once again thanks the NCAP Discussion Group for their diligent work on this topic and looks forward to the draft NCAP Study 2 report .