

## [comments-name-collision-26feb14]

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### ISPCP Public Comments to JAS Report

- *To:* "comments-name-collision-26feb14@xxxxxxxx" <comments-name-collision-26feb14@xxxxxxxx>
- *Subject:* ISPCP Public Comments to JAS Report
- *From:* Christian Dawson <dawson@xxxxxxxx>
- *Date:* Tue, 1 Apr 2014 06:14:31 +0200

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What follows is comments from the Internet Service Providers & Connectivity Providers (ISPCP) constituency:

- 1) Thanks to ICANN and JAS for their hard work.
- 2) If Controlled Interruption moves forward in the manner suggested by the JAS report, every possible second level domain would be delegated by wildcard (or every domain on the block list for those already delegated) to 127.0.53.53. There should be an exception process for delegations where the nature, and source of the requests to the root zone have already been narrowly identified and where the registry requests or accepts to not delegate all names. Otherwise, the Controlled Interruption may create risks without any additional value, and network operators will be warned of collisions that are likely to never come, causing untold amounts of work from sysadmins for no tangible benefit.
- 3) If Controlled Interruption moves forward in the manner suggested by the JAS report, a feedback loop needs to be developed to determine the ongoing efficacy of the program. By gathering and processing data about response to the Controlled Interruption process, we can get smarter and more efficient about minimizing the risk of collisions in the future.
- 4) One thing we like about Controlled Interruption via 127.0.53.53 IF it proves effective is that it makes the problem easily identifiable, so that solutions can be found via search engine by sysadmins. Whatever methodology moves forward must have the network sysadmin in mind, and must give the sysadmin who is likely unfamiliar with new gTLDs a pathway to identify and solve issues as quickly and easily as possible.
- 5) We will never have sufficient data to know for certain what will break during delegation. We ought to focus as much of our attention as possible on documentation and outreach. The report states the outreach done to date, and that's a good start. These efforts need to continue to grow over time and cannot end when the full report is issued.

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