



Comment on Identifier Technology Health Indicators: Definitions

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Business Constituency Submission

GNSO//CSG//BC

Background

This document is the response of the ICANN Business Constituency (BC), from the perspective of business users and registrants, as defined in our Charter:

The mission of the Business Constituency is to ensure that ICANN policy positions are consistent with the development of an Internet that:

1. promotes end-user confidence because it is a safe place to conduct business
2. is competitive in the supply of registry and registrar and related services
3. is technically stable, secure and reliable.

Comment

The BC welcomes the opportunity to comment on ICANN's Identifier Technology Health Indicators (ITHI) initiative and the proposed description of five (5) "diseases that could affect the health of the name part of the system of unique Internet identifiers." (Comment page is at <https://www.icann.org/public-comments/ithi-definition-2016-11-29-en>)

As members of the global business community, we are well-acquainted and supportive of the value of labels. After all, in order to be managed, resources and processes need to be measured. And to be measured, they must be defined.

For these reasons, over that last six years, the BC has addressed, and returned to address, the kinds of problems the ITHI initiative was designed to define and label:

- In 2010, the BC filed public comments on Registration Abuse [Policies](#);¹
- In 2013, the BC filed public comments on Whois Privacy/Proxy [Abuse](#);²
- And just this year, the BC filed public comments on DNS [Abuse](#).³

Though filed individually, these prior BC comments reflect a consistent set of guidelines that, if adhered to, would go a long way in mitigating the diseases listed by the ITHI. In the view of the BC, DNS abuse can be curtailed if:

1. All data are accurate;
2. There is a program of authenticated access to that accurate data;
3. All available data that does not contain personally identifiable information (PII) or business-sensitive information can be analyzed for traits, trends and insights by the community; and
4. The community, along with ICANN compliance, are empowered to review such data and potentially redress deficiencies.

¹Mar-2010, at http://www.bizconst.org/assets/docs/positions-statements/cbuc_position_rap_initial_report.pdf

² Nov-2013, at <http://www.bizconst.org/assets/docs/positions-statements/business-constituency-comment-on-study-of-whois-privacy1.pdf>

³ May-2016, at http://www.bizconst.org/assets/docs/positions-statements/2016/2016_05may_bc-comment-on-safeguards-to-mitigate-dns-abuse.pdf

In the view of the BC, authenticated access to accurate data for analysis and integrity would eliminate many of the dark corners that now exist. These dark corners allow bad behavior and DNS abuse to take root and grow.

In the view of the BC, the problems are, or ought to be, well-known and better understood. The key is to be clear in their definition and description. And to do so in ways that are relatable to the entire community.

The BC believes that using human disease analogies and the medical profession's practice of labeling diseases with Latin phrases does more to distance than to engage the community in a search for successful treatments.

It is the recommendation of the BC that the labels be simpler and more straightforward. In this way, there can be less risk of confusion, which often gets in the way of solutions.

Consider the five (5) "diseases" proposed by the ITHI:

1. Datamalgia, defined as "pain from bad data," is really just a symptom of inaccurate WhoIs data. As the number of accuracy requirements grows, such as those specified in the recently approved Privacy and Proxy Services Issues Accreditation Issues (PPSAI) final report, the pain from bad data will become acute.
2. Abusitis or abuse infection, is when domains are used for the purpose of spam, phishing, malware, botnets, command/control, or other abusive behavior. For the sake of consistency, the BC suggests that future health studies should be based, at a minimum, on the more complete list of abusive behavior as defined in Section 3(a) of the Public Interest Commitments (Specification 11).
3. Magnitudalgia, defined far too generally as "pain from quantity," is a by-product of accuracy and access.
4. Perfluism, or leakage, is nothing more than the name collision we have been monitoring since the launch of the new gTLD program.
5. Datafallaxopathy, defined as a "lying disorder," is just another symptom of the underlying architecture of ICANN's data collection, analysis and use.

Rather than seek to establish a new nomenclature, the goal should be to make the problems more understandable so as to draw the broadest participation of the community in reaching acceptable, shared solutions.

A good place to start would be to begin with clear and useful definitions of the ecosystem and "health," as it relates to Identifier Technology. ("Free from illness and injury" is not particularly helpful as applied to the domain name industry.) Once we determine these definitions based on objective, data-driven factors, then we can better address the applicable metrics regarding the precise levels of accuracy and stability, etc. to maintain a healthy ecosystem, and what levels would result in an unhealthy and unreliable system.

From there, the community can delve into further details regarding *causes* of breakdowns to the system, as opposed to the mere symptoms. For instance, with the current definition of "Abusitis," there is no

distinction between domain names that are actually being used/registered for the purpose of abuse, versus domains that are compromised. Clearly, the treatment should be different for each case.

Given the foregoing, it is the hope of the BC that ICANN can move quickly on the ITHI, investing less time in labeling problems that already have a name and more time in helping resolve them.

The BC requests that ICANN use an iterative approach to defining and implementing ITHI metrics, so data can be published sooner and evolve with ongoing feedback and assessment.

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This comment was drafted by John Berard and Denise Michel, with edits by Andy Abrams and Alex Deacon.

It was approved in accord with the BC charter.