The ICANN GNSO "Business Constituency"

Comment on Draft Project Plan for SSAC Proposed Name Collision Analysis Project

Status: FINAL

Version: 1

18-Apr-2018

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.

General Comment

The BC welcomes the opportunity to comment on the Security and Stability Advisory Committee (SSAC) Proposal for the Name Collision Analysis Project (NCAP)[1]. We generally support the proposed plan and, in particular, the attention given to transparency and community consultation. The proposed research is a large and important undertaking, which requires significant investment by the technical experts who will comprise the NCAP Working Party and community attention to ensure that the project remains on track and aligned with ICANN and the community's objectives. To these ends, we put forth the following high-level considerations as the SSAC works toward finalizing the NCAP proposal and initiating work.

Ensure that outputs serve the needs of ICANN as an organization and community.

While the NCAP Proposal is directly responsive to ICANN Board Resolutions 2017.11.02.29 - 2017.11.02.31, there remains a lack of clarity about how the outputs will be applied to the handling of the .home, .corp, and .mail strings, specifically, or name collisions, generally.

To the surprise of many, shortly following the passing of these resolutions, the Board separately passed a resolution indicating that the .home, .corp, and .mail TLDs--which at the time were indefinitely reserved--would not proceed to delegation despite that the NCAP had not been conducted or even scoped. Similarly, while the proposed scope of the NCAP extends beyond these strings to the impact of name collisions overall and potential mitigations, it is unclear whether the Board or the community intend for the findings to form the basis for a future Policy Development Process or other work.

These discrepancies are not the responsibility of the SSAC alone, whose proposal responds aptly to the request set forth in the Board resolution. However, given the high costs, the impact on volunteer time, and the significant risks outlined in the NCAP, the intended applications of the research should be articulated so that the community and research team can meaningfully consider whether the proposal is appropriately scoped and whether the objectives warrant the costs.

---

[1] ICANN public comment page, at https://www.icann.org/public-comments/ncap-project-plan-2018-03-02-en

Established shared expectations for how risks will be assessed and managed.

We appreciate the comprehensive outline of risks set forth in the NCAP and believe that understanding potential obstacles is critical to successful planning. However, we note the large number of "high risk" elements described in the proposal, in particular the availability relevant data, which could jeopardize the ability to successfully carry out the proposed study or compromise the meaningfulness of its findings.

We recommend that a framework be pre-established for how these risks will be managed if realized. Impact will inevitably be contextual as some risks may jeopardize the overall project, while others require minor readjustment. Still, it would be prudent to describe how these risks will be handled at a procedural level and how the community will be engaged. A potential approach would be to establish a checkpoint to review the NCAP proposal following the data collection phase to assess whether there is sufficient information to proceed with the full study as designed or whether adjustments must be made.

Ensure that work is carried out in a cost-conscious manner considering the overall budget.

The proposed three million dollar cost for the study is significant, particularly given ICANN's current budget environment and the NCAP's acknowledgement that actual costs could exceed projections. Given the scope of work, and costs associated with third party research, these costs may be necessary.

Notwithstanding, the NCAP Working Party should be sensitive to budget considerations and cost-saving opportunities as it plans its work. For example, while independent research and other specialized needs will require external sourcing, it is possible that administrative and project management functions could be furnished from ICANN's existing staff pool; similarly, while expertise is of the upmost importance, cost should remain an important consideration when weighing potential providers for the phases of independent study.

The BC applauds the thorough work that has gone into planning to date and encourages the SSAC and working party to weigh these considerations regarding objectives, risks, and costs as it moves forward with the final NCAP Proposal.

--

This comment was drafted by Stephanie Duchesneau.

It was approved in accord with the BC Charter.