NTAG (New gTLD Applicant Group) is a interest group of RySG (Registries Stakeholder Group) for new gTLD applicants. Considering the ongoing issues regarding namespace collisions, an workgroup (NCF - Namespace Collisions Framework) was formed to gather perspectives and provide responses to public comments on this matter.
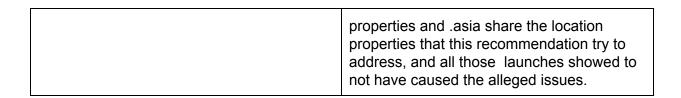
We, the NCF WG, welcome the publication of the updated "Risk of DNS Namespace Collisions Phase One Report" at https://www.icann.org/en/system/files/files/name-collision-mitigation-study-06jun14-en.pdf . Its acceptance of some of the public comments shows commitment to the multistakeholder model. Although some of our comments weren't accepted, so some of the community weren't also accepted. That's how it works.

We noticed though the untimely receipt of an SSAC Advice; it's unreasonable for them to reply to the report so late given the clear timeline that the board had previously published for action. It also hinders the parties abilities to reply to such comments; for instance, it prevented the WG from collecting full NTAG views on this topic.

We note that most SSAC recommendations were already addressed by the JAS report as listed in the table below:

SAC 062 Recommendation	NTAG NCF WG Comment
1 - Emergency Criteria	Already addressed by JAS Report (p. 12)
2 - Staggered Interruption Period	Already addressed by JAS Report (p. 9)
3 - Honeypot Usage	Already addressed by JAS Report (p. 23)
4 - IPv6	Already addressed by JAS Report (p. 21)
5 - RPM Clarity	This topic is unrelated to security and stability issues
6 - Wait beyond JAS Report	Delaying Tactic
7 - Phase 2 Report	Already addressed by JAS Report (p. 31)
8 - New gTLDs are allegedly different	Already addressed in part by JAS Report (p. 5 about .home/.corp/.mail and p.30 about collision in existing DNS namespaces), but we note that such comments are a recurring theme of Verisign Inc. public comments on this topic, so they were already taken into account by the process. We also note that .info, .museum and .jobs share the semantic

	properties and .asia share the location properties that this recommendation try to address, and all those launches showed to not have caused the alleged issues.

Besides one clear delaying tactic maneuver in recommendation 6, we find the untimely publication of said advice to also be an attempted delaying tactic; the advice signatories list speaks for itself.

We also noticed the lack of publication of the framework that would allow registries and registrants (both the ones with already registered but not activatable names and prospective ones) to move forward; it's imperative that ICANN moves quickly in producing an actionable framework to be sanctioned by NGPC and allow registries to both address possible security issues before they arise and allow registrants to use or get names they want to be their public-facing content and service names.

Before such framework is published, registries are blocked from using the wildcard mechanism, which is quoted in JAS report as being superior to Alternate Path to Delegation; any day of delay is one more day where such superior mechanism can't be used to prevent security issues for users.

Rubens Kühl
NTAG NCF WG Chair