

**“Name Collision” Issue for Blocked SLDs under “.政务”
and “.公益” TLDs**

Dear Mr. Chehadé,

First of all, I would like to thank you for your visit to China in February, which will definitely strengthen the partnership between CONAC and ICANN as well as bring the Chinese community closer to and more involved in ICANN.

I am writing to communicate the name collision issue, which was mentioned during your visit. As you may know, on 18 November 2013, ICANN published the name list of Second Level Domain (SLD) for all new gTLD applications that need to be blocked to avoid name collision. There are 3112 and 2808 SLD names respectively under “.政务” (.government and government affairs) and “.公益” (.public interest) TLDs that are on the block list, among which there are important domain names such as “.国务院.政务” (“.State Council. government and government affairs”).

As a matter of fact, those blocked SLDs under ".政务" and ". 公益" do not involve the name collision issue. As it is defined in the study by Interisle Consulting Group¹, name collision occurs when name resolution takes place in a semantic domain other than the one that was expected by a user. In other words, name collision is based on the premise that the SLD has more than two different records, and the user could be returned with an unexpected record. But in our case, any single SLD on the block list will be resolved to only one corresponding address, and is under CONAC's sole management. This is fundamentally different from the ICANN's definition of name collision.

The SLD block lists under our two TLDs result from CONAC's operation of test bed for ".政务" and ".公益" TLDs beginning in 2008. Some users' access request of the test bed created DNS root zone query log. Since CONAC has been officially authorized by ICANN as the registry for ".政务" and ".公益" TLDs, we will shut down the test bed and transit the operation of the TLDs to the root zone. To make the transition process smooth and without impairing the user experience, we need to follow the following steps.

1. ICANN unlock the SLDs under ".政务" and ".公益" TLDs.

¹ <https://www.icann.org/en/about/staff/security/ssr/name-collision-02aug13-en.pdf>

2. CONAC synchronizes the “.政务”and “.公益” test bed to the root zone files.

3. CONAC would monitor through logs, and when there are no DNS requests to the DNS system of the test bed, CONAC would halt the operation of the test bed.

Since the SLDs under our two TLDs are not name collision issue, I find ICANN's current mitigation measures could hardly address our concerns. On Feb. 26, 2014, ICANN published a report of Mitigating the Risk of DNS Namespace Collisions. The report correctly points out that DNS namespace collision is a pervasive occurrence, which will not put the security and stability of the global Internet DNS itself at risk. But the report, the recommendation 7 in specific --"registries publish appropriate A and SRV resource records for the labels in the ICANN 2LD Block List to the TLD's zone with the 127.0.53.53 address for a period of 120 days" is unworkable for our two TLDs, as which will stop the normal resolution of the blocked SLDs, and have negative impacts on user experience, especially when the users of these SLDs are government and public interest related.

We wholly support ICANN's many endeavors in maintaining the

security and stability of the internet and eliminating potential security risks of name collision. But given the fact that the blocked SLDs under ".政务" and ". 公益" TLDs have no risk of resolving to different addresses, and thus no risk of name collision, we would strongly encourage ICANN to consider the actual situation of the ". 政务" and ". 公益" TLDs, and to unlock the relevant secondary domains as early as possible so that we could make smooth transition from the current test bed to the root zone file, and launch our two TLDs at the earliest possible date.

We are open to questions and looking forward to your reply.

Sincerely,

A handwritten signature in black ink, appearing to be the Chinese characters ' Song Qing' (Song Qing) written in a cursive style.

Qing Song

Chief Executive Officer

China Organizational Name Administration Center