

Public Comment Summary Report

Name Collision Procedure Documentation

Open for Submissions Date:

Thursday, 29 January 2026

Closed for Submissions Date:

Monday, 16 March 2026

Summary Report Due Date:

Thursday, 09 April 2026

Category: Technical

Requester: ICANN org

ICANN organization contact(s):

globalsupport@icann.org

Open Proceeding Link:

<https://www.icann.org/en/public-comment/proceeding/name-collision-procedure-documentation-29-01-2026>

Outcome:

ICANN org extends its thanks to all commenters for their engagement with the Name Collision Procedure documentation and values the community's contribution to this important aspect of the New gTLD Program: 2026 Round. Having carefully considered all submissions received, ICANN org has determined that no specific changes to the Name Collision Procedure documentation are required at this time. The Operating Procedures and the High-Risk String Classification Model faithfully implement recommendations from the Name Collision Analysis Project (NCAP) Study 2 recommendations that were approved by the ICANN Board on 7 September 2024 (Resolutions 2024.09.07.10–12). ICANN is of the view that the framework already incorporates the safeguards and transparency measures sought by commenters.

One area has been noted for further consideration: ICANN org will examine what additional information should be included in public status updates when a string remains in Temporary Delegation beyond the expected 90-day period, including if an explanation for the extended assessment can be included.

Section 1: What We Received Input On

ICANN org sought input on the Name Collision Procedure documentation, which outlines how Name Collision assessments will be carried out for applied-for strings as part of the New

Generic Top-Level Domains (gTLD) Program: 2026 Round. The documentation comprises the Operating Procedures for the Initial Assessment, Temporary Delegation, and High-Risk String Mitigation Plan Evaluation, together with the impact-based High-Risk String Classification Model for identifying high-risk strings.

Section 2: Submissions

Organizations and Groups:		
Name	Submitted by	Initials
Registries Stakeholder Group (RySG)		RySG
Ethereum Name Service (ENS Labs, Ltd.)	Alexander Urbelis	ENS

Individuals:		
Name	Affiliation (if provided)	Initials
Benson King'Ori Mugure		BKM
Joyeeta Sen Rimpee		JSR

Section 3: Summary of Submissions

This section summarizes the submissions to your open proceeding but does not address every specific position.

Input Received	ICANN org input
<p>BKM 1: The decision-making process is highly layered. External panels do the initial groundwork, an internal "Technical Review Team" oversees them and requests changes, and a completely separate internal group called "Program Governance" makes the final binding decisions. One could argue this creates a slow or overly bureaucratic pipeline. The framework requires external experts to draft reports, the internal TRT to review them and ask "Clarifying Questions" (CQs), and a completely separate internal "Program Governance" group to make the final binding determination. While this separation of powers is likely designed to prevent conflicts of interest and ensure objective oversight, it builds multiple potential bottlenecks into the system.</p>	<p>The structural separation between external panels, the Technical Review Team (TRT), and Program Governance reflects ICANN org's operationalization of the NCAP Study 2 recommendations approved by the ICANN Board. The NCAP Study 2 Report recommended the establishment of a TRT (Recommendation 7, Section 5.7) while recognising that elements of judgment may belong to ICANN org (Introduction, p.5), and that the TRT should not have operational authority — leaving the specific governance arrangements to be determined during operationalization.</p> <p>The resulting RACI model set out in each Operating Procedure ensures that the parties performing assessments, those reviewing them, and those making binding determinations, remain distinct.</p>
<p>BKM 2: I think we should establish Strict Internal SLAs (Service Level Agreements):</p>	<p>ICANN org is committed to processing applications as efficiently as possible.</p>

Input Received	ICANN org input
<p>While the external panels have strict deadlines (e.g., 14 days to provide the Initial Assessment to the TRT, or 30 days to review a Mitigation Plan), there are fewer hard deadlines for how long the internal Program Governance group can take to adopt a report and make a final determination. I recommend establishing legally binding time limits for internal ICANN hand-offs.</p>	<p>However, internal governance steps are not amenable to rigid deadlines in all cases, as their duration may vary depending on the complexity of issues arising.</p> <p>To the extent this comment relates to provisions in the Applicant Guidebook (AGB) rather than to the Operating Procedures that are the subject of this proceeding, such matters fall outside the scope of this proceeding.</p>
<p>BKM 3: I also recommend Applicant Engagement. Currently, the TRT can issue clarifying questions to the external panels to resolve ambiguities. I recommend allowing the applicant to participate in these clarification dialogues directly, rather than waiting for a finalized report to be published before they can respond or initiate an Evaluation Challenge.</p>	<p>As multiple applicants may have applied for the same string, engaging selectively with any one applicant is inappropriate at the assessment stage. Applicant engagement is provided at later stages as appropriate, for example:</p> <ul style="list-style-type: none"> - Initial Assessment reports are published for Public Comment; - The Mitigation Plan Evaluation Panel communicates directly with applicants on identified issues and advises on improvements (Mitigation Plan Evaluation Operating Procedure, Step 3(d)).
<p>BKM 4: While the framework claims to rely on data, there is a large amount of human subjectivity built into the rules. For example, during the Temporary Delegation phase, the Technical Review Team is explicitly told to use its "professional judgment and experience" to decide how to collect data and monitor the string. Leaving data collection modes (No Interruption, Controlled Interruption, Visible Interruption, etc.) to the TRT's sole discretion without a standardized rubric makes the process vulnerable to inconsistencies. Perhaps the team should be tasked with coming up with a rubric for this first. I also recommend that the TRT publish their specific data-collection rubric and monitoring criteria for a string prior to initiating the Temporary Delegation. This ensures the applicant knows exactly what thresholds will trigger an emergency "kill switch".</p>	<p>The TRT's discretion over data collection modes during Temporary Delegation is not unlimited. The TRT must take into account available inputs (including the Initial Assessment report) and balance data collection needs against privacy and disruption risks — a safeguard reflecting the SSAC's advice in SAC124 on managing Assessment Risk alongside Delegation Risk. The ability to draw on professional judgment and experience is a deliberate and essential feature of the framework. Each applied-for string may present a unique risk profile, and prescribing a rigid rubric in advance would risk constraining the TRT's ability to adapt its approach. The NCAP Study 2 Report recognised this, noting that "which methods to use should be critically considered during the operationalization of the TRT" (Section 5.7) and that the NCAP Discussion Group deliberately refrained from prescribing implementation details so that ICANN org would retain the flexibility to refine methods based on operational experience.</p>

Input Received	ICANN org input
	<p>The High-Risk String Classification Model published as part of this proceeding also provides defined thresholds and guiding principles for the high-risk determination, and the Initial Assessment Operating Procedure requires that all analyses be documented using a structured approach to ensure consistency between evaluations. All reports are published for Public Comment, providing transparency on methodology and findings.</p>
<p>BKM 5: I also recommend that ICANN implement standardized, automated anomaly-detection algorithms for the initial quantitative data (like DNS Magnitude Data and DITL data) to minimize human bias before the qualitative assessment phase even begins.</p>	<p>The Initial Assessment Operating Procedure already defines clear quantitative thresholds for triggering further analysis. If the quantitative data shows no or only a small amount of sporadic queries above the visible threshold for the string, the string cannot be estimated to present a high risk and the Initial Assessment is concluded without further qualitative analysis (Initial Assessment Operating Procedure, Steps 2(d) and 3(a)). The determination of which strings require further scrutiny is therefore already grounded in observable, defined data thresholds rather than subjective judgment. Given this, ICANN org does not consider that additional automated anomaly-detection algorithms would materially improve the process.</p>
<p>BKM 6: The timeline for applicants can be extremely long. Between a 90 to 365-day live testing period, 30-day public comment periods for various reports, and allowing applicants up to two full years to implement their safety fixes, the process could significantly delay the roll-out of new internet infrastructure. Perhaps there should be a faster pathway that could include more participation from applicants.</p>	<p>The framework has been designed to balance thoroughness with efficiency, consistent with the Board-approved NCAP Study 2 recommendations. The Temporary Delegation Operating Procedure anticipates that where no signs of negative impacts or valid community reports of name collisions arise, the 90-day minimum period will be sufficient to conclude Temporary Delegation. The two-year timeframe referenced in Section 7.7.5 of the AGB is a maximum ceiling, not a prescribed duration — applicants that are able to implement their mitigation measures more quickly may do so, and the evaluation will proceed accordingly.</p>
<p>BKM 7: Create a "Fast-Track" for Zero-Risk Strings: If the Initial Assessment's</p>	<p>The NCAP Study 2 Report recommends that all applied-for strings undergo the Name</p>

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<p>quantitative data shows absolutely "no or only a small amount of sporadic queries", I recommend that these strings bypass the 90-day Temporary Delegation phase entirely and proceed directly to contracting.</p>	<p>Collision Risk Assessment workflow, which includes Temporary Delegation as an integral step (Recommendation 8, Section 5.8; Appendix 3). This was approved by the Board on 7 September 2024 (Resolutions 2024.09.07.10–12) and is reflected in AGB Section 7.7.3. Temporary Delegation serves a validation purpose that the Initial Assessment alone cannot replicate: pre-delegation data cannot capture what will occur once a string is live in the root zone, and the four data collection methods (NI, CI, VI, VIN) described in Appendix 2 of the NCAP Study 2 Report are specifically designed for this live-testing phase. Exempting any string from this step — regardless of its pre-delegation query volumes — is therefore not consistent with the Board-approved recommendations.</p>
<p>BKM 8: To address the 2-year mitigation timeline, I recommend a "Proactive Mitigation" pathway. Currently, an applicant must wait for their string to be officially flagged as high-risk and placed on the Collision String List before they can submit a High-Risk String Mitigation Plan. I propose allowing applicants who know their string will have high traffic to submit a Mitigation Plan concurrently with their initial application. This would allow the external panels to evaluate the root cause and the applicant's proposed fix immediately, shaving months or years off the back-end of the process.</p>	<p>Under the current framework, a Mitigation Plan must be informed by the specific findings of the Initial Assessment and, where applicable, Temporary Delegation — including a Root Cause Analysis identifying the underlying reasons why Name Collisions may occur for the string (AGB Section 7.7.5; Mitigation Plan Evaluation Operating Procedure, Step 3). A plan submitted before these findings exist would lack the evidentiary foundation for meaningful evaluation. Furthermore, the AGB requires that contention resolution for a string must be completed before a Mitigation Plan can be submitted (AGB Section 7.7.5), and the evaluation is subject to an additional fee (AGB Sections 7.7.5 and 3.3). These sequencing requirements make it neither practical nor cost-efficient for multiple competing applicants to develop and pay for the evaluation of Mitigation Plans before it is known which applicant will proceed with the string.</p>
<p>JSR 1: The current model defines "likely" as a "subjective probability of at least 66%". This lacks a standardized quantitative rubric, which may lead to the "inconsistent assessments between different evaluators" that the framework explicitly aims to avoid.</p>	<p>The use of "likely" as corresponding to a subjective probability of at least 66% is a standard formulation in risk management frameworks and is necessarily applied through expert judgment informed by the available evidence. This threshold does not operate in isolation: it is applied within the impact-based</p>

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	<p>classification model's defined guiding principles and illustrative criteria across two categories (impact on public safety and impact on public confidence). Consistency between evaluations is safeguarded by the requirement that all analyses be documented using a structured approach (Initial Assessment Operating Procedure, Step 2(c)), the assignment of at least two panelists for qualitative assessments (Step 4), and review by the TRT before publication for Public Comment.</p>
<p>JSR 2: While a list of "Essential Entities" is provided (e.g., energy, health, digital infrastructure), the documentation states it is "not an exhaustive list". There should be clearer criteria or a formal process for how new entities are added to ensure predictability for applicants across different regions.</p>	<p>The list of Essential Entities in the High-Risk String Classification Model is intentionally non-exhaustive because it is not possible to anticipate every category of entity whose disruption could affect public safety across all regions and sectors. The model does, however, provide a clear guiding principle for inclusion: entities with similar importance to public safety as those listed may be considered, and the list is anchored to internationally recognised frameworks (e.g., the US PDD 63 directive and the EU NIS2 directive). This approach ensures that assessments can account for regional and sectoral variations without being constrained by a closed list that may prove incomplete in practice.</p>
<p>JSR 3: The procedure allows applicants to redact sections of Mitigation Plans to prevent malicious interference. However, if these redactions are too broad, it prevents the community from providing meaningful feedback during the 30-day public comment period.</p>	<p>The redaction provision in AGB Section 7.7.5 is narrowly scoped. Applicants may identify sections that could undermine the effectiveness of the plan — such as where it might allow a malicious actor to interfere with mitigations — and mark those sections for redaction. Critically, redactions are not at the applicant's sole discretion. The TRT must agree that the marked sections warrant redaction before they are withheld from publication (AGB Section 7.7.5; Mitigation Plan Evaluation Operating Procedure, Step 4(c)(ii)). This safeguard ensures that redactions are limited to what is genuinely necessary to protect the integrity of the mitigation measures, while preserving the community's ability to</p>

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	provide meaningful feedback on the remainder of the plan.
<p>JSR 4: The framework mandates that mitigation implementation not exceed two years. There is no stated path for extensions for highly complex collision risks that might require more time to safely resolve.</p>	<p>The two-year maximum timeframe for mitigation implementation (AGB Section 7.7.5) reflects a deliberate policy choice to ensure that the mitigation of name collision risk does not indefinitely delay the delegation of new gTLD strings. The framework does provide flexibility within this period: applicants define the specific timeframes for each mitigation action within their plans.</p> <p>To the extent that this comment relates to the two-year limit set out in the AGB rather than to the Operating Procedures that are the subject of this proceeding, such matters fall outside the scope of this Public Comment.</p>
<p>JSR 5: When panelists investigate if queries can be attributed to specific "geographical regions, certain sectors or entities," the documents do not detail the specific privacy safeguards or data anonymization techniques used to protect end-user security.</p>	<p>The AGB addresses data protection requirements in the context of name collision assessments. Where data includes personal data and technical safeguards such as anonymisation or aggregation cannot be effectively applied, ICANN may request to enter into a Data Processing Agreement (DPA) with relevant parties (AGB Section 7.7.5).</p> <p>More broadly, balancing data collection needs against the privacy and security of end-users is an explicit requirement in the Temporary Delegation Operating Procedure (Step 3(a)(iii)), reflecting the SSAC's advice on managing Assessment Risk in SAC124. The specific technical measures employed will depend on the nature of the data collected and will be determined as part of the operationalization of the TRT, in compliance with applicable data protection requirements.</p>
<p>JSR 6: The decision to keep a string in Temporary Delegation for anywhere between 90 and 365 days is at the "sole discretion" of the TRT. Clearer milestones are needed to determine when 90 days is sufficient versus a full year.</p>	<p>The 90-to-365-day range for Temporary Delegation provides the TRT with the flexibility needed to assess strings with varying risk profiles. The Operating Procedure does provide a clear baseline expectation: where there are no signs of negative impacts from data collection and no valid community reports of name collisions, the 90-day period is</p>

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	<p>expected to be sufficient (Temporary Delegation Operating Procedure, Step 3(b)). Extensions beyond 90 days are anticipated only where the data warrants further monitoring, and in such cases ICANN is required to provide a public status update on the progress of the Temporary Delegation. As noted in the response to BKM 4 above, the ability to exercise professional judgment in light of each string's unique risk profile is a deliberate feature of the framework, as prescribing rigid milestones in advance would risk constraining the TRT's ability to adapt its approach as operational experience develops.</p>
<p>RySG 1: The most important parts of the Name Collision assessment should be conducted before the “Day in the Life of the Internet (DITL)” measurement (the DNS-OARC April event mentioned in the Name Collision Initial Assessment document on p.2). Only additional or supplementary assessments should take place afterward, and their results should be interpreted with caution. This would minimize opportunities for third parties to deliberately influence the assessment.</p>	<p>The Initial Assessment Operating Procedure identifies DITL data as just one of several data sources to be used alongside DNS Magnitude Data and other metrics from the Name Collision Observatory, ITHI data, and any other data sources deemed appropriate by the panel (Initial Assessment Operating Procedure, Step 2(a)). The procedure also requires the panel to consider longitudinal data to determine if and how queries for the strings may have shifted over time (Step 2(b)), and specifically addresses the risk of deliberate manipulation by requiring panelists to consider whether observed query patterns are in fact the result of deliberate deception intended to prevent a string from being delegated (Step 4(a)(iv)). The sequencing of data collection relative to specific measurement events is an operational matter for the TRT to determine as part of its assessment, taking into account the full range of available data sources rather than relying on any single dataset.</p>
<p>RySG 2: Under procedure 2, Temporary Delegation, a string may remain in the data collection and monitoring phase up to 365 days (point b on page 4). Fees paid for the integration in the TMCH during this period should be waived or deducted from the subsequent TMCH annual fee.</p>	<p>Temporary Delegation occurs prior to contracting; there will be no TMCH fees incurred during Temporary Delegation for a given string.</p>
<p>RySG 3: If the TRT decides that Temporary Delegation is required for longer than 90 days</p>	<p>The requirement for a public status update where Temporary Delegation extends beyond</p>

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<p>they should provide an explanation as to why. The document states that “ICANN will provide a public status update on the progress of the Temporary Delegation,” but this is somewhat vague and may not necessarily include an explanation of the underlying concern. If a string remains in Temporary Delegation for a longer period, additional periodic updates should also be provided.</p>	<p>90 days (Temporary Delegation Operating Procedure, Step 3(b)) is intended to provide transparency to applicants and the community. We note the suggestion that such updates include an explanation of the underlying concerns and that additional periodic updates be provided. This feedback will be taken into consideration in the operationalization of the reporting arrangements under this procedure.</p>
<p>ENS 1: The framework defines name collision to include collisions between the DNS and alternative naming systems, but the assessment tools are calibrated for traditional private-namespace leakage (.corp, .home, .mail). The 2026 round will include applicants who operate alternative naming systems with millions of pre-existing registrations under strings they seek to operate as gTLDs. Name collisions of this type have already occurred with the Handshake naming system. The current framework has no mechanism to assess this category of risk.</p>	<p>The Name Collision Risk Management framework is scoped to assess the risks arising from the delegation of new strings in the global DNS root — that is, collisions between the global DNS name system and any other naming system (NCAP Study 2 Report, Appendix 1; AGB Section 7.7). Where an applied-for string is in use within an alternative naming system, the resulting DNS query traffic might be visible in the data analysed during both the Initial Assessment and Temporary Delegation phases and the Initial Assessment Operating Procedure permits the panel to use any data sources found appropriate (Step 2(a)(iii)). The NCAP Study 2 Report acknowledged the existence of alternative naming systems and directed the TRT to note such systems as they are discovered in the data (Section 4.1). Identifying and mitigating collisions exclusively within alternative naming systems is, however, outside ICANN's remit (NCAP Study 2 Report, Section 4.1).</p>
<p>ENS 2: proposes eight recommendations:</p> <ol style="list-style-type: none"> 1. amend AGB Section 6.7.2 to enumerate qualitative evidence types; 2. require applicants to disclose alternative namespace operations; 3. expand the TRT's data sources beyond DNS query data; 4. publish the TRT's assessment methodology before the application window; 	<ol style="list-style-type: none"> 1. To the extent that this recommendation relates to provisions in the AGB rather than to the Operating Procedures that are the subject of this proceeding, such matters fall outside the scope of this Public Comment. We note, however, that the Initial Assessment Operating Procedure already sets out the qualitative factors to be considered by the panel (Step 4(a)) including geographic and sectoral attribution, semantic significance, impact on

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<ul style="list-style-type: none"> 5. create a pre-existing alternative namespace risk factor; 6. require overlapping namespace mitigation plans at application; 7. ensure the TRT can consult expertise in alternative naming and blockchain resolution; and 8. evaluate applicant track records, including strings previously launched and abandoned. 	<p>essential entities, and the possibility of deliberate deception.</p> <ul style="list-style-type: none"> 2. Application requirements and the information applicants are required to disclose are established in the AGB and fall outside the scope of the Operating Procedures that are the subject of this proceeding. 3. The framework already provides for this. The Initial Assessment Operating Procedure permits the panel to use "any other data sources as found appropriate" beyond the specified DNS Magnitude Data, DITL, and ITHI datasets (Step 2(a)(iii)). Similarly, the Temporary Delegation Operating Procedure permits additional data collection methods beyond the four specified methods, as deemed appropriate by the TRT (Temporary Delegation Operating Procedure, Section 3). 4. The assessment methodology is set out in the Operating Procedures and the High-Risk String Classification Model published as part of this proceeding. The AGB further provides that ICANN will publish datasets related to query volume before the opening of the application submission period to help applicants assess collision risk (AGB Section 7.7.1). The specific operational details of how the TRT applies these procedures will necessarily develop as operational experience is gained, consistent with the NCAP Study 2 Report's recognition that the operationalization of the TRT should retain flexibility (Section 5.7). 5. The High-Risk String Classification Model is impact-based: a string is classified as high-risk based on the severity, breadth, and persistence of the impacts that name collisions are likely to cause, regardless of the source

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	<p>of those collisions. Where a string's use in an alternative namespace generates visible DNS query traffic, this would be captured in the quantitative data and considered in the qualitative assessment. Creating a separate categorical risk factor is not necessary given the framework's existing focus on observable impacts.</p> <p>6. As noted in response to BKM 8 above, the framework requires that Mitigation Plans be informed by the specific findings of the Initial Assessment and, where applicable, Temporary Delegation. A plan submitted at the application stage would lack the evidentiary foundation for meaningful evaluation. Additionally, contention resolution must be completed before a Mitigation Plan may be submitted (AGB Section 7.7.5), and the evaluation is subject to an additional fee (AGB Sections 7.7.5 and 3.3).</p> <p>7. The NCAP Study 2 Report envisaged the TRT as a body with broad technical expertise and the ability to adapt its methods (Recommendation 7, Section 5.7). The Initial Assessment Operating Procedure provides that when additional panelists are assigned, any special competencies required for the assessment at hand shall be considered (Step 4). Nothing in the framework precludes the TRT or external panels from drawing on expertise in alternative naming systems where relevant to a specific assessment.</p> <p>8. Applicant evaluation criteria are established in the AGB and fall outside the scope of the Operating Procedures that are the subject of this proceeding. The Name Collision assessment framework is designed to evaluate the risk profile of applied-for strings</p>

Input Received	ICANN org input
	regardless of the track record of applicants.

Section 4: Analysis of Submissions

ICANN org received submissions from four commenters in response to the Public Comment proceeding on the Name Collision Procedure documentation, comprising a total of 25 distinct comments.

Of the 25 comments received, a number related to provisions in the AGB, fee arrangements, application requirements, or applicant evaluation criteria that fall outside the scope of the Operating Procedures under consultation. The remaining comments, which are within scope, can be broadly grouped under the following themes:

Governance and process efficiency. Several commenters raised concerns about the layered governance structure, the degree of transparency provided to applicants during Temporary Delegation, and the extent of applicant engagement during the assessment phases.

Objectivity and standardization of assessments. Multiple submissions questioned the degree of discretion afforded to the TRT in selecting data collection methods and the use of subjective probability thresholds in the High-Risk String Classification Model. Recommendations included the development of standardized rubrics, automated anomaly-detection algorithms, and more prescriptive criteria for the Essential Entities list and determining the duration of Temporary Delegation.

Mitigation Plan evaluation. One commenter raised concerns about the scope of permitted redactions in published Mitigation Plans and their potential effect on the quality of community feedback during the Public Comment period.

Privacy and data protection. One commenter raised concerns about the absence of detailed privacy safeguards in the procedure documentation for the qualitative assessment phase.

Alternative naming systems. One submission addressed the framework's capacity to assess collision risks arising from alternative naming systems, including the TRT's data sources and access to relevant expertise.

Determination

Having carefully considered all submissions received, ICANN org has determined that no changes to the Name Collision Procedure documentation are required at this time. The rationale for this determination is as follows:

The Operating Procedures faithfully implement the Board-approved NCAP Study 2 recommendations. On 7 September 2024, the ICANN Board adopted Resolutions 2024.09.07.10–12, approving all recommendations in the NCAP Study 2 Final Report (with the sole exception of Recommendation 4.1), accepting the SSAC's advice in SAC124, and directing

ICANN org to implement the approved recommendations. The Operating Procedures and the High-Risk String Classification Model published for this proceeding operationalize those recommendations as directed. The concerns raised by commenters regarding the governance structure, the TRT's exercise of professional judgment, and the requirement for all strings to undergo the full Name Collision Risk Assessment reflect design choices that are grounded in Board-approved recommendations and the AGB.

The framework already incorporates the safeguards sought by commenters. Many of the recommendations made by commenters are already addressed within the existing documentation. Quantitative thresholds are defined for triggering further analysis; the High-Risk String Classification Model provides impact-based guiding principles with illustrative criteria; structured documentation requirements ensure consistency between evaluations; multiple layers of review (by external panels, TRT, Public Comment) guard against inconsistent outcomes; the TRT's discretion is bounded by the requirement to balance data collection against privacy and disruption risks; and redactions in Mitigation Plans require TRT agreement.

One area has been noted for further consideration. ICANN org has noted the feedback from the RySG and other commenters regarding the level of transparency provided to applicants and the community when a string remains in Temporary Delegation beyond the expected 90-day period. While the Temporary Delegation Operating Procedure already requires ICANN to provide a public status update in such cases (Step 3(b)), ICANN org will consider what additional information can appropriately be included in such updates, including if an explanation of the reasons for the extended assessment can be included, as part of the operationalization of this procedure.

Section 5: Next Steps

This section outlines the next steps by the requester in response to the Summary Report of the Open Proceeding.

1. ICANN org to publish the Name Collision Procedure Documentation Public Comments Report, and any supporting documentation (if applicable), by 15-April 2026 at the latest to keep the community apprised of the final outcome following the close of the Public Comments window.