

## **ISPCP Constituency comments on Name Collision Analysis Project (NCAP)**

The Internet Services Provider and Connectivity Provider Constituency (ISPCP) is pleased to provide the following comments to the Name Collision Analysis Project (NCAP) Study 2 Documents.

The ISPCP has filed numerous comments over the years on issues related to name collisions. As representatives of organizations who run the “help desks” of much of the Internet, ensuring that the DNS evolves in ways that lessen negative impacts for users is one of our primary roles for participating in the ICANN policy-making process. We have at times offered notes of caution into the process and called upon ICANN to ensure risk analyses and mitigation plans per TLD. We have long supported decisions to reserve delegation of “.home”, “.corp”, and “.mail” indefinitely.

For these policy processes, we value the role that SSAC plays within the ICANN ecosystem. The work they do is invaluable in guiding us toward making wise decisions. Indeed, in SSAC2021-02, “Revised Study 2 Proposal for the Name Collision Analysis Project”, they set what is clearly two important goals for NCAP Study 2:

1. Understand the root cause of most name collisions
2. Understand the impact of name collisions

We stand in alliance with both the SSAC and NCAP participants around attempting to achieve these important goals. The results of these studies will serve as guideposts for the ISPCP and others to guide us in the final stages of the new gTLD program.

For this reason, and putting aside any questions, comments, or concerns around NCAP Study 1, we encourage the NCAP team to take as collaborative approach as possible in seeking to definitively address the goals of NCAP Study 2. It is important to look beyond the Case Studies listed, and to learn from the experiences of those who operate the DNS root and related resolvers. OCTO and the ICANN contracted parties should be advised, as should the ISPs who represent the world’s largest and most trafficked DNS resolvers. Please do not hesitate to reach out to ensure that the important work you are doing will lead to the most credible, collaborative results.