

ICANN Public Comment on .internal

- [Link to Public Comment](#)
- [Link to SAC113: SSAC Advisory on Private-Use TLDs](#)

— BEGIN —

Google has reviewed the ICANN SSAC publication "[SAC113: SSAC Advisory on Private-Use TLDs](#)" which recommends that the ICANN Board ensure a string is identified and reserved at the top level of the Domain Name System (DNS) for private use, and that this particular string must never be delegated.

We agree with IANA's determination that ".INTERNAL" meets the criteria outlined in Section 4.1 of the document and supports the selection of this string.

In addition, Google is already using the string .internal (and has been for many years) in a manner similar to that described in SAC113, as part of our Google Cloud Platform offerings to businesses. Google Cloud needed a private-use TLD to remove external dependencies and prevent collisions with delegated TLDs similar to the motivations listed in Section 2.1 Use-Cases for Private-Use TLDs of SAC113. Due to the lack of an existing private-use name, Google adopted ".INTERNAL" in an ad-hoc fashion exactly as described in the SSAC advisory.

Furthermore, a significant number of Google Cloud customers have built these names into their enterprise applications, deployed at scale across multiple computing environments. We are also aware of many enterprises and infrastructure providers also using this string for this purpose. Therefore, the selection of ".INTERNAL" has the clear advantage of matching already deployed behavior.

We would also like to note that ".INTERNAL" is currently the highest ranked undelegated Top-Level Domain on the [ICANN DNS Magnitude statistics page](#), and so this string is already widely in use. If ".INTERNAL" were to be delegated, there would be widespread consequences to those myriad of users.

For these reasons, Google supports adoption of ".INTERNAL" to fulfill the needs and motivations described in SAC113: SSAC Advisory on Private-Use TLDs.

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Some other notes (esp for Crystal's RySG / BC comment):

- Having a TLD reserved for private use is useful to companies to avoid causing future name collisions.
- .INTERNAL is already in use for this in a number of Cloud providers, and (presumably) some set of BC people use Cloud.
- It is memorable and descriptive (accounting.internal is relatively clear – note: “descriptive” to English speakers 😊)
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