



November 29, 2006

The Board of Directors
Internet Corporation for Assigned Names and Numbers (ICANN)
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

Dear ICANN Board,

As a follow-up to the report submitted by Registry Services Technical Evaluation Panel (RSTEP) vis-à-vis Tralliance Corporation's proposal for a new wildcard registry service, we would like to request the ICANN board to allow us to launch a .travel wildcard for a limited period of time. If at any time, the proposed service affects the stability and integrity of the Internet, as determined by ICANN, we would withdraw the service forthwith.

We appreciate the work RSTEP has done by reviewing our proposal and engaging in a detailed question and answer session with us. Needless to say we are disappointed that despite the assertion that the *"proposed service with respect to the likelihood and materiality of effects on security and stability concludes that it does create a reasonable risk of a meaningful adverse effect on security and stability"* the report does not provide any empirical or technical evidence for that conclusion.

The RSTEP report concerns about whether a new TLD delivers a consistent user experience or if certain applications break with a DNS wildcard are ultimately business decisions on the part of the TLD operator. We are not sure how that affects the stability and integrity of Internet. Even today, if the local ISP has inserted a wildcard, the user experience would vary and so would different versions of spam filters. There seems to be no consistency in arguing that while it is fine at the periphery of the DNS, it is not fine at its center.

The Internet-at-large can and will survive experimentation in well-defined and small TLD's without endangering stability or undermining the confidence of end-users. Please note that when TLDs with more than three letters started operating there were – and still is – considerable variation in user experience, and certain applications such as emails do break even though no one has clamored that it is impacting the integrity and stability of Internet.

We would like to point out once again there are more than 12 ccTLDs that have wild cards installed in their root and some of them such as .nu have 50% more registered domain names than .travel. No one seems to have been bothered with what the likely effect of their registration base becoming bigger or with other large ccTLDs claiming reciprocal rights in this regard.

Many of the concerns that RSTEP has raised are valid - if in fact they happen with a wild card that is currently in use. However, none of the existing wildcards have shown that the concerns are valid. Therefore, the best way to examine these concerns is to test the .travel wildcard for a limited period of time. If the concerns are proved to be correct, then the proposed limited launch could be withdrawn immediately.



We would also like to bring to the attention of the board the recent posting by Cary Karp of MuseDoma, the sponsor of .museum, who has had a wildcard installed and running for the past several years without affecting the stability of the Internet. He observes with regard to the RSTEP report that, *"The fact that it has been resolving for five years without any observed interference with the stable operation of the Internet demonstrates that any potentially disruptive effect it may have is lost in the noise floor. It does not, however, provide a basis for extrapolating threshold values beyond which such a situation might be less benign. Much of the discussion has therefore been focused on distinctions between "tolerably small" and "riskily large" TLDs. This obviously resists expression in clear quantitative terms, and a variety of subjective factors have been weighed into the issue"*.

The operators of the .museum wildcard go on to say, *"In light of all this, and in acknowledgment of the general applicability of many of the concerns delineated in the RSTEP report, we intend to ask ICANN for permission to suspend the operation of the .museum wildcard for a period during which we can assess the target community's response to that change, and test aspects of the alternate facility that might be masked by the presence of a wildcard. Although there is no reason to expect this to result in anything that can be registered on the DNS "securitometer", it may nonetheless be worth monitoring simply to verify that the (dis)appearance of a wildcard in a small gTLD is without measurable effect on the stable operation of the Internet"*.

The issues raised in the RSTEP report related to how end-users and certain applications might be affected by the DNS wildcard are useful to be aware of. Experimentation within a new TLD would allow the technical community to monitor DNS Wildcard use and collect empirical data on the effects of wildcard use to the overall Internet network. The RSTEP itself acknowledges that *"because the proposed wildcard changes the expected behavior of the DNS in such a fundamental way, it is impossible to anticipate all of its side effects without testing each and every mail server and agent, every instant message application and agent, every VOIP server, proxy and user agent, every parental control system-basically every application of the Internet"*.

For the reasons noted above, we respectfully seek permission from ICANN to temporarily operate a .travel wildcard for a specific period of time so that we could also "assess the target community's response to that change". ICANN and the technical community can then monitor its performance and assess any impact on the security and stability of the Internet from an empirical and quantitative basis, rather than on subjective terms. We submit that this request, if granted, would indeed be a tremendous contribution to the Internet community as a whole.

Thank you for your consideration.

Sincerely,
Ronald N. Andruff
President