March 26, 2006

Dr. Stephen D. Crocker
Security & Stability Advisory Committee Liaison
ICANN

Subject: Impact of Automated Domain Registrations ("Domain Tasting") on .ORG Registrants

Dear Dr. Crocker:

In the past six months, PIR has seen a dramatic increase in the volume of domain name registration transactions in the .ORG registry, followed by a corresponding increase in deletion transactions during the 5 day grace period. Preliminary analysis indicates that such "program trading" in domain names is usually automated, and employs sophisticated algorithms to select, test and keep or reject names based on their monetary value ("Domain Tasting"). PIR is concerned about the potential impact of Domain Tasting on the stability and security of the Internet and is working on some initiatives to better manage issues that arise as a result of such activities. The economic incentives driving this activity are unlikely to change, however it is in the best interest of the Internet to ensure at least minimal fail safes are in place for the protection of the .ORG Registrant Community.

Our primary concerns center around the consequences of a relinquished/ expired domain, or a new but semantically / phonetically similar domain, purchased based on traffic and subsequently utilized in a contradictory scope of the organization's mission. The classic example is a Rape Counseling Center site [1] converted to a hyperlink haven [2] for sex toys and pornographic pages which aims to make money by selling subscriptions. This is one of many related scenarios requiring advocacy and affecting the .ORG Community.

The problem of domain name owners relinquishing names and the names subsequently being registered by other parties is not new. The new dimension and exacerbation of the problem is that companies now exist solely to register domain names dropped or expired (usually by uninformed .ORG registrants). Typical names that are picked up are those that are already indexed in major search engines such as Google or Yahoo, names that are often typed into search engines and therefore may generate revenue, or names that are directly associated with a well known organization. Each of these names has monetary value, frequently far in excess of the actual cost of the domain registration. As a result, domain names are automatically selected without regard for their actual use or meaning, but primarily for the economic value of the revenue generated by clicks on the site.

Registrants that allow their domain names to expire without understanding the value of the domain being relinquished run the risk of having their good name and primary online identity completely sullied. The Registrants are most often left with no legal or other recourse. In fact, some Registrars have changed their agreements with Registrants to permit the capture of Registrant domain names for their own account when not renewed.

PIR believes that proactive measures should be considered and implemented to protect the public interest. For example, we believe that registrants should be informed at registration time and again at domain renewal/deletion regarding the consequences and options regarding deleted names in this new domain name economic paradigm. .

In addition, PIR is in the process of developing an international public awareness initiative to protect and educate the .ORG community on expired domain name exploitation. We will work with ISOC and other stakeholders during the development process to ensure the maximization of resources and results. In addition, we are soliciting ICANN's support as we initiate the global campaign to improve the awareness among Internet Registrants. We also see a possible course of action for SSAC to study the problem, and issue observations and recommendations regarding best practices to be followed, and/or changes in the domain name registration regime as a result of such practices. It is imperative, and in the public interest for all domain name registrants in general and .ORG registrants specifically, to understand the intrinsic value of their domain name prior to relinquishing the name.

We ask SSAC to initiate a study of the impact on the security and stability of the domain name system as relates to the automated pickup of dropped domain names by registrants who are unaware of the intrinsic value of the domain(s) they relinquish, for the primary purpose of monetary gain.

Thank you for your consideration and support.

Sincerely,

Edward G. Viltz
President & CEO
Public Interest Registry

cc: ICANN Board of Directors
    Paul Twomey
    Ram Mohan

[1] crisiscentersyr.org after re-registration by new entity
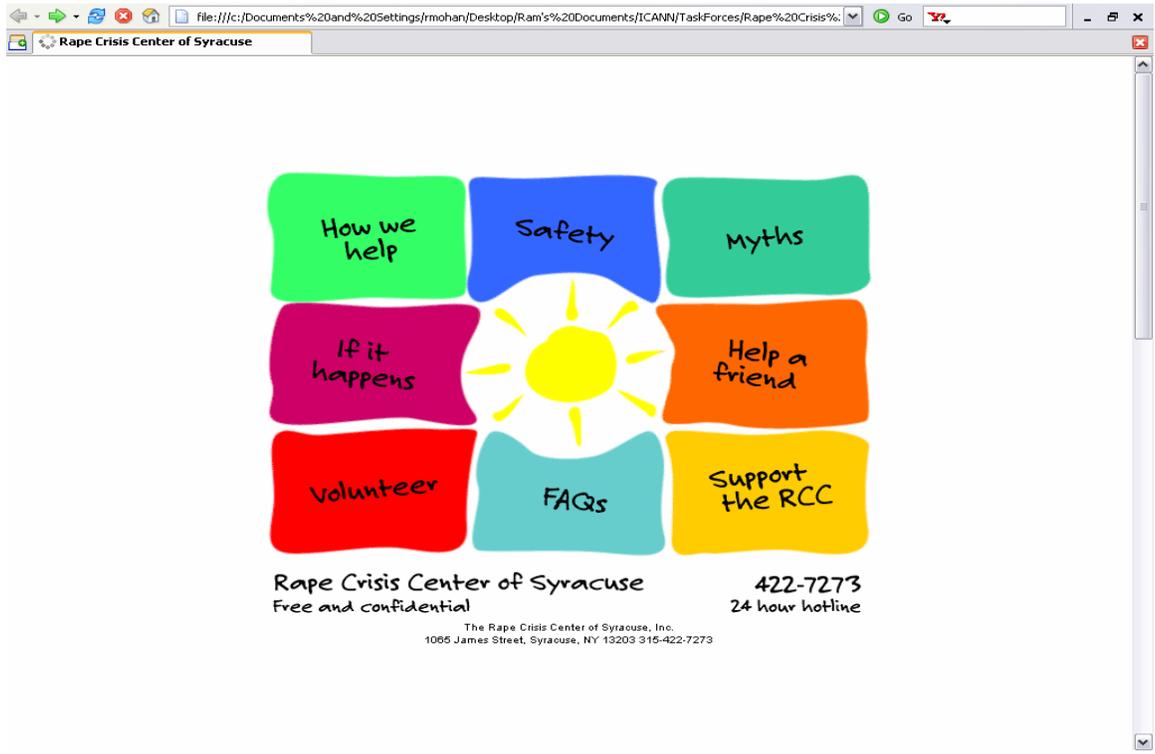
[2] Conversion to pornographic linked site
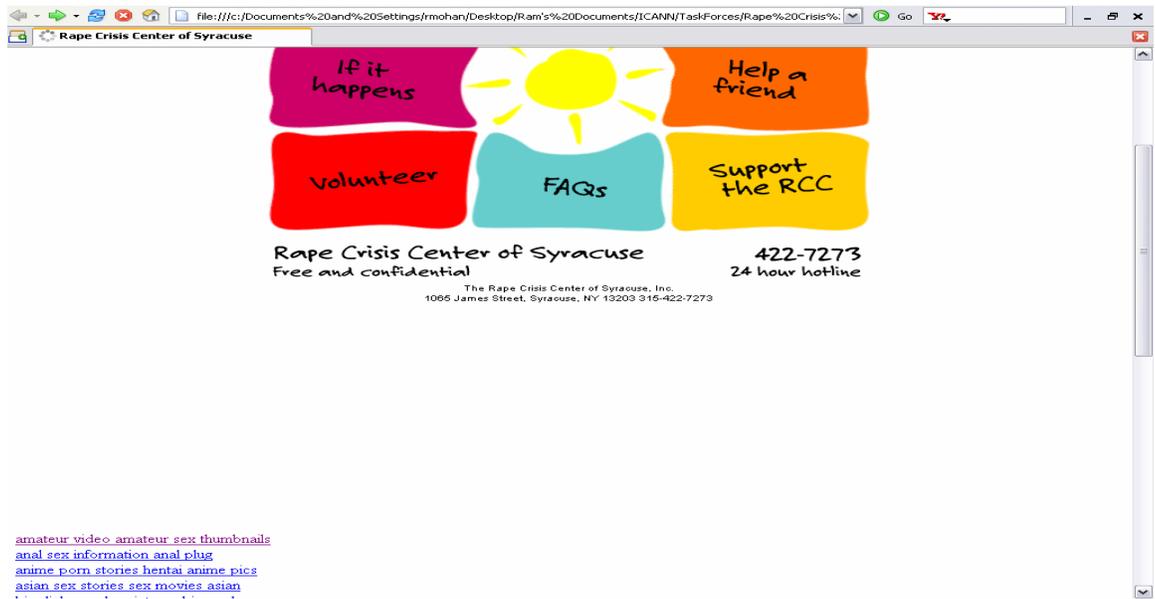
[2] Excerpts from (new) Whois Registration record for crisiscentersyr.org

Domain Name: CRISISCENTERSYR.ORG
Created On: 26-Dec-2005 18:58:18 UTC
Last Updated On: 02-Mar-2006 21:33:17 UTC
Expiration Date: 26-Dec-2006 18:58:18 UTC
Name Server: NS1.HOT-SWEETIES.COM
Name Server: NS2.HOT-SWEETIES.COM