



**ICANN WORKSHOP: SHORT-TERM SOLUTIONS FOR REGISTRAR
CONTENTION OVER DOMAIN NAMES AT REGISTRY RELEASE**

December 1, 2004

Cape Town, South Africa

Contact:

Ray King

ray@snapnames.com

Mason Cole

masonc@snapnames.com

Susan Crawford

scrawford@scrawford.net

Introduction and thanks

SnapNames thanks ICANN, VeriSign and the Registrars Constituency for arranging this discussion.

As we understand it, Rusty Lewis's email to registrars about thread-related issues has prompted this workshop. Our comments here are provided within that context -- a search for near-term, temporary solutions to the thread problem.

SnapNames has already contributed to this discussion and signed on to Paul Stahura's letter of October 25, 2004, advocating the ratio method (see App. A attached).

We welcome the opportunity to contribute to this discussion of short-term, temporary solutions.

Keys to near-term resolution of contention problem

SnapNames believes the primary issue at hand is mass accreditation of "shell" registrars (that is, accreditations granted to one operator for the purpose of increasing batch pool transaction capacity). These accreditations have created an obviously abusive, improper and unsustainable situation.

Here are two ways to solve the contention issue created by these sham accreditations:

1. Ensure compliance with the RRA contracts

To the extent that abuses of the SRS by shell registrars are prohibited by various provisions of the RRA, the terms of that contract should be reasonably enforced by the registry and/or ICANN. As noted in Rusty Lewis' letter to registrars, dated September 17, 2004:

The RRA contains important restrictions, prohibitions and limitations on Registrars' access and use the Shared Registration System, Registry-Registrar Protocol and other VeriSign intellectual property rights which preclude the kind of activity [outlined above].

2. Implement the "Ratio Method"

The ratio method of batch pool capacity allocation, as described in Appendix A, fits with the spirit of equivalent access and represents a rational, adequate, near-term solution to abusive contention.

The ratio method has the considered support of registrars that, through healthy competition and marketplace success, now sponsor a significant majority of currently-registered domain names. SnapNames renews its support of the ratio method and urges its immediate adoption by VeriSign.

Long-term solution

As noted in our e-mail of November 10: WLS, as a sought-after registry-level service by the end-users we all serve, and as a long-term solution for the threads issue, has been reviewed and approved three times by the ICANN Board. The time has long since passed for ICANN staff to follow the Board's directions and forward WLS to the Department of Commerce for signoff.

We at SnapNames understand that this workshop is about the short-term need to attenuate the registry's transaction load. And this workshop is, appropriately, considering issues that are entirely separate from WLS. (Of course, WLS will reduce registrar contention.) However, should ICANN participants have ideas or thoughts about post-introduction features for WLS, SnapNames (as system designer and owner of the intellectual property surrounding the monitoring and re-registration of domain names) is glad to participate in any discussion that is productively oriented toward commercial viability and end-user benefit.

The abuses occurring today illustrate the need for a registry-level approach so that consumer needs are effectively met. The WLS trial will help determine whether consumer interest demonstrated to date is validated.

Appendix A: Ratio Method Definition

A registrar may perform at most N Failed Transactions per day, where N is X times the average number of Successful Transactions of that registrar, which average is calculated over the previous 30 days.

"X" being approximately 300

"Failed Transaction" or "Dip" being any of

- 1) Any check command
- 2) A failed add command

"Successful Transaction" being any paid transaction that has left its respective grace-period and shall include:

- 1) explicit add transaction that has left its 5-day grace period
- 2) transfer transaction
- 3) auto-renewal transaction that has left the 45-day grace period
- 4) explicit-renewal transaction that has left its 5-day grace period
- 5) restore transaction

The number of Successful and Failed Transactions will be based on all transactions, and will include transactions performed in the batch pool and in the guaranteed pools. Also, a two-year registration, for example, will count as two transactions.

Any registrar in violation of this policy will have its privileges in the batch pool removed for a period of time not less than seven days on its first offense. For additional offenses, the time period will be increased. Any registrar that attempts to "burn out", by pounding the registry with many Failed Transactions (say more than twice its allocated limit) during the course of one day, even though it has performed little or no Successful Transactions for the preceding 30 days will have its batch pool access privileges removed as soon as the abuse is discovered and shall remain banned for not less than 30 days.

Today, names drop (become re-available) at approximately Y names per minute, so that the length of time during which the drop lasts is approximately 1 hour for Z names. The approximate rate at which names drop will remain as it is today. And the list of names will continue to be made available in advance, except the order in which they are released will be unknown.

The maximum number of dips per unit of time (the maximum dip rate) which any registrar will be allowed will be capped at approximately the number of dips that a registrar could perform when registrars had 10-15 connections to the batch pool.

The registrar is responsible for keeping track of their dip usage. The registry should provide per-registrar reports, available via ftp and updated daily, to make this task easier.

The policies in all the other pools besides the batch pool will remain the same.