

**28 August 2002**

Dear ICANN Evaluation Committee,

**Comments on .org Preliminary Evaluation Report from Unity Registry**

Having read through the Preliminary Report to ICANN Board, Unity Registry would like to address some issues which we feel warrant a re-evaluation of the Gartner and Academic CIO technical components. In Section I below we list comparisons that appear not to have been dealt with in the Gartner Report or may have been incorrectly given credit because due diligence is yet to be completed. Section II below refers to specific quotations from the Gartner report which we believe require reconsideration. Given the limited time frame, comparisons were only performed predominately in relation to the leading ISOC bid.

No detail of the decision making process for the Academic CIO brief evaluation was provided by ICANN. Given the disparity between the Academic and Gartner evaluations, we would therefore respectfully request that the detailed report, including decision making process, be provided or the evaluation disregarded.

The Unity Registry partners were of course very pleased to receive the highest rating from the Non-Commercial Constituency for the non-technical aspects of our bid. As was noted by the evaluation team, the broad range of organizational support we achieved for our bid was based on our credibility as service providers, our first rate plans for differentiation of .org and accountability to the user community.

**I COMPARISON**

All quotes in this section, unless otherwise mentioned, are from the ISOC tender response.

**1) Section 1: Stable, well functioning .org registry**

**a) SLAs**

**Unity** has the highest or equal highest financially guaranteed performance criteria (relative to the top 3 proposals) in 19 of 21 criteria. (Refer Appendix I). Specifically the **ISOC** SLAs allow the .org DNS to be out for 1 day per year (99.73%). Whilst **ISOC** do claim 100% network uptime, their SLAs only financially guarantee 99.73%. **ISOC** also do not limit planned outages only unplanned outages. **Unity** limits DNS down time to 6 minutes per year and unplanned outages to 8 hours per month and 18 per quarter for extended outages.

**b) Database**

**ISOC** do not mention which Relational Database Management System (RDBMS) they intend to use. This is a crucial component of any Registry and stores all the data. The **ISOC** bid indicates using the current Afiliis database infrastructure. This is a non-

commercial, free database that has limited scalability and redundancy capabilities. **Unity** has defined its RDBMS as a commercial, proven and globally supported ORACLE database. This has native support for all key technical elements of the registry system.

**c) Manual Failover**

**ISOC** propose that “In the event that the primary registry’s main database fails, the registry application can be manually switched over to the secondary database.” By using ORACLE, **Unity** can seamlessly failover to a backup database without interruption to service or manual intervention.

**d) Existing systems**

**ISOC** state “**Afilias**’ existing systems are already enough to run the .org TLD (with capacity to spare).” Recent tests performed on existing **Afilias** live systems indicate that their systems do not meet proposed SLAs on 3 of 4 tests conducted. These tests were performed with only the **Afilias**’ current data, without any additional load that would be expected with the addition of .org. It should be noted that the above refers to 1 of the 2 criteria of the 21 SLAs where **ISOC** received a higher grading than **Unity**. (For results refer Appendix II)

**e) Size versus Scalability and Competition**

The current evaluation appears to demonstrate a close correlation between size of current database and result. The criteria as understood from the tender, is about ability to scale rather than current registry size, as otherwise there is no way to increase competition with registry industry. This is especially relevant given the items referring to increasing competition were separated and placed in the “Usage” evaluation. Current size does not equate to scalability. **ISOC**’s current database has limited scalability. **Unity**’s database can scale. The current AusRegistry system has already been tested for up to 1.5 million names and 4.5 million contacts.

**f) Delayed Zone File Updates**

**ISOC** intend to provide Five minute update on zone files”. **Unity** registry provides for instant update of zone files.

**2) Section 7: Type, Quality and Cost of the Registry Services Proposed**

**a) Incomplete Billing System**

**ISOC**’s technical provider **Afilias**, who has been operating for almost a year, “will move towards a full billing system”. **Unity** already has a full billing system.

**b) No Technical Plan for Equal Access**

**ISOC** and **Unity** have both put in place procedures and policies to protect equal access and treat all registrars equally. However, **ISOC** neglect to consider the inappropriate actions of current registrars whose business practices involve “spamming” registration requests for expiring popular domain names. **ISOC** provide no method for ensuring equal access in these currently existing circumstances. **Unity** has considered this and provides multiple technical solutions to ensure Equal Access for all registrars.

### c) Price

**ISOC** has a higher price (US\$6) than **Unity** (US\$5), and offer no reductions based on reaching economies of scale.

## 3) Section 9: Transition Considerations

### a) Credibility

**ISOC** claim “**Afilias**, though its relationship with **AusRegistry** Pty. Ltd. **will be** conducting the conversion of 250,000 .au domain names from a conventional system to the most current version of the EPP Protocol. This transition will occur around July 1 of this year. The transition process involves multiple data sources from different organizations under the supervision of **Afilias** and the Australian Domain Authority (auDA). This transition is one of the first attempted in the community in live production system.”

**Afilias** did not and could never have reasonably assumed they would be conducting the transition process nor did they supervise it. The **Afilias** involvement was contracted and limited to evaluation, testing and auditing of systems, standards and loads prior to the actual transition. Any evaluations of the **Unity** and **ISOC** submissions in both the Gartner and CIO Reports, which included this in their consideration, should be reevaluated.

**AusRegistry** as part of **Unity Registry** has the experience in transitioning a registry that is far more complex than any other applicant. A letter from auDA has been provided to verify this. This transition was done to an EPP version 6 compliant system and data model and involves strict policy requirements requiring EPP protocol extensions. This transition performed by **AusRegistry** involved several different sources and formats of data requiring strong transition experience and systems.

### b) Complex Nature of AusRegistry .au registries

**Afilias** (bidding partner of **ISOC**) run an EPP version 2 compliant system with no policy requirements. **AusRegistry** (bidding partner of **Unity**) run an EPP version 6 compliant registry and data model. The **AusRegistry** Registry includes much more complex protocol extensions as a result of the strict policy requirement placed on **AusRegistry** by auDA. This also indicates ability to adopt protocol changes (Evaluation Criteria 8).

### c) Incomplete Plan

**ISOC** have stated that they have a realistic Transition Plan. Questions over how realistic this is are difficult to assess with any credibility without a GANTT chart. **ISOC** refer to Verisign as a contingency, yet do not have or mention any commercial relationship between themselves and Verisign. Without this, the transition plan is incomplete. **Unity** has provided this transition plan in full including GANTT chart as requested in the tender. **Unity** also clearly defines the active commercial nature and limitations of their relationship with Verisign.

#### d) Limited support for Registrars in transition

**ISOC** refer to “The registry contemplates a transition path that will have minimal impact on registrars and be transparent to the end user community.” As part of part of the **ISOC** transition plan the registrars are required to transition their own data into the new thick registry. **Unity** has opted to do this for the registrars to minimize impact. Given this **Unity** has provided a realistic timeline for the complete transition of all registrars from a thin to a thick registry.

## II GARTNER EVALUATION

This section refers to questions over comments made in the Gartner evaluation. All quotes in this section, unless otherwise mentioned, are from this evaluation. Subsequent comments describe the issue.

### 1) Section 1: Stable, well functioning .org registry

#### a. ISOC

- “Managed the transition of the gTLD (.info) to EPP”.

**Afilias** did not transition .info to EPP as it was a new gTLD, which ran EPP from conception.

- “Willing to commit to a 100% availability”.

Whilst they mention a 100% network uptime, they only commit to at best 99.75% uptime in the Service Level Agreement. (Refer Appendix I).

#### b. Unity

- “Initially a thin deployment will upgrade to EPP following successful transition from .org to Verisign”.

As Verisign is currently not EPP compliant, all registries will be required to do this and as such the comment is redundant.

### 2) Section 7: Type, Quality and Cost of the Registry Services Proposed

#### a. ISOC

- “The proposal details guaranteed performance levels for **all** components of services to be provided, along with a description of the proposed **variable** SLAs and the associated registrar credit system.”

**Unity, Neustar** and **GNR** all guarantee performance levels on more components of the services provided than **ISOC**. Whilst **ISOC** does mention some performance criteria throughout their tender, they did not guarantee them.

**b. Unity**

- “Performance level guarantees are detailed with minimum performance commitments that meet specified requirement.”

**Unity** has the highest or equal highest financially guaranteed performance criteria (relative to the top 3 proposals) in 19 of 21 criteria. Despite this, **ISOC** is referred to as “The applicant commits to meeting or exceeding all stated performance requirements.”

**3) Section 8: Ability and Commitment to support, function in, and adapt protocol changes in a shared registry system.**

**a. ISOC**

- “and provides a very good high-level migration plan focused on customer support.”

**ISOC** according to their tender expects the individual registrars to perform the RRP to EPP migration themselves. Unity has proposed to do this for them.

- “Experience (referring to transition) in doing similar transactions since 1999.”

This experience only refers to DNS migration which is not the same as transition of legacy registry data.

**b. Unity**

- No justification is provided for the low rating.

**4) Section 9: Transition Considerations**

**a. ISOC**

- “appears to be based on prior experience.”

We note, It may “appear” that way, but it is not so. (Refer first Section I Part 3a)

**III CONCLUSION**

Given the issues outlined in this letter, Unity Registry believes it would be prudent for Gartner to perform a re-evaluation taking into account the above information. We also request any additional detail in the Academic CIO evaluation be revealed so it can also undergo public comment. This is particularly relevant given the disparity in between their evaluation and the Gartner evaluation. If the Academic CIO is unable to provide this

detail then we believe that the Academic CIO evaluation should be disregarded and a new evaluation team appointed in its place.

Should you require any further information or clarification on any of these matters, please do not hesitate to contact us.

Regards,

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**APPENDIX I:**

Service	SLA	Unity Registry Response	ISOC Response	Neustar Response	GNR response
DNS	Availability	99.999%	99.73% (Resolution) 98.61% (Updates)	99.999%	99.999%
	Performance Level	3 x daily average no of queries from most loaded name server.	Not stated	Not Stated	3 x daily average no of queries from most loaded name server
	Response Time	95% < 1.5s	Not stated	95% < 1.5s	Not Stated
	Planned Outages	None Allowed	90mins /month	None Allowed	None Allowed
	Outage Timeframe	None Allowed	Not Stated	None Allowed	None Allowed
	Update Frequency	95% < 15mins	Not Stated	95% < 15mins	Not Stated
Registry Services (EPP/RRP)	Availability	99.9%	99.75% (not transfer) 99.45% (transfer)	99.9%	99.4%
	Performance Level	400 tx/s (RRP) 200 tx/s (EPP)	Not Stated	Not Stated	40 tx/s
	Response Times	97% < 4s	< 800ms Transform < 400ms Check < 1600ms Transfers	95% < 1.5s Query 95% < 3s Add	Not Stated
	Planned Outages	8 hours/month (normal) 18 hours/ ¼ year (extended)	Not Stated	8 hours/month (normal) 18 hours / ¼ year (extended)	8 hours/month (normal) 12 hours / month (extended)
	Outage Timeframe	0600 – 1400 UTC Sun	Not Stated	0600 – 1400 UTC Sat or Sun	0600-1500 GMT Sat or Sun
Whois Service	Availability	99.95%	99.45%	99.95%	99.4%
	Performance Level	400 tx/s	Not Stated	Not Stated	200 tx/s
	Response Time	97% < 1.5s	< 800ms	95% < 1.5s	Not Stated
	Planned Outages	8 hours/month (normal) 18 hours/ ¼	Not Stated	8 hours/month (normal) 18 hours/ ¼	8 hours/month (normal)

Service	SLA	Unity Registry Response	ISOC Response	Neustar Response	GNR response
		year (extended)		year (extended)	12 hours / month (extended)
	<i>Outage Timeframe</i>	0600 – 1400 UTC Sun	Not Stated	0600 – 1400 UTC Sat or Sun	0600-1500 GMT Sat or Sun
	<i>Update Frequency</i>	95% < 15mins	Not Stated	95% < 15mins	Not stated
<i>Registry Web Interface</i>	<i>Availability</i>	99.9%	Not Stated	Not Stated	Not Stated
	<i>Performance Level</i>	Not Stated	Not Stated	Not Stated	Not Stated
	<i>Response Time</i>	97% < 4s	Not Stated	Not Stated	Not Stated
	<i>Planned Outages</i>	8 hours/month (normal) 18 hours/ ¼ year (extended)	Not Stated	Not Stated	Not Stated
	<i>Outage Timeframe</i>	0600 – 1400 UTC Sun	Not Stated	Not Stated	Not Stated

*\*Please Note: Although Planned Outage is defined in the ISOC tender, it is never referenced to apply to any service*

All shaded in Green are “best of breed” SLAs.

## **APPENDIX II:**

Test conducted on Afilias Live Registry Systems between 26th – 27th by RegistrarsAsia (an ICANN and Afilias accredited registrar and parent company of AusRegistry Pty Ltd)

Ping Time at time of test: 237ms

Avg recorded check time:	679ms – latency	=	442ms
Avg recorded create time:	1148ms – latency	=	911ms
Avg recorded info time:	880ms – latency	=	643ms
Avg recorded delete time:	942ms – latency	=	705ms

All times in red are above the stated SLA.

The complete data collected during this test is available upon request.

**APPENDIX III:**

AUDA SUPPORTING LETTER TO BE ATTACHED