Public Comment Summary Report

Proposed Top-Level Domain String for Private Use

Open for Submissions Date:
Wednesday, 24 January 2024

Closed for Submissions Date:
Thursday, 21 March 2024

Summary Report Due Date:
Tuesday, 16 April 2024 (Extended from Friday, 05 April 2024)

Category: Policy

Requester: ICANN org

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Open Proceeding Link: https://www.icann.org/en/public-comment/proceeding/proposed-top-level-domain-string-for-private-use-24-01-2024

Outcome:
ICANN received a total of 32 public comments from across the community on the Proposed Top-Level Domain String for Private Use. Thirteen of these were in support of the proposal. Of the remaining nineteen comments, six believed a shorter string should be selected, one believed a more meaningful string should be selected, and the remaining comments were not in scope.

Staff have assessed that there have been no responses that would cause them to view the analysis as erroneous or to require re-assessment or a different conclusion. Therefore the proposed selection (.INTERNAL), along with the outcome of the public comment proceeding, will be presented to the ICANN Board for further consideration.

Section 1: What We Received Input On

IANA performed an evaluation to determine a suitable string to be reserved for the purpose of a top-level domain that may be used for internal or private use applications. The string "INTERNAL" was identified as appropriate for this purpose.

This public comment proceeding provided the opportunity for commentary on whether the string properly meets the SAC113 selection criteria, or is encumbered in some other unanticipated way.

A previous public comment on the [Proposed Procedure for Selecting a Top-Level Domain String for Private Use](#) was held resulting in the limited scope for this public comment. Thus, other questions were out of scope for this proceeding. This includes proposals for additional strings to reserve, or proposals to reserve alternative strings besides "INTERNAL".

Section 2: Submissions

Organizations and Groups

Name	Submitted by	Reference
ICANN At-Large Advisory Committee	ALAC Staff	ALAC
Amazon	Gregory DiBiase	Amazon
Google	Vinton Cerf	Google
I Love Domains - United States o' America	Davies Lewis	ILDUSA
ICANN Business Constituency	Business Constituency	BC
The IO Foundation	Jean F. Queralt	IO
ICANN Registries Stakeholder Group	Registries Stakeholder Group	RySG
ICANN Security and Stability Advisory Committee	SSAC Staff	SSAC

Individuals

Name	Affiliation	Reference
Adams, John		Adams
Alexander, Robert		Alexander
Brooks, Aaron		Brooks
Eckert, Toerless	Futurewei Technologies	Eckert
Eggebroten, Tim		Eggebroten
Frakes, Jothan	Public Suffix List (PSL)	Frakes
Glanville, Alex		Glanville
Hart, Matthew		Hart

Humpert, Ben		Humpert
Humphreys, George		Humphreys
Kang, Seonghoon		Kang
Kumari, Warren		Kumari
Lehman, Luke		Lehman
Marks, Paul		Marks
Martinez, Federico		Martinez
Moravec, Pavel		Moravec
Ni, Rui		Ni
Northover, Tim		Northover
Otte, Denis		Otte
Pirrone, Arnaldo		Pirrone
R, B		R
Simpson, Colin		Simpson
Smith, Laura		Smith
Stas, Thibault		Stas

Section 3: Summary of Submissions

ICANN received a total of 34 submissions to this Public Comment proceeding, with two of these submissions subsequently withdrawn by the submitter. The remaining 32 responses can be summarized as follows:

- Support for the proposal (13 respondents: ALAC, Amazon, Frakes, Google, Hart, Humphreys, BC, Kumari, Otte, Pirrone, RySG, Simpson, SSAC)
- Shorter string should be selected (6 respondents: Humpert, Marks, Martinez, Moravec, Ni, Northover)
- String is not meaningful (1 respondent: Kang)
- Partially or fully out of scope responses
  - Additional strings should be selected (Adams, Brooks, Eggebroten, Lehman, Marks, Otte, Simpson, Smith)
  - Designate .LOCAL (Glanville, R, Stas)
  - Designate sub-domains under selected string for specific purposes (Alexander, Frakes)
  - String should only be finalized after IETF process (Eckert)

○ Other (ILDUSA, IO)

Section 4: Analysis of Submissions

The following is a summation of the submissions that were deemed responsive to the scope of the consultation, along with our evaluation or response to the submission.

Theme	Evaluation/Response
Support for the proposal	Noted
Shorter string should be selected	The string was selected balancing a number of factors, not just length. The selected string was deemed to be the superior choice across all the factors.
String is not meaningful	Respondent viewed the analysis as insufficient to demonstrate the meaningfulness of the string, and concluded the assessment may need to be performed again. The string was deemed to be meaningful by the team of assessors across a range of language contexts. Based on this comment, staff could not identify a way to perform the analysis differently that would address the stated concern. We note the scope of this proceeding is specifically to identify whether the provisionally selected string met the SAC113 criteria, not on whether other strings that were not selected may have also qualified.

Responses deemed out of scope

Staff notes that there were a number of submissions that provided commentary beyond the scope of the consultation. In order for a submission to be in scope for this public comment proceeding the submission either had to agree with the proposal, or dissent with the proposal and state why .INTERNAL did not abide by any of the four criteria described in SAC113. For transparency purposes, summaries of the common themes are shown below.

Theme	Evaluation/Response
Additional strings should be selected	The mandate for the selection was limited to identifying a single string only.
Designate .LOCAL	The .LOCAL domain was designed for

	Multicast DNS in 2013 by RFC 6762. While typically used in internal networks of a similar scope to this proposed string, it is to support a specific Internet standard, rather than for a general purpose.
Designate sub-domains under selected string for specific purposes	Such proposals contradict the intent of this top-level domain to be set aside for private-use as network operators see fit.
String should only be finalized after IETF process	The outcome of this work will only seek to reserve the domain for this purpose and against delegation for another purpose (e.g. as a new gTLD). The outcome is the result of a multi-year effort which included IETF leadership on identifying the appropriate course of action, and is respectful of the roles and responsibilities between the two organizations described in RFC 2860. It does not preclude any further work on identifying best practices on how any private use TLD could be used.

Section 5: Next Steps

Staff have assessed that there have been no responses that would cause them to view the analysis as erroneous or to require re-assessment or a different conclusion. Therefore, the proposed selection, along with the outcome of the public comment proceeding, will be presented to the ICANN Board for further consideration.