



The Swiss Education & Research Network
Limmatquai 138
CH-8001 Zürich, Switzerland

Comment on the ICANN evaluation process for ORG registry reassignment

1. Technical aspects

1.1 Our objectives

Our objectives had been to write an honest and reasonable proposal, describing an efficient, stable, reliable and cost-effective registry, based on fifteen years of experience. The technical part of the proposal was written by engineers for engineers.

1.2 The evaluation

Generally, the evaluation process can best be described as 'beauty contest'. The proposals with the brightest and shiniest promises were highly ranked. The evaluation has just been comparative, comparing the proposals. We are missing the relationship to the 'real world'. This is probably due to the fact that the experts are not involved in daily TLD registry management. This led to the situation where the proposals looking most impressive got the best rankings and proposals based on stability, efficiency, cost-effectiveness got inferior ratings.

The technical part has been evaluated by two teams: Gartner Inc. and an academic CIO team. We can only comment to the first because the latter did not provide detailed information to comment upon.

We also note a strong unbalance with regard to the evaluation team-members origin: this evaluation process was an All-American play.

No comment on the obvious personal interconnection between ICANN, ISOC and Afilias but it would be unwise to believe that this situation contributed positively to a neutral evaluation process.

Financial stability and the fact that a non-commercial bidder could better suit the non-commercial community seem to have been non-issues: we could not find any reference to these facts and no such criteria were applied.

It is our opinion that our bid was considered as stemming from an "outsider" with no real experience and therefore was treated as negligible (*quantité négligeable*).

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1.3 Comment on specific items mentioned by the evaluation team

Crit.	Gartner issue	Our comment
1	Proprietary pre EPP-type of protocol	At the time of introduction of our XML based e-mail interface for registrars (January 2000) there was no EPP protocol and RRP still in draft form. SWITCH was far advanced at that time. EPP will be a viable successor albeit introduced three years after our very similar in-house development.
	Sized equipment at the lower end	Our registry design was intentionally kept as simple and compact as possible to reduce cost, increase stability and keep maintenance low.
	Will deploy thin WHOIS service	The main objective was to provide a smooth transition. SWITCH currently runs a thick WHOIS for CH and LI and such a service could also be offered to ORG registrars.
	No detail provided on SLA's	All third parties we would contract for ORG were clearly identified and all have committed to contribute. With the exception of Nominum none of the contributing parties were of crucial importance (SWITCH runs the registry) and Nominum has provided detailed specifications. WRT services for registrars we provide bulk-updates, lists, key account support etc. for CH and LI registrars and such services and many more were mentioned in the bid.
	Real-time registration service	The evaluation team ranked 'real-time' and 5 minutes update times high. Our bid defines 2 hours as the time for an update to be reflected on the master and secondary name servers and explains in detail why this is reasonable. Updates in WHOIS are of course immediate.
7	Final price to be determined based on uncertainties in the fees collected by ICANN	Wrong assessment. Proposed fee is USD 5 with the community to decide if it should be lowered at the expense of less community services or not. The balance is between community services and price. Since SWITCH is a non-profit entity all profits would be reflected in either price or services.
	No details on registrar services	Our community concept provides such details (para. 3, Differentiation of ORG Top Level Domain name). Our proposal is very similar to RA and Dot.ORG, the experts just didn't notice it.
8	Little detail provided for the methodology proposed to promote equivalent business practice	Statement unclear to us. We have ensured a technically non-discriminatory access and offer geographically distributed support offices with front- and back-offices for registrar services and a joint outreach and marketing committee (see Community Concept).
	No timetable	The transition plan has a time table.
	Unclear roll-out	Clear emphasis was laid on uninterrupted registry and name server functions. To the registry services we count helpdesk functions for registrars. All other functions were considered as second priority with regard to the transition and to be established by a cooperative effort (see Community Concept).
9	Does not communicate understanding of major TLD transition	This is a weak point in our proposal and we regard the critic as valid. The transition plan should have provided more detailed information and there were no milestones for ICANN to evaluate the process in our proposal.

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	No understanding of contingency	We could have described a successful transition carried out in November 1999 with approx. 200'000 domain names from a flat WHOIS data base (RIPE WHOIS) to a relational one and to a new registration system at the same time.
11	Completeness lacks detail	SWITCH demonstrates 'live' experience both for non-profit management of registry and as registrar. Technical concept is in our view detailed but does reiterate basic knowledge.
	Applicant refers to content of ICANN documentation	What is the purpose to restate already published information?
	Does not indicate current operational experience	SWITCH has 15 years of experience in running a TLD registry. This is mentioned in our 'About SWITCH' section. Due to the experts reluctance to seriously consider the proposal this experience was obviously not noticed by the experts.
	Poorly laid out and inadequately completed proposal	The proposal was written by engineers for engineers. We are convinced that our proposal can easily be understood by people familiar with the design of a TLD registry. It considers many operational details but we have to admit that it lacks the promotional language the experts might have expected.

2. Usage aspects

2.1 Our objectives

The SWITCH objectives with regard to community services had been to provide a stable, neutral, credible and independent registry, offering innovative services based on a cooperative approach (involving registrants and registrars) with the aim of building-up a strong 'ORG' identity. It has never been our intention to dictate the allocation of surplus funds. The proposal displays structures the registry would implement to facilitate a cooperative process to which all non-commercial holders of domain names and the registrars would be invited and could contribute. SWITCH does not believe in a 'good causes' model where funds are allocated by uncertain or even undefined criteria.

2.2 The evaluation

We consider the NCDNHC evaluation process as more neutral and more objective than the technical process but it also was dominated by US interests although the member list looks like it had more diversity. The self-nominated members of the evaluation team were strongly influenced by the personalities of the two US members.

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2.3 Comment on specific items mentioned by the evaluation team

Crit.	NCDNHC issue	Our comment
4	Differentiation: no market research	SWITCH had no access to bulk ORG WHOIS data. We could only make statistical analyses on location of registrants and registrars and begin to classify the registrants in categories. SWITCH did propose an identity or brand for ORG (the report attests that SWITCH proposes innovative services “that would help to differentiate the domain”). The community concept is focused on ‘soft’ differentiation: to create an ORG culture by appropriate means (Community Gateway) and by smart actions (Cooperative Marketing Committee). SWITCH proposes methods to ensure a non-discriminatory relationship among and with registrars (Registrar’s Platform).
5	Responsiveness and governance: little participation in public forum	The persons asking questions in the public forum were unknown to us and we were not addressed directly. Furthermore the questions raised were either answered in Bucharest or in the bid. The Registrar’s Platform is intended as a communication channel to the registrars, the Community Gateway is an active (not passive) tool for SWITCH to get in touch with the non-commercial community.
6	Little public support	Debatable criteria applied by NCDNHC team to qualify external support. In many cases the supporters were either involved in the bid or were offered financial compensation to support the bidders. We consider the first as unnecessarily increasing cost and the latter on the verge of corruptness. Both types decrease independence and neutrality of the registry and its credibility. The support we have received from CORE was not mentioned by the review team (Registry Concept, para. 12).

3. Procedural aspects

ICANN itself evaluated the bidder’s qualification for the endowment. In our case ICANN relies on an assumption and a speculation. We consider both as non-founded.

4. Summary

In our view the ORG evaluation process could have been a showcase for ICANN to demonstrate openness, fairness and global thinking. ICANN, however, chose to honor the closest bidder in an American-dominated process we consider as highly nontransparent (evaluation by academic team not communicated, weighting of criteria unknown, important criteria not considered etc.). This ICANN managed ORG evaluation process was in our view not as fair as it could have been.

Readers may refer to <http://www.switch2.org> for an unaltered documentation (exactly as submitted to ICANN).