



**VeriSign, Inc.**  
487 East Middlefield Road  
Mountain View, CA 94043

**Via FedEx and Facsimile**

October 3, 2003

John Jeffrey, General Counsel  
Internet Corporation for Assigned Names and Numbers  
4676 Admiralty Way #330  
Marina del Rey, CA 90292

**Re: VeriSign Wildcard Implementation**

Dear Mr. Jeffrey:

I am writing in response to the report submitted to the ICANN Board of Directors by ICANN's Security and Stability Advisory Committee ("SESAC") entitled, *Recommendations Regarding VeriSign's Introduction of Wild Card Response to Uninstantiated Domains within COM and NET* ("SESAC Report"), dated September 22, 2003 and to express concerns regarding the upcoming SECSAC meeting scheduled for October 7, 2003 on this subject.

On September 15, 2003, VeriSign implemented a wildcard initiative, which is fully standards-compliant as that term is defined in the applicable specifications. As part of this initiative, VeriSign launched its Site Finder service; a service already offered by 11 other TLD registries at the time of launch. Prior to implementing the service, VeriSign completed extensive research and testing. Our findings indicated that Internet users worldwide receive more than 20 million cumulative error messages a day during navigation with mistyped domain names or domain names that for technical purposes do not resolve on the Internet. With the launch of Site Finder, rather than receiving an error message with no useful information, users now receive a helpful web page with a clear message that what was entered could not be found and, offering helpful links to possible destinations and allowing an Internet search.

The service has been well received by millions of Internet users who appreciate receiving navigation tools as opposed to the 'dead end' of an error message. Indeed, growing numbers of Internet users are utilizing the navigation tools available through the service.

In reviewing the SECSAC Report, the SECSAC recommended suspension of the service based on what the Report claimed to be the "apparent" impact of the service. The SECSAC Report, and the recommendation, did not provide any data or facts on which to

base the recommendation. We understand that the October 7, 2003, SECSAC meeting in Washington DC will be an attempt by SECSAC to gather data to support the conclusions and recommendations already issued in its report. Unfortunately, and despite our requests, we were not given the opportunity to provide any input or supply any information to the SECSAC prior to the issuance of the report.

We had hoped to have a meaningful opportunity to describe the Site Finder service at the October 7 meeting as well as to provide information, to explain the services functioning and implementation, and to debunk some of the misconceptions currently being forwarded. We were informed yesterday by SECSAC Chair, Steve Crocker, that VeriSign will only be permitted to make a thirty-minute presentation. Respectfully, given the issues to be addressed and the structure of the meeting, this limited time will not be sufficient.

As with the issuance of the initial report, we are concerned regarding the organization of the meeting, the conclusions that appear already embedded in the agenda, the lack of structure around how the meeting will be conducted, and the lack of any terms of reference for the meeting. Further, we learned yesterday that the meeting will consist of a series of speakers, each of whom has already come out publicly against the service, followed by an unstructured open microphone session. We do not believe that this format is appropriate to objectively gather and substantiate the data upon which the SECSAC seeks to base the conclusions in its report. Further, given the speakers that SECSAC has selected, we have grave concerns that the meeting can be objective, constructive, or fair.

Prior to the meeting, please provide us with the committee's documented processes and procedures for conducting the type of meeting proposed for October 7, and any related proceedings. We have been unable to locate such documentation. We believe that these procedures at a minimum, should form the basis for the conduct of the meeting.

Furthermore, we believe that the meeting and any related proceedings should be conducted in accordance with the committee's charter and that the scope of the meeting will be limited to matters within the committee's charter. If this is not correct, please let us know.

In addition, we request that the meeting and any related proceedings be conducted in a manner consistent with ICANN's Bylaws. In this regard, at a minimum we would request that, in an effort to obtain broad and informed participation, the committee:

- 1) disseminate an objective description of the service and related technology beforehand;
- 2) disseminate the results of any investigations undertaken by the committee to date, including a description of the committee's investigative methodology, techniques, and sources of information; and
- 3) disclose the applicable standards for wildcard, and the

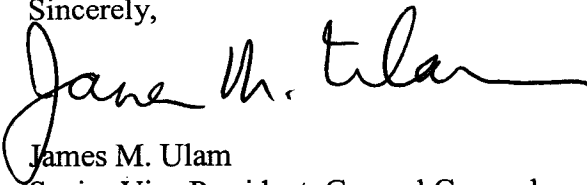
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conclusions in the IAB report that the VeriSign wildcard is compliant with those standards.

Finally, given our discussion today, the circumstances surrounding the SECSAC report, and the limits on VeriSign's participation, I am concerned that certain basic steps to ensure an objective, open, transparent, and constructive meeting have not been taken. At a minimum, to plan and conduct a meeting such as this neutrally, objectively, and with integrity and fairness, the following conditions should have been present: 1) refraining from making public statements concerning VeriSign's wildcard initiative before the meeting; 2) discouraging the exertion of any influence on participants before the meeting; 3) encouraging open-mindedness and refraining from orchestrating the content presented at the meeting; 4) requiring committee members or any participants in the meeting to disclose their commercial affiliations prior to making any contributions during the meeting; 5) documenting the committee's process for establishing the meeting agenda, conducting the meeting, and considering any related matter; 6) ensuring that issues that are outside the proper scope of the meeting or the committee's charter are not considered; 7) establishing terms of reference for the meeting; 8) providing VeriSign an opportunity to respond to statements or data presented during the meeting; 9) requiring contributors to submit to the committee documents or other substantiation supporting the statements made during the meeting; and 10) requiring ICANN's manager of public participation and a representative of ICANN's Office of Ombudsman to be present to assist in ensuring fairness and no irregularities during the meeting. Given actions over the course of the last several weeks, it is apparent that certain of these conditions cannot now be met. We would hope that every effort will be made to conduct the meeting in a manner that can at least meet some of them.

I trust the committee will consider these issues before continuing down the course it has chosen for this meeting. However, we remain troubled by the manner in which the SECSAC issued its original report and the manner in which the October 7 meeting has been organized, the agenda formed, and VeriSign's participation limited.

Sincerely,



James M. Ulam  
Senior Vice President, General Counsel  
VeriSign, Inc.

cc: Paul Twomey, President and CEO, ICANN  
Steve Crocker, SECSAC