February 6 2017

To: Mayor Bill deBlasio,
Cc: Letitia James, Gale Brewer, Melissa Mark-Viverito, James Vacca, Sree Srinivasan, Miguel Gamiño, Jeff Merritt, info@ownit.nyc

Dear Sirs & Madams,

On March 31 2012 New York City signed a 5 year contract with Neustar Inc, to manage the .nyc Top Level Domain (TLD).[1] The domain was delegated by ICANN on March 20, 2014 [2], and went into operation on May 5 2014 [3]. According to tldstats, as of February 6, 2016, 72,919 domains are registered.[4]

The Internet Society's New York Chapter (ISOC-NY) is a New York State registered non-profit founded in 1997 with the mission "to assure the beneficial, open evolution of the global Internet, and to promote local initiatives, maximize the societal benefits which the Internet can bring to the New York area." As such we have taken a keen interest in .nyc as a public resource. This has included promoting, recording, webcasting, (and, on occasion, hosting) any and all public events where the development of the .nyc TLD has been discussed.

Noting that the Neustar contract is imminently due for renewal, on January 31, 2017, the ISOC-NY Board of Directors passed the following resolution:

"The Internet Society's New York Chapter urges the city of New York to provide robust outreach and engagement opportunities for the city's Internet stakeholder community prior to renewing the contract that will guide the operation of the .nyc TLD registry for the next 5 years."

I therefore ask that, before the contract be renewed.
* The City institute a public comment process.
* The City convene a town hall event where all stakeholders may make their views known.
* That the City review those comments and views and, as it sees fit, make appropriate adjustments.

Sincerely,

Joly MacFie,
President, Internet Society New York Chapter
218 565 9365   president@isoc-ny.org

[1] http://www1.nyc.gov/assets/forward/documents/dotnyc/Neustar-TLD-Signed%20Agreement_Redacted.pdf
[2] https://www.iana.org/reports/c.2.9.2.d/20140314-nyc
[3] https://newgtlds.icann.org/en/program-status/sunrise-claims-periods/nyc
[4] https://ntldstats.com/tld/nyc

Appendix 1 - Observations & Nitpicks

* Since a December 2015 high of 87,960 the number of registrations has been in
  steady decline - down approximately 16% [4]
* 60% of registered domains are parked. [4]
* According to connecting.nyc many auctioned premium names are non-functional/up
  for resale. [5]
* Neustar Inc.itself is being sold [6]
* The Community Advisory Board set up by the City [7] never had public meetings
  or published minutes, and appears to have been summarily disbanded.
* The FAQ on the ownit.nyc website appears not to have been updated since
  the launch.[8]
* Also the ownit.nyc site does not include a list of reserved names (link is RGP list). [9]
* However, in 2015, the Mayor's Office did make a proper info page. [10]
* The contract says: "Neustar shall publish the website in English and the top six
  non-English languages spoken by City residents, as set forth by Executive Order
  120 (dated July 22, 2008) ("E.O. 120"). This is only done using google translate,
  thus not checked for accuracy.
* After outreach "community webinars" were held in just 2 of the 5 boroughs. The
  rollout of 'neighborhood names' seems stalled.[11]
* The neighborhoods.nyc template only includes modules from the City's vendor
  with no open API or process to include 3rd parties e.g. BetaNYC.
* Clause 6(g) of the contract calls on Neustar to conduct 50 nexus spot checks/week.
  There is no documentation that this has been done.
* The nexus requirement, while desirable, may inhibit personal use of .nyc because of
   privacy concerns, as all info is available via whois. The City might want to
  instigate a proxy mechanism for individuals.
* ownit.nyc is not available via IPv6. And also the IPv6 nameserver appears to
  give a different result to the IPv4 nameservers. If so, this is not kosher.

[4] https://ntldstats.com/tld/nyc
[5] http://bit.ly/2kiAozP
[6] http://bit.ly/2kAci22
[7] http://bit.ly/2kA9mma
[8] http://www.ownit.nyc/faq
[9] http://www.ownit.nyc/restricted-reserved
[10] http://www1.nyc.gov/site/forward/initiatives/dotnyc/dotnycdocs.page
[11] https://youtu.be/yH0clLwPEfo