O.7 Data Escrow and Backup

NeuStar will back up the databases in our data centers in Virginia and Illinois and will regularly place escrow copies of the backups in secure off-site locations. These procedures are essential elements of our realistic plans for continuity of operations in the event of system failures and natural or man-made disasters.

The goal of any data backup/recovery procedure is full recovery from failures without any loss of data. Data backup strategies handle system hardware failures (e.g., loss of a processor or one or more disk drives) by reinstalling the data from daily backups, supplemented by the information on the “before” and “after” image-journal backup files that the database creates.

The conventional strategy for guarding against loss of the entire facility because of fire, flood, or other natural or man-made disaster is to provide off-site escrow of the usTLD data in a secure storage facility. Even when successful, this recovery strategy does not prevent the loss of a certain volume of transactions between the time the data were backed up and the occurrence of the disaster. Users are subject to denial of service during the time required to recover the data center database and/or reestablish operations at an alternate disaster recovery site. Relocating the data center normally requires at least 24 hours, and the escrowing of backups often is done only weekly, meaning that a disaster could result in substantial loss of both services and data.

NeuStar’s backup solution goes a step further. We propose two co-active Enhanced SRS data centers, each capable of handling the entire workload should a major system failure or natural or man-made disaster occur at the other. The transactions from each data center are replicated in real time to the other over redundant high-speed Virtual Private Network (VPN) telecommunications links. Each Enhanced SRS data center also conducts independent backups, as described in the following paragraph. Since the two Enhanced SRS data centers are co-active, our backup strategy maintains continuity of operations and enables full recovery of all transactions, even in the event of multiple hardware failures.

O.7.1 Frequency and Procedures for Backup of Data

Each co-active data center independently implements a zero-downtime/zero-impact incremental data backup each day and a full data backup weekly. We place escrow copies of the backup tapes in a secure off-site storage facility operated by a third party whose business is data escrow. We copy static data (e.g., the operating systems, DNS software, and applications software) to CD-ROMs for quick reload, should that become necessary. We back up DLT tape any dynamically changing files (e.g., log files vital to system maintenance and operation, database files, database-journal files, and software configurations). Weekly, we perform full-system backups to DLT tape of all databases identified in Section O.3 (Enhanced SRS Database, Whois, Billing).

Each data center uses online zero-downtime/zero-impact backup procedures that include the following four steps:

1. The database is put into backup mode to guarantee a consistent version of the data on the snapshot copy that is written to a RAID disk array for subsequent (slower speed) copying to tape. While the database is in backup mode, the XRP, Whois, and Billing applications continue to function and to access the data. The database normally is in backup mode for only about 5 to 10 minutes.

2. The backup software writes the data to the RAID disk array.

3. The backup software, which is located on a backup server independent from the application servers, creates the backup DLT Tape copy from the snapshot copy on the RAID disk array.

4. When the backup is finished, the DLT Tapes are transported to the secure escrow facility.
O.7.2 Backup Hardware and Software Systems

Exhibit O-12 depicts the backup/recovery hardware and software of the Enhanced SRS data centers. Each data center’s system includes two backup servers with DLT robotic tape libraries. The data backup system uses the DLT IV data cartridge and the DLT 5 data format. To achieve zero-downtime/zero-impact backup, we use a RAID disk array and a high-speed fiber channel bridge interconnect to the robotic tape libraries. The backup server copies not only the database server’s backup files to the disk array, as discussed in the four-step process already described, but also the backup files of the cluster servers. During the few minutes this process requires, applications still have access to the cluster servers and database server. Then the backup server copies the files to the DLT robotic tape device.

Because of the criticality of the database, NeuStar proposes a fully redundant database management system. We will configure the database system as two independent database servers—primary and backup—with synchronous replication using two-way commits to maintain database synchronization. If one database server fails, the database system is sized so that the second server can process the entire load without degradation while the primary server is restored to service.

We will transport both daily incremental backups of dynamically changing data and the weekly full backup to a secure escrow agent to be selected with the concurrence of the COTR.

Exhibit O-12. Snapshots of NeuStar’s Centralized usTLD Database are written to a disk array and then copied to tape library to enable seamless application processing and continuous database access.

O.7.3 Procedures for Retrieval of Data and Rebuild of the Database

We maintain copies of the DLT tapes holding incremental data backups in a three-tape rotation:

- One DLT backup tape is in transit to the secure escrow facility.
- A second DLT tape is in storage in the secure escrow facility.
- The third DLT tape is in the data center for reuse.

The full backup tapes are maintained in a two-tape rotation, with one tape at the secure escrow facility and one at the data center for reuse. Copies of the static data CD-ROMs for the operating systems and applications are also maintained at the escrow facility.
Should the primary database server experience a catastrophic crash that necessitates a lengthy recovery process, data center operations continue seamlessly on the backup database server that replicates all the data in the primary server. After the failed database server is repaired, we recover its data using the full backup tape and incremental backup tape that is retrieved from the escrow facility. We first restore the full backup files, and then we restore the incremental files. We then synchronize the recovered database to the primary database. This procedure recovers the database to the last complete transaction processed by the primary database.

This backup procedure enables NeuStar to meet the service level agreements required for continuous availability and near-zero unplanned downtime, thereby improving the stability of the Internet, enhancing public confidence, and improving customer satisfaction.

## O.8 Whois Databases for Both Registrars and Delegated Managers

NeuStar proposes a central, authoritative Whois service that will provide the Internet community with consistent, timely, and accurate information about Registrants and delegated Managers.

Whois is a database of information about Internet domain names. NeuStar’s proposed registry will maintain a state-of-the-art, near real-time Whois service that will make this information available to registrars and delegees on the common Whois port (Port 43) as well as through a NeuStar public website. With a simple wrapper around NeuStar’s Whois service, these registrars and delegees will have the ability to control their own Whois offering, complete with its own look and feel and branding. Our registry will store all information relating to Whois data entities, including contact and authentication data. This section covers both the Whois Database (Registrants) and the Delegee Whois database. The term Whois implies both services.

The Whois service is intended as a directory service for registrants, as well as for any other individuals and businesses that want to query details of domain names or related data stored in the registry. Our Whois data will be available in both conventional and machine-readable format, facilitating automation.

In addition to providing the Whois directory service to registrars and delegees, NeuStar will also have the ability to provide the service directly to the Internet community via our Web site.
**Benefits of Proposed Solution**

NeuStar’s proposed solution, which centralizes the Whois data and provides its own access, as well as access via registrars and delegees, provides the following benefits:

- Central location for all authoritative usTLD registration data,
- Standard protocol accessible over port 43 for registrars and delegees,
- Consistent format (fields and formatting) for all users,
- Machine-readable format (promotes automation),
- Near real-time update, and

**0.8.1 Whois Service Functional Description**

The Whois service will accommodate queries regarding the data entities listed in the following table.

<table>
<thead>
<tr>
<th>Whois Data Entities</th>
<th>Entities</th>
<th>Fields</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Domain names</td>
<td>Attributes (Status)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated nameservers</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated registrar Associated Delegated Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated registrant data</td>
</tr>
<tr>
<td></td>
<td>Nameserver</td>
<td>Attributes (Status)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated IP addresses</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated registrar Associated Delegated Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated Delegated Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated registrant data</td>
</tr>
<tr>
<td></td>
<td>IP Address</td>
<td>Attributes (Status)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated nameserver</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated registrar</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated Delegated Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Associated registrant data</td>
</tr>
<tr>
<td></td>
<td>Registrar List</td>
<td>Registrar name</td>
</tr>
<tr>
<td></td>
<td>Registrars</td>
<td>Registrar name</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Registrar contact details</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Registrar URL (Home page)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Registrar Whois URL (Web Port 80)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Registrar Whois URL (Web Port 43, if applicable)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Attributes (Status)</td>
</tr>
</tbody>
</table>
Machine-Readable Format

*NuStar's standardized Whois format will facilitate automated parsing of Whois information.*

Because the viewable data could be modified over time (e.g., new fields could be added), a robust and formalized encoding mechanism is needed to provide the non-Registrar/Delegee community with reliable automated access to Whois data.

For example, an organization tracking trademark infringement might want to acquire the Whois data, automatically parse it, and store it in a tracking system. To accommodate such organizations, the Whois information must be presented in a formal, way that is compatible with automated processing. To accomplish this, we will present the Whois data in a readable format.

Advanced Search Capabilities

Per COTR requirements, the Whois database will support using multiple string and field searching. Boolean searches based on any combination of Whois fields will be accommodated.

Data Filtering

In order to accommodate any data access restrictions that may arise, either immediately or in the future, NuStar will implement the capability to filter viewed data based either on the capabilities/profile of the requestor or the query type. This will allow NuStar to conform to any data privacy requirements imposed on the Whois data.

Bulk-Access Program

NuStar proposes to provide a data mart that will give users the ability to download the Whois database, while limiting the recipient’s conditions of use.

The proposed data mart bulk-access program would:

- Reduce the load that data mining could impose on the core Whois service,
- Contractually limit subscribers in the ways they can use the data,
- Provide the entire database in a format that facilitates data mining, such as conducting trademark searches, compiling industry statistics, and providing directory services.

Both the registry and the registrars/delegates will have the ability to conduct the actual bulk-access program. Data will be exposed only within the privacy restrictions imposed by the usTLD Administrator, or by law.

Each full and incremental data set will consist of an XML document meeting the content and format requirements, as agreed by the Registry and the accessing customers. Once the XML document is generated, the following preparation steps will be performed:

- The XML document will be placed in a file named to reflect the date and whether the file consists of incremental data or full data.
- The Registry Operator may optionally split the document using the Unix SPLIT command (or equivalent) to produce files no less than 1 GB each (except the final file). If files are split, an MD5 file (produced with MD5SUM or equivalent) will be included with the resulting files to isolate errors in case of transfer fault. The Registry Operator may optionally compress the document using the Unix GZIP command (or equivalent) to reduce the file size.
- The file(s) will then be encrypted and signed using PGP version 6.5.1 or above, with a key of DH/DSS type and 2048-/1024-byte length. The Data Recipient’s public key will be used for the encryption and the Registry Operator’s private key will be used for the signature. Public
keys will be exchanged between the Registry Operator and the Designated Recipient by e-mail, physical delivery of floppy diskettes, or other agreed means.

Once prepared, data sets will be provided either by Internet File Transfer Protocol (FTP) or, at the option of either the Registry Operator or the Designated Recipient, by writing the full data set to DAT tape (or other media mutually agreed by Registry Operator and the Designated Recipient) and sending it to the Designated Recipient by expedited delivery service (such as FedEx or DHL).

**O.8.2 Whois System Architecture**

NeuStar will deliver a Whois service that incorporates near-real-time update, scalable infrastructure, and multiple layers of redundancy. We will initially deploy the Whois servers at the two co-active Enhanced SRS data centers shown previously in Exhibit O-1. The software architecture will enable us to deploy Whois infrastructure to any number of additional NeuStar data centers. As the registry grows, we will have the ability to deploy additional Whois infrastructure as appropriate to increase geographic dispersion, enhance the level of service in particular geographic regions, and reduce the load on the Enhanced SRS data centers.

Exhibit O-13 illustrates the Whois architecture. At each Whois site, incoming queries are distributed by a load balancer to a cluster of Whois servers that are, in turn, connected to a backend database cluster. This configuration will provide both redundancy and scalability through the addition of servers to either cluster.

Each Whois server will cache common requests in memory and query the back-end database cluster only on a cache miss. We can configure the duration that Whois information is cached before being deleted (e.g., 10 minutes); after deletion, the server must query the database for the information. Each Whois server will be configured with at least 2 GB of high-speed memory, sufficient to hold at least one million of the most commonly queried Whois records.

Exhibit O-14 depicts the update of the Whois databases. As the Central usTLD database is updated, the system will also update the Whois distribution database server in near real time. This database will be replicated to the Whois databases. Replication between data centers always occurs over a VPN or a dedicated link, and the registry will digitally sign update packages.

The proposed Whois service offers the following benefits:

- Service can be scaled by adding servers to each Whois cluster,
- Databases can be scaled by adding machines to each database cluster,
- Service can be scaled by deploying Whois infrastructure to additional data centers,
- Inherent redundancy ensures high availability,
- Update process ensures near-real-time availability of the latest information, and
- Caching of common queries provides superb response time.
Exhibit O-13. As with other Enhanced SRS configurations, NeuStar will provide fault tolerance and easy scalability of the Whois system through redundant architecture and clustered servers.
Exhibit O-14. The Centralized .usTLD Database updates the Whois and Delegee Whois distribution databases in near real-time, and the information is distributed within a configurable period to the Whois/Delegee database, where it is available for query.
O.8.3 Network Speed and Proposed Service Levels

The potentially large volume of Whois queries places a significant network connectivity burden on the registry. Based on the assumption that each Whois query will generate approximately 10 Kbits of network traffic, we will use the following engineering guidelines for provisioning bandwidth:

- Initially, we will provide 10 Mbits per data center. The total of 20 Mbits will support approximately 2,000 queries per second (approximately 172 million requests per day).
- As the volume of registrations grows, we will extend the service at a rate of 10 Mbits per one million domain name registration records under our management. For example, when the registry manages 5 million domain names, we will dedicate 50 Mbits of Whois bandwidth, which will support nearly 450 million Whois queries per day.

These guidelines will be compared with actual usage data and adjusted accordingly.

We will engineer the Whois service to provide the following average service levels:

- 150 million queries per day (90% cache hits and 10% cache misses, which must be forwarded to a database file). We will increase this query service demand, based on the total number of domain name registrations managed by the registry, as previously discussed.
- 200-millisecond latency for cache hits (after the request reaches the data center).
- 500-millisecond latency for cache misses (after the request reaches data center).

We will configure the Whois service to limit connections based on the following criteria:

- 1,000 queries per minute from any single IP address,
- 20,000 queries per minute for requests originating from designated registrar/delegee subnets, and
- An “acceptable use” policy that we will negotiate with COTR and the registrar/delegee community.

We will scale the exact number of Whois and database servers deployed in each cluster and at each data center to maintain the specified service levels.

O.9 System Security

NeuStar is currently operating successful data centers for various telecommunications and domain name registry services. This experience has familiarized us with security risks, as well as with the most current and effective means of thwarting such risks. The COTR can be assured that our comprehensive security provisions will protect the usTLD infrastructure, operations, and data.

Enhanced Shared Registration System (Enhanced SRS) and nameserver data centers are subject to a wide range of security threats, including hacking, break-ins, data tampering, denial of service, and physical attacks against the facility. The recent denial-of-service attacks against important government and dot-com sites point to the technical capabilities of some hackers and the lengths to which they will go to attack the Internet community. Further, because the Registry will contain proprietary data from competing registrars, security procedures must incorporate user authentication procedures that ensure that each registrar’s files are available only to its own personnel.

Failure to address these security threats creates the risks of unscheduled down time and the disruption or denial of services.

This section describes system security features that we will implement in our networks, servers, and applications for the Enhanced SRS data centers and nameserver data centers.
O.9.1 System Security

NeuStar offers the COTR comprehensive system security for our networks, servers, applications, and customer support services. Our security architecture is a policy-based, multi-tiered structure based on industry standards and on evolving new IETF standards for registry-to-registrar security and secure DNS. Our solution integrates the following security features to provide assurance that multiple security threats or attacks will be unsuccessful:

• Perimeter protection for Whois and DNS applications;
• Controlled access at the server operating systems;
• Applications-level security features for XRP, Billing & Collection, and customer service applications;
• Connection security;
• Data security;
• Intrusion detection;
• User identification and authentication;
• Continuity of operations; and
• Physical security.

O.9.1.1 Enhanced Shared Registration System Data Center Security

The Enhanced SRS provides three layers of security to protect the registry subsystems: (1) network security, (2) server security, and (3) application security. Each security layer addresses a specific security threat as discussed below.

Network Security

Edge routers, firewalls, and load balancers provide perimeter protection for the data center network and applications systems, guarding against unauthorized access from the Internet.

• Edge Router — The first security layer is the edge routers, which employ IP-packet filtering.
• Firewall — The second layer of perimeter security is a firewall that provides policy-based IP filtering to protect against system hacks, break-ins, and denial-of-service attacks. The firewall also includes network-based intrusion detection to protect against Internet hackers.
• Load Balancer — The third layer of protection is provided by load balancers within each data center. Load balancing protects our application servers from common denial-of-service attacks (e.g., SYN floods, ping floods, and “smurfs” attacks). Security policies can be based on any combination of source address, destination address, and protocol type or content.
• Virtual Private Network (VPN) — The registry network will use VPN technology to perform database updates at the nameservers, network-based backup/restore, remote system/network management, and system administration. Our goal is to operate the nameserver data centers sites in a “lights out” (unmanned) mode. VPN technology achieves secure data transfer through encrypted data communications links.

Server Security

The Enhanced SRS operating systems provide access protection through a user login procedure and through file-level access control lists. These access control mechanisms perform the following functions:

• User account security, which establishes the access capabilities of a specific authenticated user. After authenticating a user, each application’s security data tables control access to
information. Access is based not only on user ID but also on the type of application being used (e.g., XRP or Billing and Collection). The application server uses user ID to provide precise control of access privileges to—and uses of (read, write, and execute)—all system resources: screens, menus, transactions, data fields, database tables, files, records, print facilities, tape facilities, software tools, and software executables.

- Group-level security, which establishes the access capabilities of all users within a specific group. All users belong to one or more access control groups. Access control is identical to that for individual users.

- System Administration-level security, which restricts access to system administration tools, including the ability to change resource access privileges. Enhanced SRS system administration staff use dedicated links on an internal LAN/WAN to access administrative functions that are off limits to others. There is no external access to this LAN. All sessions require user identification by user name and password; access control lists determine what resources a user or user group is allowed to access and use.

The Enhanced SRS operating systems will perform security-relevant logging functions, including:

- **User Login**—Whenever a user login is attempted, whether successful or not, the event is logged. The logged information includes the user ID, time, and device requested.

- **User Accounting**—Logs every process executed by every user. The output includes date and time, user ID, point of entry, process, resources accessed, and result of the operations. This log may be selectively viewed for actions performed by a specific user or users.

- **System Logging**—This inherent, configurable logging capability permits monitoring the kernel, user processes, mail system, and authorization system. In addition, the operating system detects when file access privileges have been changed and also audits the use of telnet, finger, rsh, exec, talk, and similar operations.

The following provisions apply to passwords:

- Passwords must be at least six alphanumeric characters in length. At least one character must be alphabetic and at least one must be a numeric or punctuation character.

- If users forget their password, the system administrator verifies the user’s identity and then provides them with a temporary password that enables them to log on only to the site where users create their own new passwords.

- Passwords are valid only for a preestablished duration (typically 90 days, but reconfigurable). Prior to password expiration, the system instructs the user to create a new password.

- When a user changes his/her password, the system first reauthenticates the existing password and then requires the user to verify the new password before accepting the change. The system will not accept as a user’s new password either of that user’s two most recent passwords.

- Passwords are encrypted and stored in an inaccessible system file.

**Application Security**

Each Enhanced SRS application will have its own set of security processes and technical controls. The Enhanced SRS applications that interface with the registrars/delegates/registrants (e.g., the XRP and the secure Web customer service portal) employ the SSL (secure sockets layer) protocol element that uses public-key exchange and RC4 encryption. Public services (e.g., Whois, delegate, DNS queries, and the public Internet Web portal) rely on the previously
discussed network perimeter security devices—edge routers, firewalls, and load balancers—to protect the internal LAN and applications servers.

- **XRP Applications Security**—NeuStar’s XRP server authenticates against a series of security controls before granting service, as follows:
  1. The registrar/delegee’s host initiates an SSL session with the XRP server.
  2. The XRP server receives the registrar/delegee’s private key with the incoming message and authenticates it against their public key, which is stored in the registry’s XRP server.
  3. After the XRP server verifies the key exchange, it completes the SSL initialization to establish a secure, encrypted channel between itself and the registrar/delegee’s host computer. This secure, encrypted channel ensures the integrity of the session with registry applications.
  4. In combination with completing the SSL connection, the XRP server authenticates an X.509 digital certificate to verify the registrar/delegee’s identity. Digital certificates are maintained in the Enhanced SRS authentication server database.
  5. The registrar/delegee logs on to the XRP server using a user ID and password that determine access privileges. We will provide each registrar with multiple user IDs and password pairs, so that each can establish its own group of authorized users.

- **Whois/Delegee Whois Application Security**—Although any Internet user has read-only access to the Whois server, NeuStar’s perimeter security mechanisms—edge routers, firewalls, and load balancers—will protect it against denial-of-service attacks. A designated registry administrator performs common database administration tasks on the Whois and Delegee Whois databases, including monitoring their performance.

- **Nameserver Security**—Just as they have with the Whois servers, all Internet users have read-only access to the nameservers. Similarly, the edge router, firewall, and load balancers protect the nameservers as they do the Whois servers.

- **Secure Web Customer Service Portal**—The secure Web customer service portal uses the same security mechanisms employed by the XRP server: SSL session encryption, digital certificates, and user ID and password between the Enhanced SRS secure Web server and the registrars’ Web browsers. In addition, e-mail messages are encrypted with a Pretty Good Privacy (PGP) public-key infrastructure implementation. Digital certificates are maintained in the authentication server.

The following table summarizes the benefits of each security mechanism that we employ at the data centers to prevent system hacking, break-ins, and denial-of-service attacks.

<table>
<thead>
<tr>
<th>Security Summary</th>
<th>Features and Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Security System Element</strong></td>
<td><strong>Features and Benefits</strong></td>
</tr>
<tr>
<td><strong>Server Operating System Security</strong></td>
<td>Ensures that the user can access authorized functions, but no others, and can perform only authorized operations within these functions.</td>
</tr>
<tr>
<td>User ID and password; file-level access control lists</td>
<td>Limits database access to preauthorized users with a familiar, easy-to-use method for user authentication. Retains the last two passwords and disallows their usage, complicating the task of password guessing and cracking.</td>
</tr>
</tbody>
</table>
Security Summary

<table>
<thead>
<tr>
<th>Security System Element</th>
<th>Features and Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Rejects simultaneous sessions by an individual user, helping ensure that user IDs and passwords are not shared.</td>
</tr>
<tr>
<td></td>
<td>Limits access rights to database objects and functions to a specified user or user group, simplifying the job of user administration.</td>
</tr>
<tr>
<td></td>
<td>Rejects unauthorized access attempts and automatically disables identification codes after a preestablished number of unsuccessful attempts, preventing trial-and-error hacking attempts.</td>
</tr>
</tbody>
</table>

Application Security

- **Data encryption (SSL)**
  - HTTPS encryption ensures that only the intended receiver can read messages between users and the NDR.

- **Digital signatures**
  - Issued by an authentication server, digital signatures ensure that the incoming data actually have come from the purported sender. This provides nonrepudiation, avoiding disputes over data origin.

- **User ID and password**
  - Ensures that the user can access authorized functions, but no others, and can perform only authorized operations within these functions.

Network Security

- **Router**
  - Permits only UDP/TCP packets to enter the application servers, thus isolating the system from most potentially damaging messages.

- **Firewall**
  - Guards the secure LAN from the nonsecure Internet by permitting the passage of only packet flows whose origins and destinations comply with preestablished rules.

- **Intrusion detection**
  - Detects intrusion at the LAN level. Displays an alert at the network operations center workstation and creates a log entry.

- **Load balancer**
  - Implements security policies to prevent denial of service attacks (e.g., SYN floods, ping floods, and “smurfs”).

O.9.1.2 Nameserver Data Center Security

NeuStar’s approach to nameserver security is a subset of the security mechanisms we employ at the Enhanced SRS data centers. The nameserver data center also relies on multi-layer perimeter protection, controlled access, enforcement of applications security features, and strong physical security protection.

Network Security

The same mechanisms used for the Enhanced SRS data center are employed at the zone nameserver data centers. Edge routers and firewalls provide perimeter protection for the data center network and applications systems, guarding against unauthorized access from the Internet.

- **Edge Router**—The first security layer is the edge routers, which employ IP-packet filtering to allow only DNS UDP/TCP packets to pass into and out of the perimeter network.

- **Firewall**—The second layer of perimeter security is a firewall that provides policy-based IP filtering to protect against system hacks, break-ins, and denial-of-service attacks. The firewall also includes network-based intrusion detection to protect against Internet hackers.

- **Load Balancer**—The third layer of protection is server load which protects our application servers from common denial-of-service attacks (e.g., SYN floods, ping floods, and “smurfs” attacks). Security policies can be based on any combination of source address, destination address, and protocol type or content.
• **Virtual Private Network (VPN)**—The registry network will use VPN technology to perform database updates at the zone nameservers, network-based backup/restore, remote system/network management, and system administration. Our goal is to operate the zone nameserver data center sites in a “lights out” (unmanned) mode. VPN technology achieves secure data transfer through encrypted data communications links.

**Server Security**

The zone nameserver operating systems provide access protection for remote system administration through a user login procedure and through file-level access control lists. These access control mechanisms perform the following functions:

• User account security establishes the access capabilities of a specific system administration authenticated user. After authenticating the user, the operating system’s access control lists control access to information.

• System Administrator-level security restricts access to system administration tools, including the ability to change resource access privileges. Nameserver system administration staff use dedicated links on an internal LAN/WAN to access administrative functions that are off limits to others. There is no external access to this LAN. All sessions require user identification by user name and password; access control lists determine what resources a user or user group is allowed to access and use.

The zone nameserver operating systems will perform security-relevant logging functions, including:

• **User Login**—Whenever a user login is attempted, whether successful or not, the event is logged. The logged information includes the user ID, time, and device requested.

• **User Accounting**—Logs every process executed by every user. The output includes date and time, user ID, point of entry, process, resources accessed, and result of the operations. This log may be selectively viewed for actions performed by a specific user or users.

• **System Logging**—This inherent, configurable logging capability permits monitoring the kernel, user processes, and the mail and authorization systems. In addition, the operating system detects when file access privileges have been changed and also audits the use of telnet, finger, rsh, exec, talk, and similar operations.

**Application Security**

The zone nameserver essentially enables the public to make DNS queries via the Internet. Public services, such DNS queries, rely on the previously discussed network perimeter security devices—edge routers, firewalls, and load balancers—to protect the internal LAN and applications servers.

**O.9.2 Physical Security**

NeuStar vigorously enforces physical security measures, controlling all access to our facilities. Throughout normal working hours, security personnel stationed at each building entrance verify that employees are displaying proper identification badges, and they control access by nonemployees, who must sign in to gain entrance. The sign-in books are stored for a period of one year. If the purpose of their visit is found to be valid, nonemployees are issued a temporary badge; otherwise, they are denied entrance.

At all times while they are in the facility, visitors must display their badges and must be escorted by a NeuStar employee. We also strictly enforce the policy that employees must wear their badges prominently displayed at all times while in the facility.
In addition to providing physical security by protecting buildings with security guards, NeuStar uses a Cassi-Russco security system with Secure Perfect software to manage access control. The system utilizes proximity card readers with PIN codes for access to the buildings nonpublic areas and biometric readers recognition equipment to control access to the data center. Cameras monitor access points to the building and data center and provide digital recording for archives. All exterior doors are monitored for status. A panic button has been installed for summoning aid, if it is required.

The following table lists salient facts about our physical security mechanisms.

<table>
<thead>
<tr>
<th>NeuStar Physical Security Mechanisms</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Security guards</td>
<td>Physically prevent intruder access; verify employee badges</td>
</tr>
<tr>
<td>Closed-circuit video surveillance cameras</td>
<td>Extend capabilities of security guards; maintain access records</td>
</tr>
<tr>
<td>Intrusion detection systems</td>
<td>Provide audible and visual alarms to notify security personnel in the event of unauthorized entry</td>
</tr>
<tr>
<td>Identity badges</td>
<td>Permanent badges for employees; easily recognizable temporary badges for visitors</td>
</tr>
<tr>
<td>Sign-in registers</td>
<td>Maintained as permanent records for at least one year</td>
</tr>
<tr>
<td>Electronic key badges</td>
<td>Control physical access during off hours; maintain access records</td>
</tr>
<tr>
<td>Palm readers</td>
<td>Restrict physical access to mission-critical rooms within our facilities; maintain access records</td>
</tr>
<tr>
<td>Self-closing doors</td>
<td>Restrict physical access to mission-critical rooms within our facilities</td>
</tr>
</tbody>
</table>

**O.10 Peak Capacities**

*NeuStar proposes a highly scalable Enhanced Shared Registration System (SRS) and nameserver systems that are initially sized for a peak load of three times the average projected workload. The peak load capacity and built-in scalability of the registry system architecture ensures the COTR that adequate capacity is available during initial peak usage periods, and that as usage grows over the life of the registry operations, the Enhanced SRS system infrastructure can scale up smoothly without service disruption.*

To avoid creating bottlenecks for Enhanced SRS, Whois, and nameserver services, NeuStar will engineer for peak usage volumes. In addition, NeuStar will deploy redundant co-active Enhanced SRS data centers—a network of nameserver sites that are sized to handle the projected initial peak volumes. Subsequently, we will add additional zone nameservers to handle the anticipated growth. Our Enhanced SRS, Whois, and nameserver architectures are designed with highly scalable server clusters and connected through networks that can be smoothly scaled up without disrupting the system. Expansion provisions include the following:

- Servers scale from Intel SMP machines to high-end RISC SMP database platforms with shared memory architectures.
- Server processors scale from 2-way to 6-way SMP for the Intel machines and from 2-way to 32-way SMP for the high-end RISC database machines.
- The number of servers in a cluster that uses cluster management software scales from 2-way to 32-way to give near-linear processing scalability.
• The number of servers in a cluster that do not use cluster management software can conceivably scale beyond 32 servers.

• The external telecommunications network connectivity to the Enhanced SRS and nameserver data centers scales from dual T-3 to quad T-3 to hex T-3 connectivity and more as a function of the Enhanced SRS transaction load and the Whois and DNS query loads.

• The internal Enhanced SRS and nameserver LANs consist of a switched Gigabit Ethernet backbone fabric with extensive port expandability.

This subsection describes the peak capacities of the Enhanced SRS, Whois, and nameserver subsystems in terms of the network, server, and database platforms' initial sizing and scalability. NeuStar central backup/recovery, escrow, system/network management, and system administration systems are enterprise-strength hardware and software platforms that can easily handle these management and administrative functions throughout the entire registry operations lifespan. Additional desktop computers and workstations can be added to accommodate growth in staff and workload as usage increases and the registry infrastructure grows. Our maintenance support, help desk, and technical support functions are staffed for the initial peak usage period, and staff can be increased to handle workload surges caused by registry marketing and promotional events.

It should be noted that Delegee database capacity requirements are assumed to be low. For this reason, they have been factored into the Whois database capacity numbers.

**O.10.1 Enhanced SRS Peak Capacity**

The Enhanced SRS provides the core subsystems that handle registrar transaction-based services, including XRP processing, billing and collection, secure Web portal, and back-end database system services. This subsection describes the Enhanced SRS subsystems peak capacity in terms of the initial sizing and scalability of the network, server, and database platforms.

**Network**

The XRP average steady-state transaction load is projected to be 150 transactions per second (tps), or approximately 13 million transactions per day. Since peak transactions are six times the average, we designed for a peak transaction load of 900 tps. The average transaction size is 5,000 bits, which translates to a required telecommunication capacity of 4.5 MBPS. The external communication network connectivity to the Internet is initially sized at two fractional T-3 ISP 20-MBPS local access links, for a total of 40 MBPS to handle XRP transactions and Whois queries. The registry’s VPN between the sites is two T-1 1.544 MBPS. The VPN handles zone database updates, server backup and restore, system/network management, and system administration functions.

**Server Clusters**

The XRP server cluster and the associated applications server clusters are front-ended with load balancers that distribute the transaction processing workload across the servers in each cluster. Distribution algorithms include least connections, weighted least connections, round robin, and weighted round robin.

The XRP server and applications server clusters are initially sized to handle six times the projected steady-state workload, or 900 peak transactions per second. The processing capacity can grow linearly by adding additional servers to the cluster. The total system capacity is a cluster size of 32 SMP 8-way RISC servers.

The Billing and Collection system is sized to handle 200 peak transactions per second, because not every XRP transaction results in a billable service.
Database System
The database system consists of dual high-end RISC machines, each with 2- to 32-way SMP scalability. The initial processing capacity of the database system is 4-way SMP, sized in terms of the Transaction Processing Council Online Transaction Processing (OLTP) benchmark of 2500 transactions per second (tpsC).

The database system can grow to handle eight times the initial projected volume of transaction loads. NeuStar will closely monitor system usage and will scale the database capacity correspondingly.

O.10.2 Whois Peak Capacity
A large percentage of the load on the current registry’s Whois server is caused by data mining. NeuStar will increase network bandwidth and add high-performance database capabilities to the Whois service infrastructure. Our proposed bulk-access services will reduce the Whois load by as much as two-thirds. This subsection describes the Whois subsystems peak capacity in terms of initial sizing and scalability of the network, server, and database platforms.

Network
The peak Whois transaction rate is estimated to be 2,000 queries per second, with an estimated packet size of 10,000 bits. This produces a maximum load of 20 MBPS. Initially, we will provide communication network connectivity for Whois queries between the Internet and each data center as two fractional T-3 ISP local-access links. Although these links initially will not be used at full capacity, they ultimately can carry up to 90 MBPS per data center before we upgrade to larger links.

Whois Server Cluster
Our Whois server cluster is front-ended with load balancers to distribute the transaction processing workload across the servers in each cluster. Distribution algorithms include least connections, weighted least connections, round robin, and weighted round robin.

The Whois server cluster is initially sized to handle 2,000 peak transactions per second. To improve query response time and lighten the load on the database, the Whois servers cache frequently accessed domain names.

The processing capacity can grow linearly by adding additional servers to the cluster. The total system capacity is a cluster size of 32 SMP 6-way Intel servers. NeuStar will closely monitor Whois usage and will increase the system’s capacity to accommodate increasing demand.

Database System
Behind the Whois/Delegee servers are dual mid-range RISC machines, each with 2- to 8-way SMP scalability. Initial processing capacity will be 4-way SMP at 500 tpsC, scalable to 1,000 tpsC. (tpsC is Transaction Processing Council (TPC) Online Transaction Processing (OLTP) benchmark C workload.)

NeuStar is implementing a Whois bulk-load data mart service that will enable the registrars to provide their customers with OLTP bulk query services for data mining of domain names.

O.10.3 DNS Query Peak Capacity
During the initial land rush period when registrars are marketing the expanded usTLD domain name extensions, DNS query traffic is expected to be moderate because of less caching further down the DNS hierarchy. Moreover, the query load will not approach current dot-com/dot-net/dot-org levels until more than five million names are registered. Although NeuStar is
proposing three nameserver sites at roll-out, we will closely monitor the load to project the need
to add another site.

NeuStar’s registry handles DNS queries at the nameservers. This subsection describes the
nameservers’ peak capacity in terms of the network, server, and database platforms’ initial
sizing and scalability. NeuStar’s design will easily scale as load increases.

**Network**

NeuStar anticipates a peak load of 5,000 DNS queries per second at each nameserver data center
and estimates the average query package size to be 1,600 bits. This load produces a required
telecommunications network bandwidth for DNS queries of 8 MBPS. To provide this
bandwidth, we will provision two fractional T-3 access links to the Internet at each zone
nameserver site. The nameserver data centers will easily process a peak load of 40,000 queries
per second with more than 100 percent reserve capacity.

**Zone Nameservers**

Our DNS nameserver cluster will be front-ended with load balancers to distribute the
transaction processing workload across the nameservers in the cluster. Distribution algorithms
include least connections, weighted least connections, round robin, and weighted round robin.

The nameserver cluster is initially sized to handle three times the projected steady-state
workload, or 5,000 queries per second. To improve query response, the entire zone will be held
memory resident.

Processing power can grow linearly by adding additional servers to the cluster up to its total
system capacity: a cluster size of 32 SMP 6-way Intel servers. NeuStar will closely monitor
system usage and will scale up as required.

**Database System**

The nameserver database update systems use Intel machines with up to 6-way SMP scalability
to perform snapshot replication of updates to the nameserver database. Since the snapshot
replication is triggered at regular intervals, the initial nameserver database update system is
sized as a 2-way SMP database server, which is more than adequate to distribute the zone file
updates.

**O.11 System Reliability**

*To provide continuous access to usTLD registry data and applications, NeuStar proposes the*
*use of two co-active data centers, geographically separated and continuously online. Each data*
*center incorporates redundancy and nonstop, high-availability features in its hardware and
software configurations.*

Today, business lives in an environment of global economies, increasing competition, ever-
changing technologies and markets, population mobility, and other uncertainties. It becomes
increasingly evident that the ability of a business to quickly and intelligently respond to these
changing conditions depends directly on the availability, timeliness, and integrity of its
information resources. The Information Technology industry has responded to this need with a
variety of high-availability systems whose costs depend on the size of the necessary databases
and on service-level agreements covering system availability. Thus, a TLD registry’s selection of
a high-availability solution is not only a significant investment but also a crucial decision that
can determine the registry’s success or failure.

usTLD applicants must realize that few businesses can afford to be without access to mission
critical applications, nor can they tolerate system failures that lead to excessive downtime and
denial of service. Furthermore, few end users would consider a system to be “available” if
system performance drops below some acceptable level or if the system is only available to some subset of the user community. How useful is the fact that a system can perform a zillion tpm or execute a query in milliseconds without knowing its availability and the cost of achieving its performance and availability?

NeuStar is proposing two co-active data centers for usTLD registry operations and a network of nameservers. These facilities are geographically dispersed to minimize the possibility of outages caused by natural or man-made disasters. The nameservers are dual-homed to each data center via a VPN backhaul link. As Exhibit O-15 indicates, the two data centers are interconnected by high-speed, alternate-routed VPN links. The VPN network management system includes a “heartbeat” signal from each data center. If it detects a failed heartbeat at one data center, it automatically routes all traffic to the other.

Each data center will have redundant network components, high-availability server clusters, and redundant database servers to eliminate single points of failure. All critical telecommunications access links and network components—routers, firewalls, LAN switches, and server NIC cards—will be redundant. Anything less would be inadequate to provide the service levels that the COTR and the industry deserve.

**O.11.1 Quality of Service and Performance Measurements**

*Exhibit O-15. In the event of a disaster at one of NeuStar's two co-active data centers, the other is sized to manage all registry operations with little or no service degradation, thereby safeguarding the integrity of the Internet.*

Neustar understands the importance of quality of service as it pertains to the usTLD. The systems and operations used to be reliable and have a high level of performance. But quality of service is only a subjective opinion unless one provides objective measures of performance and reliability. For example the Enhanced SRS must have a high level of availability for the
registrars and provide response times. Both of these functions can be measured, monitored and reported.

NeuStar believes Performance Measurements are so important to the proper functioning of the usTLD Administrator we have integrated detailed performance measurements into our usTLD Administrator Registrar Agreements. Not only have we integrated the measurements into the agreement, but we have included credits to be paid to the registrars if we fail to meet any one of them.

For a detailed description of the performance measurements please see Exhibit G of the usTLD Registrar Contract in Section H of this proposal. For a detailed description of the Performance Credits please see Exhibit H of the same contract in Section H of this Proposal. Section Q of this proposal provides an overview of NeuStar’s capabilities and commitments with regard to Performance Measurements.

### O.12 System Outage Prevention

The NeuStar’s co-active redundant data centers and high-availability server cluster architecture will maintain continuous operations with no disruptions in service. The benefit is improved system availability, minimum downtime, and high confidence in the Internet registry services.

The Internet community requires outage prevention measures specifically designed to minimize system downtime. Downtime can be categorized as either unplanned or planned:

- **Unplanned downtime** is caused by failures in external telecommunications, power, or internal network or computer equipment.

- **Planned downtime** occurs when the system is unavailable due to scheduled maintenance (e.g., during software or hardware upgrades and system backups). Planned downtime is normally minimized in two ways:
  - By performing backups, maintenance, and upgrades while the system remains operational (hot), or
  - By reducing the time required to perform tasks that can be performed only while the system is down.

In addition to employing the above measures for minimizing planned downtime, system designers may use redundancy and high-availability system architectures designed to minimize unplanned outages. Many data management operations will also have disaster recovery agreements with a business continuity provider who provides a disaster recovery site geographically separated from the operational data center. The intent is to maintain continuity of operations in the event of a natural or man-made disaster.

NeuStar believes these approaches alone, although commendable, are insufficient to meet the high service levels expected by the DOC and the Internet community. For example, the registry services are so specialized and component intensive that no business continuity provider is likely to be capable of resuming services without a lengthy outage period. We contend that the only way to provide satisfactory service levels is through a combination of approaches, including:

- Co-active redundant data centers with two-way transaction replication,
- High-availability server cluster architecture,
- Hot backup/recovery, and
- Automated disaster recovery provisions.
**Procedures for Problem Detection and Resolution**

To best meet data center requirements for availability, flexibility, and scalability, NeuStar has designed a high-availability architecture that will combine multiple computers into a cluster. Nodes in the cluster will be loosely coupled, with each node maintaining its own processor, memory, operating system, and network connectivity. Our system/network management and cluster management tools will automatically detect and compensate for system and network faults and notify system operators.

At five-minute intervals the network management system will “ping” network devices with Simple Network Management Protocol (SNMP) for availability and poll them for performance statistics. Event threshold violations or error conditions will initiate a sequence of alerting events, including visual notifications via a topology map, an entry into a trap log of event records, e-mails to a bulletin board, and notices to technical support staff. The goal is to detect and repair potential problems before services are disrupted.

An SNMP daemon will be configured to periodically check the status and health of vital server processes. In the event of a critical process failure, the SNMP agent will send a trap to the network management system, initiating an alert to the technical support staff. Our network management software will include remote monitoring and management of operations, so technical support staff can easily diagnose and troubleshoot network faults, either from the Network Operations Center or remotely. Once a problem is detected, it will be resolved using our proven problem management process. In conjunction with this problem management process, we will employ proactive performance management and trend analysis processes to do root cause analysis and discover performance and utilization trends that could lead to potential problems.

The cluster management software will organize multiple nodes (up to 16) into a high-availability cluster that delivers application processing support to LAN-/WAN-attached clients. The cluster software, which will monitor the health of each node and quickly respond to failures to eliminate application downtime, will automatically detect and respond to failures in the following components:

- System processors,
- System memory,
- LAN media and adapters,
- System processes,
- Applications processes, and
- Disk drives.

Since high availability is a primary design goal, a cluster cannot have a single point of failure; accordingly, we will employ RAID mirrored disk drives and multiple LAN connections. The cluster software will monitor these hardware and software components and respond by allocating new resources when necessary to support applications processing. The process of detecting failures and restoring the applications service will be completely automated—no operator intervention will be required.

**Redundancy of Data Centers and Systems**

NeuStar is proposing redundant co-active data centers: one in Virginia and one in Illinois. These data centers will be interconnected by redundant, high-speed, secure VPN telecommunications links to provide two-way replication of all registry database transactions. A heartbeat monitor will determine the online status of each data center and enable the services to be provided entirely from the second data center if one is lost.
Within each data center, the system will be redundantly configured so that failure of any system component will leave a configuration of surviving system components capable of executing the entire workload within 95 percent of the previous performance for at least 90 percent of users. To achieve no-single-point-of-failure architecture, NeuStar will replicate all components and configure the system for automatic failover.

The following table describes the system architecture redundancy we will employ at each Enhanced SRS data center to meet 99.9+ percent service availability levels.

<table>
<thead>
<tr>
<th>System Redundancy Elements</th>
<th>Issue</th>
<th>Redundancy Solution</th>
<th>Benefit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single failure of a system component</td>
<td>Replicate all critical components to eliminate single point of failures</td>
<td>The system is capable of executing the entire workload.</td>
<td></td>
</tr>
<tr>
<td>Maintaining availability of applications</td>
<td>Stateless N+1 node high-availability processor clusters</td>
<td>In event of a processor failure, service is not degraded.</td>
<td></td>
</tr>
<tr>
<td>LAN Interface or cable failure</td>
<td>Multi-path LAN I/O</td>
<td>Automatic switchover from one LAN switch to another to restore connectivity</td>
<td></td>
</tr>
<tr>
<td>Disk controller or cable failure</td>
<td>Multi-path disk I/O</td>
<td>Applications take alternate routes</td>
<td></td>
</tr>
<tr>
<td>Disk storage module failure</td>
<td>Redundant Array of Independent Disks (RAID, levels 1, 3, and 5)</td>
<td>Applications still have access to data in the event of a single disk failure</td>
<td></td>
</tr>
<tr>
<td>Hardware/software upgrades and additions or changes to the configuration</td>
<td>N+1 redundancy allows hot repair/upgrade of system components.</td>
<td>Eliminate downtime due to administrative and maintenance tasks</td>
<td></td>
</tr>
<tr>
<td>Dynamic processor de-allocation</td>
<td>Dynamically take a processor out of service to modify the physical and logical configuration of the system.</td>
<td>Eliminate downtime due to maintenance tasks and component replacement</td>
<td></td>
</tr>
<tr>
<td>Replace disks</td>
<td>RAID drives and controllers allow hot plug-in of disk modules</td>
<td>Eliminate downtime due to maintenance tasks</td>
<td></td>
</tr>
</tbody>
</table>

**Hot Repair of System Components**

Another advantage of system redundancy is that it will enable our maintenance staff to use hot repair or replacement of system components. Keeping the system in full operation while we perform such common system administration tasks as upgrading the hardware or software or adding to or changing components will eliminate the MTTR (Mean-Time-To-Repair) factor and will minimize downtime. Hot repair is possible only when major system components are redundant, as in the NeuStar solution.

**Backup Power Supply**

Each Enhanced SRS and nameserver data center will be provided with UPSs to ride through brief electrical transients and outages. For more than brief outages, each Enhanced SRS data center will have a 1,000 KVA generator and the nameserver data center will have a 250 KVA generator capable of running the entire data center in the event of a lengthy electrical blackout.

**Facility Security**

As discussed in Registry Operator’s Proposal Section O.10, NeuStar will vigorously enforce physical security measures that control all access to our facilities. Throughout normal working hours, security personnel stationed at each building entrance will verify that employees are displaying proper identification badges and will control access by nonemployees, who must sign in to gain entrance. The sign-in books will be stored for a period of one year. If the purpose
of a nonemployee’s visit is found to be valid, he or she will be issued a temporary badge; otherwise, entrance will be denied. At all times while they are in the facility, visitors must display their badges and must be escorted by a NeuStar employee. We will also strictly enforce the policy that employees wear their badges prominently displayed at all times while in the facility. During off hours (6:30 p.m. to 6:30 a.m. and all day on weekends and major holidays), individuals must use the proper electronic key cards to gain access to the building. We will issue electronic key cards only to employees who need access for business purposes.

In addition to being stationed at building entrances during normal working hours, on-site security personnel will be on duty 24 hours a day and 7 days a week to monitor the images from closed-circuit television cameras placed strategically throughout the facilities. Further, any room housing sensitive data or equipment will be equipped with a self-closing door that can be opened only by individuals who activate a palm print reader. Senior managers will establish the rights of employees to access individual rooms and ensure that each reader is programmed to admit only those authorized individuals. We will grant access rights only to individuals whose duties require them to have hands-on contact with the equipment housed in the controlled space; administrative and customer service staff normally do not require such access. The palm readers will compile and maintain a record of individuals who enter controlled rooms. The following table lists our physical security mechanisms.
Physical Security Provisions

<table>
<thead>
<tr>
<th>Mechanism</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Security guards</td>
<td>Physically prevent intruder access; verify employee badges</td>
</tr>
<tr>
<td>Closed-circuit video surveillance cameras</td>
<td>Extend capabilities of security guards; maintain access records</td>
</tr>
<tr>
<td>Intrusion detection systems</td>
<td>Extend capabilities of security guards to building perimeter</td>
</tr>
<tr>
<td>Identity badges</td>
<td>Permanent badges for employees; easily recognizable temporary badges for visitors</td>
</tr>
<tr>
<td>Sign-in registers</td>
<td>Maintained as permanent records for at least one year</td>
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<td>Restrict physical access to mission-critical rooms within our facilities</td>
</tr>
</tbody>
</table>

Technical Security

Registry Operator’s Proposal Section O.10 also describes the technical security measures that NeuStar proposes. We will use the underlying user ID and password security features of the XRP, supplemented by system-based Public Key Infrastructure (PKI) services to provide additional security. The following table lists the systems, protocols, and devices to prevent system hacks, break-ins, data tampering, and denial-of-service attacks.

Database and Operating System Security

<table>
<thead>
<tr>
<th>Technical Security System Element</th>
<th>Features and Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Access control system: user ID and password, file level access control lists</td>
<td>Ensures that the user can access authorized functions, but no others, and can perform only authorized operations within these functions. For example, the registrar of a registered domain name is authorized to query it and then renew or cancel it or change its nameservers but cannot query domain names held by other registrars.</td>
</tr>
<tr>
<td>Database: user ID and password, user profiles</td>
<td>Limits database access to pre-authorized users.</td>
</tr>
<tr>
<td></td>
<td>Retains the last two passwords and disallows their usage.</td>
</tr>
<tr>
<td></td>
<td>Rejects simultaneous sessions by an individual user.</td>
</tr>
<tr>
<td></td>
<td>Stores user profiles.</td>
</tr>
<tr>
<td></td>
<td>Limits access rights to database objects and functions to a specified user or user group.</td>
</tr>
<tr>
<td></td>
<td>Rejects unauthorized access attempts. Automatically revokes identification codes after a preestablished number of unsuccessful attempts.</td>
</tr>
<tr>
<td></td>
<td>Provides an interface to facilitate the online administration of user privileges.</td>
</tr>
</tbody>
</table>

E-commerce Security Features

- SSL v3.0 protocol: HTTPS encryption ensures that messages between the registry and registrars/delegates can be read only by the intended receiver.
- Digital signatures: Issued by an X.509 authentication server, digital signatures ensure that the incoming data actually has come from the purported sender; provides nonrepudiation.
Database and Operating System Security

<table>
<thead>
<tr>
<th>Technical Security System Element</th>
<th>Features and Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Router</td>
<td>Permits only DNS UDP/TCP packets to enter the data center LAN, thus isolating the TLD system from most potentially damaging messages.</td>
</tr>
<tr>
<td>Firewall</td>
<td>Guards the secure TLD LAN from the nonsecure Internet by permitting the passage of only packet flows whose origins and destinations comply with preestablished rules.</td>
</tr>
<tr>
<td>Intrusion detection</td>
<td>Detects intrusion at the LAN level. Displays an alert at the usTLD network operations workstation and creates a log entry.</td>
</tr>
</tbody>
</table>

Availability of Backup Software, Operating System, and Hardware

Registry Operator’s Proposal Section O.7 describes our zero-downtime/zero-impact backup process, which will use backup servers, disk array, and a DLT robotic tape library. The dedicated backup system will be independent of the registry server clusters that run the applications.

System Monitoring

The subsection entitled “Procedures for Problem Detection and Resolution” describes system monitoring capabilities and procedures. Our Network Management System and specialized element managers will monitor specific routers, LAN switches, server clusters, firewalls, applications, and the backup servers. In addition, the cluster management software will monitor the status and health of processor, memory, disk, and LAN components in the high-availability cluster.

Technical Maintenance Staff

The NeuStar three-tier customer service approach will ensure that all problems are resolved by the appropriate party in a timely manner.

The Technical Support Group will operate from the Help Desk Network Operations Center (NOC) within the data centers. The group will comprise system administrators, network administrators, database administrators, security managers, and functional experts in the TLD registry IT systems and applications infrastructure. usTLD registry customers access the Technical Support Group through the Tier-1 Help Desk. This group will resolve trouble tickets and technical problems that have been escalated to them by the Help Desk Customer Service Agents. If the problem involves a hardware failure, the Technical Support Group will escalate the problem to our Tier-3 on-site maintenance technicians, third-party maintenance providers, or our hardware vendors, depending on the nature of the problem.

Server Locations

NeuStar’s registry servers will be located in the Enhanced SRS data centers in Virginia and Illinois. Two zone nameserver centers will be collocated with the registry data centers; the remaining nameserver center will be California, with dual-homed telecommunications links and redundant high-availability servers to provide resilience and disaster recovery.

O.13 System Recovery Procedures

NeuStar is proposing two co-active Enhanced SRS data centers and a network of nameserver data centers geographically dispersed to provide redundancy and to enable us to responsibly recover from unplanned system outages, natural disasters, and disruptions caused by human
error or interference. The COTR and the Internet community can be confident that we will respond to unplanned system outages quickly with little or no loss of services.

To maintain public confidence in the Internet, the COTR surely desires a high level of system recovery capabilities. Proven industry solutions to the problems of outages and disaster recovery incorporate high-availability system architectures and fast failover from the primary data center to a mirrored backup. High-availability solutions minimize downtime with availability of 99.9 percent or greater. Continuously available solutions go a step further with virtually zero downtime, creating an availability of approximately 99.999 percent (five nines).

System recovery architectures include:

- **Symmetric Replication**— The database replication (on the backup or failover system) is identical to the primary database on the production system because any change made to the primary database is “replicated” in real time on the backup database. Since this is not a “two-phase commit” process, a small window of vulnerability exists, during which changes made to the primary system could be lost in transit. Replication may increase transaction times, but switching from the primary database to the backup can be very fast and essentially transparent to end users.

- **Standby Databases**— A standby database—a special case of replication—at a backup site originates as an identical copy of the primary database. Changes (updates, inserts, and deletes) to the primary database are recorded in transaction logs that are periodically archived. Archived logs are delivered to the backup site and applied to the standby database. In a best-case scenario, the standby system is behind (in terms of data currency) the primary system by the number of changes contained on the current transaction log.

- **Remote Data Mirroring**— This is the classic disk-mirroring procedure, except it is conducted at a long distance. Depending on whether hardware or software mirroring is used, the performance impact can vary from minimal to significant. Switchover to the backup site can be quick and virtually transparent to end users. The loss of data is zero, although a “system crash” type of database recovery is needed.

NeuStar’s system recovery solution is based on running mission-critical Enhanced SRS applications at two co-active data centers (separated by nearly 700 miles) with database replication technology that maintains database synchronization between the two centers. To provide backup for DNS queries, we are implementing multiple nameserver data centers, also physically separated by long distances. We recognize that system management and recovery are more difficult when the system is spread over a large geographical area; however, two-way replication between the co-active Enhanced SRS data centers will keep the registry master databases identical.

### O.13.1 Restoring Enhanced SRS Operations in the Event of a System Outage

Believing that prevention of failure is better than restoring after failure, and to maximize availability and eliminate the possibility that a single-point failure could shut down operations, we implemented each of the co-active Enhanced SRS data centers and three nameservers with:

- Redundant components with no single point of failure;
- High-availability cluster architecture;
- Load balancers, which are used primarily to distribute the processing load across multiple servers and to defend against common denial-of-service attacks that can precipitate outages caused by processor overloads;
- Redundant hardware; and
• Data backup/restore systems that work together to avoid unplanned outages. (Naturally, the primary function of these systems remains quick recovery, if such an outage should occur.)

The recovery mechanisms we will implement include:

• Full backup and continuous, incremental backup CD-ROMs and DLT tapes are maintained at the data center and at the secure escrow facility. These backups enable us to recover, rebuild, and return the operating system, application software, and databases to operation.

• Processor nodes in the cluster are monitored (and controlled) by cluster management software to facilitate recovery of software applications in the event of a processor failure.

• In the event of a database failure, redundant database software fails over to the replicated backup database, enabling applications that use database services to recover operations seamlessly.

• Processors in high-availability clusters have dual attached ports to network devices and RAID disk arrays, enabling them to recover from a failure in a single port or disk drive.

• Our high-availability clusters are sized to run at peak load. If a processor fails, the excess capacity in the cluster handles the full processing workload while the failed node is repaired or replaced. In essence, this is instantaneous recovery.

The remainder of this subsection describes how we would recover from a system-wide disaster, that is, one that disables an entire data center. Subsection O.14.3 discusses recovery from various types of component failures.

Each of the co-active data centers is sized to take over the entire load of the Enhanced SRS operations, and each zone nameserver is dual-homed to each data center. With this architecture, recovery in the event of a disaster is nearly instantaneous. Sessions that were dropped by the data center that suffered the disaster are simply restarted on the remaining data center within seconds. The following are the main issues that our disaster recovery strategy solves:

• Instead of having a primary and a backup data center, we use two co-active data centers whose data and applications are kept synchronized by two-phase commit replication. Because the XRP servers are configured to retry failed transactions, neither registrars nor users submitting queries will perceive any degradation in service.

• If a data center goes off-line, the workload is transparently switched to the remaining data center. The transaction latency is limited to the brief time needed to replicate the last transaction to the surviving data center.

• Two-way replication of transactions between the sites keeps each site’s databases in a state of currency and synchronization that is consistent with mission critical availability levels.

The use of co-active data centers with two-way replication between them provides fast, simple disaster recovery that maintains continuity of operations—even in the event of a major disaster. The resulting zero-downtime/zero-impact system not only solves system recovery problems, it also sustains confidence in the Internet. The following are the procedures that are followed to restore operations if an Enhanced SRS or nameserver data center experiences a natural or man-made disaster:

• Enhanced SRS or nameserver operations are immediately failed over to the co-active data centers; registry operations proceed uninterrupted, except for those transactions that were in transit between the two centers.

• We implement the disaster recovery plan for the failed data center and place the disaster recovery team on alert.
Within eight hours, the disaster recovery team is assembled and dispatched to the failed data center to help the local data center personnel stabilize the situation, protect assets, and resume operations.

The disaster recovery team assesses whether the building housing the data center can be used to recover operations.

- If so, the team contacts disaster recovery specialist firms under contract to NeuStar to secure the facility and begin recovery operations.
- If not, the team salvages equipment and software assets to the extent possible and procures an alternate data center facility. NeuStar initiates its contingency plan to reconstruct the data center in the new location, repair and test the salvaged equipment and software, and procure the remaining required components with quick-reaction procedures.

Once the disaster recovery team has stabilized and tested the Enhanced SRS or nameserver equipment, it retrieves the system and application software CD-ROMs and the database backup tapes from the secure escrow. It then rebuilds the data center using the same recovery procedures that are used for restoring components lost in a more limited failure. (Subsection O.14.3 describes these procedures.)

**O.13.2 Redundant/Diverse Systems for Providing Service in the Event of an Outage**

NeuStar is proposing two co-active Enhanced SRS data centers and multiple zone nameserver data centers with high availability clusters and cluster management software that enables multiple node processors, in conjunction with RAID storage arrays, to quickly recover from failures. The server load balancer and the cluster manager software monitor the health of system processors, system memory, RAID disk arrays, LAN media and adapters, system processes, and application processes. They detect failures and promptly respond by reallocating resources.

Dual database servers are coupled to a primary and a backup database and RAID configuration to ensure data integrity and access to the database. The database system uses synchronous replication, with two-way commits to replicate every transaction to the backup database. The process of detecting failures and restoring service is completely automated and occurs within 30 seconds with no operator intervention required.

**O.13.3 Process for Recovery From Various Types of Failures**

The following table lists the possible types of failures and describes the process for recovery.

<table>
<thead>
<tr>
<th>Failures Affecting the Nameserver Sites</th>
<th>Recovery Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nameserver cluster processor fails</td>
<td>Cluster management software logs out the failed processor and processing continues on the remaining nodes in the cluster.</td>
</tr>
<tr>
<td>Internet or VPN link fails</td>
<td>Ongoing sessions are dropped and restarted on the other redundant ISP or VPN access link.</td>
</tr>
<tr>
<td>Ongoing sessions are dropped and restarted on one of the other nameserver sites</td>
<td></td>
</tr>
<tr>
<td>Edge router, firewall, or load balancer fails</td>
<td>Ongoing sessions are dropped and restarted on the redundant components.</td>
</tr>
</tbody>
</table>
### Failures Affecting the Data Center Applications and Database Server

<table>
<thead>
<tr>
<th>Failure type</th>
<th>Recovery process</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applications cluster processor fails</td>
<td>Cluster management software logs out the failed processor and processing continues on the remaining processors in the cluster.</td>
</tr>
<tr>
<td>XRP server processor fails</td>
<td>Registrar session is dropped from the failed server and restarted on the other XRP server</td>
</tr>
<tr>
<td>Web server processor fails</td>
<td>Cluster management software logs out the failed processor and processing continues on the remaining processors in the cluster.</td>
</tr>
<tr>
<td>Database server processor fails</td>
<td>The operating system automatically distributes load to the remaining SMP processors</td>
</tr>
<tr>
<td>Database disk drive fails</td>
<td>Processing automatically continues on the RAID with no data loss</td>
</tr>
<tr>
<td>Database crashes</td>
<td>The applications processing continues seamlessly on the backup replicate database</td>
</tr>
<tr>
<td>Authentication server fails</td>
<td>Processing automatically continues on the redundant authentication server</td>
</tr>
<tr>
<td>Whois cluster processor fails</td>
<td>Cluster management software logs out the failed processor and processing continues on the remaining processors in the cluster</td>
</tr>
<tr>
<td>A Billing server fails</td>
<td>Processing automatically continues on the redundant B&amp;C server</td>
</tr>
<tr>
<td>Internet or VPN link fails</td>
<td>Ongoing sessions are dropped and restarted on the other redundant ISP or VPN access link</td>
</tr>
<tr>
<td>Router or firewall fails</td>
<td>Ongoing sessions are dropped and restarted on the remaining redundant router or firewall.</td>
</tr>
</tbody>
</table>

In all cases of component failure, system recovery is automatic, with zero downtime and zero impact on system users. The remainder of this subsection (O.14.3) provides additional information about failure recovery considerations for individual components.

**Recovery From a Cluster Processor Failure**

If one processor in a cluster fails, the cluster manager software logically disconnects that processor. While technicians repair or replace it, applications and user sessions continue on the remaining cluster processors. After the failed processor is off line, the following procedures are used to recover it:

1. Testing and troubleshooting with diagnostic hardware and software to determine the root cause (e.g., hardware [CPU, memory, or network adapter] or software [system or application subsystem]);
2. Repairing hardware failures and, if necessary, rebuilding system and applications software from the backup CD-ROM;
3. Testing the repaired processor and documenting the repairs in the trouble ticket; and
4. Logging the processor back into the cluster.

**Database System Recovery**

Our database management system supports continuous operation, including online backup and management utilities, schema evolution, and disk space management. All routine database maintenance is performed while the database is online.

NeuStar’s database server software solution will provide distributed redundancy by implementing synchronous replication from a primary database server to a backup database server. This solution includes automatic and transparent database failover to the replicated database without any changes to application code or the operating system.
If a database system node experiences a hardware failure or database corruption, NeuStar technicians use the following recovery procedures:

1. Test and troubleshoot with diagnostic hardware and software to determine the root cause (e.g., hardware [CPU, memory, network adapter, or RAID disk array] or software [operating system, database system, or monitoring software]).

2. Repair hardware failures and, if necessary, rebuild operating system and applications software from the backup CD-ROM.

3. Test the repaired processor and document the repairs in the trouble ticket.

4. Restore the data files by applying (in the correct sequence) the full backup DLT tapes and the incremental backup DLT tapes maintained in the data center.

5. Log the processor node back into the redundant server configuration and synchronize the database by applying the after-image journal files until the primary and replicate database are fully synchronized. The procedure is as follows:
   - Recreate the database directories and supporting file structure,
   - Insert the full backup tape from the escrow facility and restore the base level backup,
   - Insert incremental backup tapes in the correct order to ensure that they are correctly applied to the base level backup, and
   - Mount the roll forward recovery tapes using the log roll forward recovery and apply them to the database.

O.13.4 Training of Technical Staff Who Will Perform Recovery Procedures

NeuStar technical personnel have an average of five years of data center operations experience, encompassing the high-availability cluster technology, distributed database management systems, and LAN/WAN network management systems that are employed in the recovery process. New hires and transfers to NeuStar’s usTLD registry operations will be given the following training:

- A one-week “usTLD System Overview” course;
- Vendor-offered courses for certification in backup/recovery, cluster management, system management, and network management; and
- On-the-job training on registry operations, including high-availability cluster management, system backup/recovery, database backup/recovery, and system/network management.


NeuStar will use commercially available Unix operating systems, cluster management software, and backup/recovery software to restore the Enhanced SRS and nameserver systems to operation. In addition to providing synchronous replication of registry transactions to the backup server, our database management system will provide data recovery services using the DLT tape backup system. Backup/recovery hardware and software at the Enhanced SRS data center will remotely back up and restore the nameservers over the VPN.

All static applications software and operating systems are backed up to DLT tape volumes and converted to CD-ROM for quick restoration in the event of operating system or application software failures. Backup copies are maintained in the data center for quick access, with additional copies in the secure escrow facility.
O.13.6 Hardware Needed To Restore and Run the System
The two co-active data centers will house the commercial off-the-shelf, redundant cluster servers and dedicated backup/recovery servers that are needed to restore the system to operation.

O.13.7 Backup Electrical Power Systems
Each of the two data centers is configured with a UPS battery backup system that provides sufficient power for 30 minutes of operation. Each one also has a transfer switch connected to 1,000-KVA motor generators that are capable of powering the entire data center for many days without commercial power.

O.13.8 Projected Time for Restoring the System
Two co-active data centers, each with high-availability clusters sized to handle the full projected registry load, provide the Enhanced SRS services.

- If an individual cluster experiences a processor failure, that processor’s applications are transferred to another processor within approximately 30 seconds; however, the remaining processor nodes in the cluster continue applications processing without interruption.
- Since there are two co-active data centers with two-way database replication to maintain database synchronization, even if a natural or man-made disaster eliminates one data center, registry services continue with zero downtime and zero impact on users. The only impact is transitional, with dropped sessions to the XRP server, Whois/Delegee server, and nameservers. Because the protocols re-initiate a failed transaction, even these operations are fully restored in less than 30 seconds with no loss of data or transactions.

O.13.9 Testing the System Restoration Process
NeuStar will test disaster recovery plans and outage restoration procedures annually to ensure that they can effectively restore system operations.

O.13.10 Documenting System Outages
System problem documentation includes the following:

- The system manager and the network manager systems collect performance and utilization statistics on system processors, system memory, LAN media and adapters, routers, switches, system processes, and applications processes.
- The automated help desk database contains documentation on trouble tickets, whether they are generated by the system or generated by the Help Desk.
- The trouble ticket database contains the documentation of the steps taken to resolve trouble tickets.
- The data center manager collates, analyzes, and reports monthly statistics on help desk activities, system utilization and performance, and outages.

O.13.11 Documenting System Problems That Could Result in Outages
NeuStar’s proactive systems management processes include performance management, trend analysis, and capacity planning. These processes analyze system performance and utilization data to detect bottlenecks and resource utilization issues that could develop into outages. Monthly reports on the three processes keep the data center manager apprised of our performance against service level agreements and raise awareness of potential problems that could result in outages.
In addition, NeuStar performs root cause analysis of hardware and software failures to determine and analyze the reason for any failure. On the basis of our findings, we work with vendors to generate hardware service bulletins and software maintenance releases to prevent reoccurrence of these failures.

O.14 Technical and Other Support

In addition to maintaining our central Help Desk and Technical Support Team, NeuStar will offer Web-based self-help support via a Web-accessible portal, which will enable registrars to access our domain name application process, a knowledge base, and frequently asked questions.

NeuStar’s technical support will satisfy several criteria:

- It must support all NeuStar-accredited registrars.
- It must support all current usTLD delegated managers in the existing usTLD locality space.
- It must support registrants in the existing usTLD locality space.
- To support the world’s different time zones, access must be available worldwide, 24 x 7 x 365.
- It must accommodate the anticipated land rush when the expanded usTLD space is opened for registration.

For the expanded usTLD space, NeuStar will conform to the ICANN registry model, which provides a clear, concise, and efficient deliberation of customer support responsibilities. Registrars provide support to registrants, and registries provide support for registrars. This allows the registry to focus its support on the highly technical and administratively complex issues that arise between the registry and the registrar.

For the existing locality-based space, NeuStar will continue to support usTLD delegated managers and registrants in a manner consistent with the way they are currently supported.

O.14.1 Technical Help Systems

NeuStar will provide the following types of technical support, all available on a 24 x 7 x 365 basis:

- Web-based self-help services,
  - Knowledge bases
  - Frequently asked questions
  - White papers
  - Downloads of XRP client software
  - Support for e-mail messaging
- Telephone support from our central Help Desk, and
- Fee-based consulting services.

Web Portal

NeuStar will implement a secure Web-based multimedia portal to help support usTLD customer operations. To obtain access to our Web-based services, customers must have implemented our security features, including SSL encryption, log in with user ID and password, and digital certificates for authentication.
The home page of the Web portal will include a notice to customers of planned outages for database maintenance or installation of software upgrades. This notification will be posted 30 days prior to the event in addition to active notification including phone calls and e-mail. We will also record outage notifications in the help desk database to facilitate compliance with the service-level agreement. Finally, seven days and again two days prior to the scheduled event, we will use both an e-mail and a Web-based notification to remind registrars of the outage.

The general Internet community may obtain generic information from NeuStar’s public Web site, which will describe our usTLD service offerings and list certified registrars and delegated managers providing domain name services.

**Central Help Desk**

In addition to implementing the Web site, we will provide telephone support to our registrars through our central Help Desk. Access to the help desk telephone support is through an automatic call distributor that routes each call to the next available customer support specialist. We will authenticate callers by using caller ID and by requesting a preestablished pass phrase that is different for each registrar. Requests for assistance may also come to the Help Desk via e-mail, either directly or via the secure Web site.

The Help Desk’s three tiers of support are:

**Tier-1 Support**—Telephone support to usTLD Registry customers who normally are calling for help with domain name problems and other issues such as XRP implementation or billing and collection. Problems that cannot be resolved at Tier 1 are escalated to Tier 2.

**Tier-2 Support**—Support provided by members of the Technical Support Team, who are functional experts in all aspects of domain name registration. In addition to resolving escalated Tier 1 problems with XRP implementation and billing and collection, Tier 2 staff provide technical support in system tuning and workload processing.

**Tier-3 Support**—Complex problem resolution provided by on-site maintenance technicians, third-party systems and software experts, and vendors, depending on the nature of the problem.

In turn, the Help Desk uses an automated software package to collect call statistics and record service requests and trouble tickets in a help desk database. The help desk database documents the status of requests and tickets, and notifies the Help Desk when an SLA threshold is close to being breached. Each customer support and technical support specialist uses our problem management process to respond to trouble tickets with a troubleshooting, diagnosis, and resolution procedure and a root-cause analysis.

**Escalation Policy**

Our escalation policy defines procedures and timelines for elevating problems either to functional experts or to management for resolution if they are not resolved within the escalation policy time limits. The following table is an overview of our escalation policy.
### Escalation Policy

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
<th>Escalation Policy</th>
<th>Notification</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>Catastrophic outage affecting overall registry operations</td>
<td>Data center manager escalates to NeuStar management and Disaster Recovery Team if not resolved in 15 minutes</td>
<td>Web portal and e-mail notifications to all Registrars within 15 minutes; updates every 30 minutes</td>
</tr>
<tr>
<td>II</td>
<td>Systems outage affecting one or two XRP sessions but not the entire system</td>
<td>Systems engineer escalates to data center manager if not resolved in one hour</td>
<td>Web portal notification to all customers; hourly updates</td>
</tr>
<tr>
<td>III</td>
<td>Technical questions</td>
<td>Help Desk customer support specialist escalates to the systems engineer if not resolved in two hours</td>
<td>Hourly updates to customer via e-mail</td>
</tr>
<tr>
<td>IV</td>
<td>Basic questions</td>
<td>Help Desk customer support specialist escalates to the systems engineer if not resolved within four hours</td>
<td>Hourly updates to customer via e-mail</td>
</tr>
</tbody>
</table>

#### O.14.2 Staffing

Initially, NeuStar will staff its Help Desk with a complement of customer service specialists, enabling us to operate three shifts providing 24 x 7 x 365 coverage. We will add staff as necessary to respond to incoming requests within the service level agreement. Customer service specialists will obtain assistance from NeuStar’s technical staff for any problems that cannot be resolved in one phone call.

#### O.14.3 Test and Evaluation Facility

NeuStar will establish an operational test-and-evaluation facility that will be available 24 x 7 x 365 for registrars and delegees to test their client XRP system. Our Technical Support Team, which consists of functional experts in the processes and technologies for domain name registration, will support the registrars and delegees.

Once each new registrar/delegee is satisfied that its system is compatible with the registry system, it will schedule a formal acceptance test that will be monitored by our system engineer. After a registrar/delegee has passed the acceptance test, we will issue its user ID, passwords, and digital certificates, and the registrar/delegee can begin operations.

#### O.14.4 Customer Satisfaction Survey

To determine customer satisfaction with registry services, NeuStar will implement a Web-based customer satisfaction survey that will consist of a set of survey questions with responses ranging from one to five on the Likert Scale. We will tabulate the results and publish them on the Web site.

To further verify the quality of our customer services, NeuStar will commission a biannual customer satisfaction survey by an independent third party.