

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Ex. 26

1 UNITED STATES DISTRICT COURT
 2 NORTHERN DISTRICT OF CALIFORNIA
 3 OAKLAND DIVISION

4
 5 PETROLIAM NASIONAL BERHAD)
 (PETRONAS),)
 6)
 Plaintiff,)
 7)
 vs.)
 8)
 GODADDY.COM., INC.,)
 9)
 Defendant.)

ORIGINAL

No. 09-CV-5939 PJH

10

11

12 DEPOSITION OF Jeff Munson, taken on
 Wednesday, October 19, 2011, commencing at 9:00 a.m.,
 at 225 Second Street SE, Cedar Rapids, Iowa, before
 13 Angela L. Maddux, Certified Shorthand Reporter of the
 State of Iowa, pursuant to the within stipulation.

14

15

16

17

APPEARANCES:

18

Perry R. Clark, of the Perry Clark Law Firm,
 Attorney at Law, 825 San Antonio Road, Palo Alto,
 19 California, 94303, Attorney for the Plaintiff.

20

David L. Lansky, of the Wilson, Sonsini,
 Goodrich & Rosati Law Firm, Attorney at Law, 650 Page
 21 Mill Road, Palo Alto, California, 94304, Attorney for
 the Defendant.

22

23

Angela L. Maddux, CSR, RPR
 IRISH REPORTING, INC.
 24 305 - 10th Avenue
 Hiawatha, IA 52233
 25 (319) 393-5050

1		<u>I N D E X</u>	
2	WITNESS	EXAMINATION	PAGE
3	Jeff Munson	By Mr. Perry	3

4

5 ORIGINAL

6 E X H I B I T S

7	NUMBER	MARKED
8	Munson 31	7
9	Anderson 4 & 5	18
10	Munson 32	20
11	Munson 33	30
12	Munson 34	34

13

14

15

16

17

18

19

20

21

22

23

24

25	Certificate of Shorthand Reporter	37
----	-----------------------------------	----

3

1 **JEFF MUNSON**
 2 called as a witness, having been first duly sworn,
 3 was examined and testified as follows:
 4 EXAMINATION
 5 BY MR. CLARK:
 6 **Q.** Good morning. My name is Perry Clark. I'm
 7 a lawyer and I represent the plaintiff in this case,
 8 Petroliam Nasional Berhard, and I will refer to them
 9 as Petronas.
 10 **MR. LANSKY:** And I am David Lansky of
 11 Wilson, Sonsini, Goodrich & Rosati here on behalf of
 12 GoDaddy and the deponent.
 13 **Q.** All right. Could you go ahead and state
 14 and spell your name for the record, please?
 15 **A.** Yeah. Jeff Munson. It is spelled J-e-f-f,
 16 **M-u-n-s-o-n.**
 17 **Q.** And you're currently employed by GoDaddy?
 18 **A.** Yes.
 19 **Q.** What is your current job title at GoDaddy?
 20 **A.** Development manager.
 21 **Q.** And what are your responsibilities as
 22 development manager?
 23 **A.** We take care of what we call the park web
 24 system, the mask and forwarding system, and we also
 25 take care of a product called cache parking.

5

1 **A.** No.
 2 **Q.** All right. So can you just describe
 3 briefly what Go Daddy's park web system is?
 4 **A.** Yes. When a customer registers a domain,
 5 that domain is parked and so I take care of those.
 6 So if somebody registers a domain, and then they go
 7 in the web browser and type in that domain, if it is
 8 parked in our parked web system I show the parked
 9 page.
 10 **Q.** And just briefly if you can describe what
 11 the forward and masking -- let me ask you this.
 12 Would you call forward and masking a product or would
 13 you refer to it as a system?
 14 **A.** Yes, in my mind it is a system.
 15 **Q.** So can you just briefly describe the
 16 forward and masking system?
 17 **A.** Sure. We have upstream customers can
 18 choose to enable forward and masking on their domain.
 19 And my system what it does is it takes a request from
 20 the web, so if you have your domain set up to be
 21 forward and masked, my system will take that request,
 22 it will look into, take the domain name, look in the
 23 database and say are you forwarded? If you're not
 24 forwarded, I ask are you masked? And based on what
 25 you are, if you're forwarded or masked, I will serve

4

1 **Q.** I'm sorry, what was the second one you
 2 said?
 3 **A.** Forward and masking system.
 4 **Q.** Forward and masking system?
 5 **A.** Yes.
 6 **Q.** And the last one was cache parking?
 7 **A.** Yes. And I want to qualify the forward and
 8 masking sytem, it is the back end forward and masking
 9 system.
 10 **Q.** All right. How long have you worked at
 11 GoDaddy?
 12 **A.** I have worked there since November 30th of
 13 2004, so that would put it at almost seven years now.
 14 **Q.** Has your job title always been development
 15 manager?
 16 **A.** No. I came in as what we call a dot net
 17 developer which is a programmer. I became a
 18 development manager, I can't remember the exact date,
 19 in 2009 or '10, somewhere in there.
 20 **Q.** So do you have an undergraduate degree, a
 21 university degree?
 22 **A.** Yes. I have a bachelor of business
 23 administration and management information systems
 24 from the University of Iowa.
 25 **Q.** Do you have any post graduate --

6

1 back an HTTP response to the browser. I will serve
 2 back an HTTP response, a correct response, whether it
 3 is a 301, which is that location has changed and
 4 please update your links to change to that location;
 5 or a 302 which means a temporary forward, or a 200
 6 which serves back HTML in a frame set so the domain
 7 is masked.
 8 **Q.** Okay. I don't have a technical background
 9 at all, and we'll talk about this some more so bear
 10 that in mind. Then lastly cache park, what is cache
 11 parking?
 12 **A.** Cache parking is I will equate it to park
 13 web where you can pay a monthly fee and then we're
 14 share out the advertising revenue on that parked
 15 page.
 16 **Q.** So what is the difference between parked
 17 web and cache parking?
 18 **A.** Parked web, GoDaddy keeps the advertising
 19 revenue on those parked pages. And cache parking, if
 20 you pay a monthly fee to us we'll share out some of
 21 that revenue to you.
 22 **Q.** All right. And is parked web something
 23 that's set up automatically for each registration or
 24 not?
 25 **A.** As far as I know, yes. I'm not completely

7

1 sure, but I'm guessing yes.

2 Q. Okay. I will go ahead and mark this.

3 (Whereupon, Munson Deposition Exhibit

4 Number 31 was marked for identification.)

5 Q. I am going to hand the witness what has

6 been marked as Munson Exhibit 31. If you could go

7 ahead and -- have you ever seen Exhibit 31 before?

8 A. Yes.

9 Q. When did you see it?

10 A. Yesterday.

11 Q. That is when you were preparing for your

12 deposition?

13 A. Yes.

14 Q. How long did you prepare for your

15 deposition?

16 A. I wasn't watching the clock. I would guess

17 one or two hours.

18 Q. And you met with Mr. Lansky?

19 A. Yes.

20 Q. Did you do anything else to prepare for

21 your deposition?

22 A. No.

23 Q. If you could turn to Page 7 of Exhibit 31

24 there's a numbered Paragraph 2 about two-thirds of

25 the way down the page. Do you see that?

9

1 domain names.

2 MR. LANSKY: Objection to form.

3 Q. And for purposes of this deposition, can we

4 agree to refer to the domain names Petronastower.net,

5 Petronastowers.net as the disputed domain names?

6 A. Yes.

7 Q. Can you describe for me the services

8 provided by GoDaddy related to the disputed domain

9 names?

10 A. The services I assume you're referring to

11 are forwarding. Again, I work on the back end of the

12 forwarding system so I can testify to that. I was a

13 programmer on that. And as I explained before what

14 it does is it takes -- I get a web request from a

15 browser. I take the host header -- and when a

16 browser sends a request to a web server there's a

17 header involved and it specifies a get and it has a

18 host in that header. I take that host and I look up

19 that host in to my sequel database.

20 So the first thing I do is I query a

21 database to see if that domain name is to be

22 forwarded. If it is to be forwarded, I get a result

23 sent back from the database that tells me where to

24 forward it to and what type of forward to do. The

25 type of forward being a 301 which means a permanent

8

1 A. Yes.

2 Q. That paragraph says, "The services provided

3 by GoDaddy related to the disputed domain names,

4 including technical aspects of routing/forwarding the

5 disputed domain names." Do you see that?

6 A. Yes.

7 Q. And you understand you have been designated

8 to testify as GoDaddy's representative on that topic?

9 A. Yes.

10 Q. Then if you could turn to Page 11 of

11 Exhibit 31, there is numbered Paragraph 34 on that

12 page. It says, "Policies, procedure, guidelines,

13 rules, standards, and protocols relating to the

14 functioning and use of personal computers and local

15 area networks which may have been used to create or

16 process electronically stored information referencing

17 or relating to the subject matters." Do you see

18 that?

19 A. Yes.

20 Q. And do you understand you have been

21 designated to testify on that topic as well?

22 A. Yes.

23 Q. Great. So why don't we start with topic

24 two. Can you go ahead and describe for me the

25 services provided by GoDaddy related to the disputed

10

1 to the browser, means a permanent redirect; or a 302

2 which means a temporary redirect. So whoever the

3 registrant is of that domain name, somewhere they set

4 up the forwarding and that address goes in to a

5 database to forward it to and I take that address and

6 I forward the domain name to that address.

7 Q. So when you use the phrase "back end", can

8 you describe what you mean or elaborate more?

9 A. Yes. When a registrant forwards their name

10 they go to what is called our domain manager commonly

11 referred to as DCC where they manage our domains.

12 Within that application that can actually say I want

13 to forward or mask this domain. So the registrant

14 will go in and they will type the address that they

15 want to forward to, or specify the address they want

16 to set up masking for. So that's what I would call

17 the front end.

18 The middle piece, there's another middle

19 piece that I don't work on, but this middle piece

20 takes that information that was put in to that

21 interface, and what it does is it writes to the

22 database that I read from the back end. So that's

23 what I mean by back end. There is a front end where

24 user puts in the information, and middle end that

25 sets up the data for me, the back end.

11

1 **Q.** On the back end let's talk a little bit
 2 about the hardware that's involved. I assume there
 3 some sort of server?
 4 **A. Yes. There are seven Windows servers.**
 5 **Operating system is Windows 2003. It is running**
 6 **Internet Information Server 6.0, and that's the main**
 7 **hardware footprint that we have.**
 8 **Q.** So these seven servers would you refer to
 9 these as the forwarding servers?
 10 **A. Yes.**
 11 **Q.** And these are servers owned by GoDaddy?
 12 **A. Yes.**
 13 **Q.** And where are they located?
 14 **A. I'm not exactly sure. I think they're**
 15 **located in Mesa, Arizona. Our data center in Mesa,**
 16 **Arizona.**
 17 **Q.** And GoDaddy has exclusive control over
 18 these servers?
 19 **A. Yes.**
 20 **Q.** And so these servers are running you
 21 said -- I'm sorry, what was the name of the program?
 22 **A. The operating system is Microsoft Windows**
 23 **2003.**
 24 **Q.** And then what was the server application
 25 called?

13

1 more about the implementation of the forwarding
 2 service on the Internet Information Server? For
 3 example, did you have to write the code for that?
 4 **A. Yes.**
 5 **Q.** You did?
 6 **A. Yes.**
 7 **Q.** Were you the only one who wrote the code?
 8 **A. Yes, I was.**
 9 **Q.** Was that written in, what, C Plus?
 10 **A. C Sharp.**
 11 **Q.** Approximately how long did it take to write
 12 the code?
 13 **A. I would say two weeks.**
 14 **Q.** Now, the domain name forwarding that's
 15 being implemented on the Internet information server,
 16 does that implement domain name -- let me start over.
 17 Is another word for domain name forwarding
 18 a URL redirect?
 19 **A. Yes, I would refer to that as that, yes.**
 20 **Q.** Is the URL redirect function described in
 21 any sort of standard that you're aware of?
 22 **A. I think, yes, it is described in the HTTP**
 23 **standard, HTTP one dot one. If you go out and look**
 24 **you can see definitions for 301 and 302.**
 25 **Q.** So when you were referring to 301 and 302

12

1 **A. The web server is Internet Information**
 2 **Server 6.0.**
 3 **Q.** Is that a Microsoft program also?
 4 **A. Yes, it's a Microsoft product.**
 5 **Q.** So you use the Internet Information Server
 6 6.0 to implement the forwarding service?
 7 **A. Yes.**
 8 **Q.** Is that the program you've always used to
 9 do forwarding at GoDaddy?
 10 **A. Yes.**
 11 **Q.** When did GoDaddy first start offering
 12 domain name forwarding?
 13 **A. I don't know because I picked up the system**
 14 **in 2006. It was like April, May of 2006. Before**
 15 **that was on an Apache Linux system, so I don't know**
 16 **when they started to do forwarding.**
 17 **Q.** So you were there when the cutover from
 18 Apache Linux to Internet Information Server took
 19 place?
 20 **A. Yes.**
 21 **Q.** Do you happen to know, was that just for
 22 the forwarding servers or did GoDaddy switch away
 23 from Apache Linux for all of its servers?
 24 **A. It is just for the forwarding.**
 25 **Q.** Okay. So can you tell me the little bit

14

1 earlier you're talking about an HTTP 301 and 302 URL
 2 redirects?
 3 **A. Yes.**
 4 **Q.** And did you use that HTTP standard in
 5 writing the code for the domain name forwarding
 6 system?
 7 **A. I didn't necessarily use the standard. I**
 8 **know that I used code where I would return the 301.**
 9 **Like for example, in C Sharp you can do what's called**
 10 **a response dot redirect. That directs Internet**
 11 **Information server to respond with that 302 header,**
 12 **and it does the response itself.**
 13 **For the 301 what we did is we set the**
 14 **response code ourselves at 301, and then set the**
 15 **location and the header manually to come back, but I**
 16 **believe it follows the standard.**
 17 **Q.** Is the version of the domain name
 18 forwarding system that you drafted back in 2006 the
 19 same version that GoDaddy uses today?
 20 **A. There were some minor tweaks because we**
 21 **added the 301 a little bit later. I didn't do the**
 22 **301 in 2006. I can't recall the exact date we added**
 23 **301, but the 301 was added functionality at a later**
 24 **date.**
 25 **Q.** Is the 301 a temporary redirect?

15

1 **A. No, it is a permanent redirect.**
 2 **Q.** And can you explain a little bit the
 3 difference between the 301 and the 302 redirects?
 4 **A. Yes. A 301 redirect, what it tells**
 5 **browsers and I think the main reason why customers**
 6 **were requesting it is because it also tells search**
 7 **engines to, you know, your Google spider and your,**
 8 **whatever, Yahoo spider, to go in to that new location**
 9 **and to update the links.**
 10 **Whereas a 302 search engines would just**
 11 **ignore it, browser would just ignore it and it would**
 12 **be a temporary redirect. A 301 is better for search**
 13 **engine optimization. So we had customers asking if**
 14 **we could implement 301 redirects for us. So we**
 15 **responded to that request and added that**
 16 **functionality.**
 17 **Q.** When was that added?
 18 **A. I can't recall for sure. I want to say**
 19 **sometime 2007, 2008. Somewhere in there.**
 20 **Q.** A year or so after you originally drafted
 21 it?
 22 **A. Yes, I think so.**
 23 **Q.** That's fine. Did anybody else work on
 24 setting up the domain name forwarding system at
 25 GoDaddy that you know?

17

1 **sits in front of the seven servers. So when somebody**
 2 **sets -- when DNS sets the a-record to that IP, that**
 3 **traffic will come to that IP and then the traffic**
 4 **will flow down to one of those seven servers.**
 5 **Q.** I want to follow-up on thing you said. You
 6 mentioned customers demand domain name forwarding?
 7 **A. Okay.**
 8 **Q.** Can you tell me a little more about that;
 9 what you know about the customer demand?
 10 **MR. LANSKY:** Object to the form of the
 11 question.
 12 **A. What I know about customer demand is with**
 13 **the forwarding system basically like take -- I'll**
 14 **provide an example. Like CNN dot com is out there as**
 15 **its own Website. So if I were CNN I may want to also**
 16 **have the dot net, dot U.S., dot biz, whatever the**
 17 **other TLDs that they make have registered. They may**
 18 **want to catch that type in traffic, so that somebody**
 19 **may type in and forward that to CNN dot com.**
 20 **Q.** So there were customers who were requesting
 21 the ability to do that type of domain name
 22 forwarding?
 23 **A. That I don't know. That's my personal**
 24 **opinion.**
 25 **Q.** I see. So in addition to adding the 301

16

1 **A. There were probably some Windows engineers**
 2 **that set up the servers. I can't recall who they**
 3 **would be. Probably some networking people that set**
 4 **up -- we have what's called a VIP, I don't know what**
 5 **the acronym stands for, but basically it shows when**
 6 **you set up a vending for forwarding, I'm not a DNS**
 7 **expert, but there is an a-record that gets set with**
 8 **an IP. So we had some network engineers set up that**
 9 **IP so the traffic would come to that IP for a**
 10 **forwarding name.**
 11 **MR. PERRY:** So I don't know, can we go off
 12 the record?
 13 **(Whereupon, a discussion was held off the**
 14 **record.)**
 15 **Q.** So the VIP?
 16 **A. Yes, I refer to it as a VIP.**
 17 **Q.** Maybe virtual IP address, something like
 18 that?
 19 **A. Yes, probably. I don't know for sure.**
 20 **Q.** So what you said was you had a Windows
 21 engineer or someone set up a VIP --
 22 **A. Actually it was a network engineer would**
 23 **have set up a VIP.**
 24 **Q.** What's the function of a VIP again?
 25 **A. The function of a VIP is it's an IP that**

18

1 redirects, were there any other changes made to the
 2 domain name forwarding system that you're aware of?
 3 **A. Not that I can recall.**
 4 **Q.** Now turning back to the topic, are you
 5 aware of any other services that GoDaddy provided
 6 related to the disputed domain names other than
 7 domain name forwarding?
 8 **A. No.**
 9 **Q.** I would like to go ahead and mark this.
 10 **(Whereupon, Anderson Deposition Exhibits 4**
 11 **and 5 were marked for identification.)**
 12 **Q.** I will hand you what has been previously
 13 marked Anderson Exhibit 4, which bears Bates number G
 14 00560 to 561, and Anderson Exhibit 5 which bears
 15 Bates stamp GD000562 to 563. Why don't we start with
 16 Exhibit 4. Can you tell me what Exhibit 4 is?
 17 **A. No.**
 18 **Q.** How about Exhibit 5, can you tell me what
 19 Exhibit 5 is?
 20 **A. No.**
 21 **Q.** Do you know when GoDaddy started providing
 22 domain name forwarding for the disputed domain names?
 23 **A. No.**
 24 **Q.** Do you have any idea how many GoDaddy
 25 customers use its domain name forwarding service?

19

1 **A. No.**

2 **Q.** In addition to domain name forwarding,

3 GoDaddy offers hosting services for customers;

4 correct?

5 **A. Correct.**

6 **Q.** Does GoDaddy use a separate -- well, the

7 seven forwarding servers that we talked about

8 earlier, are those dedicated to the domain name

9 forwarding system?

10 **A. Yes.**

11 **Q.** So GoDaddy uses a different set of servers

12 for its hosting service; correct?

13 **A. Yes.**

14 **Q.** Does GoDaddy use any servers in connection

15 with its domain name registration service?

16 **A. Can you rephrase the question?**

17 **Q.** Sure. Does GoDaddy use any servers in

18 connection with its domain name registration service?

19 **A. I don't work in that area so I can't tell**

20 **you. My guess would be yes, we would have to, I**

21 **mean --**

22 **Q.** Okay. So GoDaddy doesn't use its seven

23 forwarding servers as part of its domain name

24 registration service?

25 **A. No.**

21

1 question is going to be can you tell me what

2 Exhibit 32 is?

3 **A. In looking at it it looks like a help**

4 **article to me.**

5 **Q.** Sure. So there is a reference here to --

6 it says at the top Redirect URLs. Is that the type

7 of URL redirects we were talking about previously

8 that GoDaddy uses for its domain name forwarding

9 service?

10 **MR. LANSKY:** Object to the form.

11 **A. That I don't know because I'm not sure.**

12 **From this article I can't tell how they're actually**

13 **doing the redirect. My guess is it would be yes if**

14 **we're doing 301s, 302s, but --**

15 **Q.** Okay. So down at the bottom you see

16 there's a note that says redirects can be permanent

17 (a 301 redirect) or temporary (a 302 redirect).

18 **A. Yes.**

19 **Q.** Does that help you get a better sense of

20 whether or not they're talking about the same kind of

21 URL redirects that GoDaddy uses for its domain name

22 forwarding service?

23 **MR. LANSKY:** Object to the form.

24 **A. I can't say for sure. But a 301 and a 302**

25 **to the browser looks the same. A 301 comes back as a**

20

1 **Q.** Backing up. So in terms of GoDaddy's

2 hosting service, does GoDaddy provide its hosting

3 service to customers who have registered their domain

4 names with registrars other than GoDaddy?

5 **A. I don't understand the question. I'm**

6 **sorry.**

7 **Q.** So GoDaddy certainly serves as the

8 registrar of certain domain names. And GoDaddy also

9 provides a hosting service; correct?

10 **A. Correct.**

11 **Q.** Does GoDaddy provide its hosting service to

12 customers who have domain names that are registered

13 with other domain name registrars?

14 **A. That I'm not sure. I don't know.**

15 **Q.** Now, GoDaddy offers a Windows hosting

16 service; is that correct?

17 **A. Yes.**

18 **Q.** And it also offers a Linux based hosting

19 service; correct?

20 **A. Yes.**

21 **Q.** So I will go ahead and have marked as

22 Munson Exhibit 32 a document with no Bates numbers.

23 (Whereupon, Munson Deposition Exhibit

24 Number 32 was marked for identification.)

25 **Q.** Why don't you look at Exhibit 32. My

22

1 **status code and there is a location with a URL. Same**

2 **with a 302. I mean, there is a 302 status code with**

3 **the location URL to go to. So I can't say for sure**

4 **but from the looks of it, it would be somewhat**

5 **similar.**

6 **Q.** Do you know if GoDaddy uses its seven

7 forwarding services to provide this URL redirect

8 service described in Exhibit 32?

9 **A. My guess is no.**

10 **Q.** Why do you say that?

11 **A. Why do I say that? Because it says only**

12 **our Linux hosting account offers this URL redirect**

13 **feature. What I wrote isn't on Linux, so it is**

14 **something different.**

15 **Q.** Do you know who is responsible just overall

16 for GoDaddy's Linux hosting service?

17 **A. No, I'm not familiar with that.**

18 **Q.** Why don't you refer back to Exhibit 31, the

19 notice. If you turn to Page 11, please, and look at

20 topic 34. Can you just describe what sort of

21 policies, procedures or guidelines, et cetera,

22 GoDaddy might have that relate to the functioning and

23 use of its computers and networks?

24 **A. Yes. Basically we're not allowed to bring**

25 **any computers in, any personal -- like my personal**

23

1 laptop or anything like that is not allowed in the
 2 door. No flash drives.
 3 As far as the networks go, you know, we
 4 have like secure back ends so you need specialized
 5 access to get places. It is very tightly controlled.
 6 We even watch certain ports so you can't transfer
 7 things out securely. So it's really secure.
 8 Q. Are GoDaddy's policies in this regard set
 9 out in some sort of manual, like employee manual?
 10 A. Yes.
 11 Q. And what's the title of that document?
 12 A. I am not sure what the title of the
 13 document is, but it is in our employee handbook.
 14 Q. Do you know if GoDaddy is ISO 9000
 15 compliant?
 16 A. No, I do not know that.
 17 Q. Now, in terms of managing the GoDaddy seven
 18 forwarding servers, we mentioned two applications;
 19 one that they run on Windows 2003, and that they use
 20 ISS Version 6.0. Are there any other applications
 21 that are run on or are used in connection with those
 22 servers?
 23 A. Yes. There is one application that we use
 24 basically we scan the IIS logs to get the top 20
 25 hosts that request pages because we have a lot of

24

1 denial service attacks, so that helps in our denial
 2 service attack mitigation.
 3 Q. And what program do you use to scan the IIS
 4 logs?
 5 A. We brought our own program. It is called
 6 log parser.
 7 Q. You wrote your own program?
 8 A. We wrote a program that calls log parser,
 9 and log parser will take out the top 20 hosts every
 10 hour and load those to a database so we can see what
 11 hosts are hitting us. So if we have a denial service
 12 where somebody might hit us a million times in an
 13 hour, we can block that domain so it doesn't cause
 14 problems in our network.
 15 Q. So when you say hosts, what do you mean
 16 exactly?
 17 A. When a web request comes in to IIS, there
 18 is what is called -- there is a section of that
 19 header and it is called a host and it specifies a
 20 domain name that the browser is requesting.
 21 Q. Is that the a-record?
 22 A. No.
 23 Q. It is different, okay. So I'm sorry, the
 24 record -- I'm sorry, could you say that again or
 25 elaborate on that?

25

1 A. Sure. When your browser sends a request
 2 through the Web to one of our servers, there is
 3 what's called headers. And one of those headers is
 4 labelled host. Host is a label. And the value of
 5 that host is a domain name. So we will take that,
 6 that domain name gets put in to what is called an IIS
 7 log.
 8 Q. So for example, if I were to type in www
 9 dot CNN dot com, an HTTP request would be sent from
 10 my browser to --
 11 A. To the a-record of CNN dot com.
 12 Q. Which is an IP address?
 13 A. Right.
 14 Q. And then also in that request would be a
 15 header that designates the host name?
 16 A. Yes.
 17 Q. And the host name would be CNN dot com?
 18 A. Right.
 19 Q. So then the server receiving that request
 20 would basically serve up the files associated with
 21 the domain name?
 22 A. Yes. And when the IIS gets that request it
 23 places an entry into a log file. For those
 24 forwarding systems there are bunches of hosts in
 25 there and the log files are just humongous. So that

26

1 program helps us, if we have a D-DOS attack, if
 2 somebody is really hitting us hard, we scan that and
 3 say, okay, this domain has hit us like a million
 4 times this last hour. So we can work with our
 5 security operations team and say, hey, you know.
 6 And sometimes we even have problems where
 7 we get denial service attacks and it basically brings
 8 down our servers. We can scan the logs and say we
 9 have seen this host a million times in the last hour,
 10 so then we work with the security operations team and
 11 they somehow in the network can block a domain so
 12 that it blocks the traffic. I don't know if it is at
 13 the router or fire log or whatever, but it drops that
 14 traffic so our servers can recover and still serve.
 15 Q. So I see, it is like getting a million
 16 requests for CNN dot com in a minute or so?
 17 A. Yes. And we will take the top 20 and it
 18 goes to a database from all seven servers and see a
 19 combined total and we can tell what's hitting us.
 20 Q. Got it. Okay. Now, in your understanding
 21 is setting the a-record or designating the a-record
 22 something that's done as part of the domain name
 23 registration process or something that's done
 24 thereafter?
 25 MR. LANSKY: Object to the form.