

## Comments on Recommendations

<p><b>Recommendation 1 - Strategic Priority</b></p>	<p><a href="#">IHG</a>: Agrees. WHOIS must be central and universal with strong enforcement mechanisms to protect intellectual property and ensure stability. Will require additional compliance staff and budget e.g. one third of surplus should be devoted to contract-compliance activities. The leadership must come from the top i.e. permanent ICANN committee created by Board vested with authority to develop strategic priorities and the resources to carry out priorities. CEO must be active participant. Senior Staff performance evaluations must be tied to organization's effectiveness in delivering WHOIS outcomes in terms of enforcement procedures.</p> <p><a href="#">INTA</a>: Supports. Any suggestion that its purpose be limited to initial functions of technical stability and interoperability ignores the widespread use of, and need for WHOIS data advanced goals of transparency and accountability in Internet commerce. Also use by law enforcement and trademark community for intellectual property enforcement purposes, including: 1) identifying cybersquatters; 2) investigating those conducting piracy, product counterfeiting, phishing etc; 3) preventing or limiting damage to online fraud victims; 4) assisting law enforcement.</p> <p><a href="#">ISPCP</a>: Should help ensure appropriate attention is given and continual progress is made. Supports additional detail.</p> <p><a href="#">gTLD RySG</a>: Overkill to have CEO engaged, not clear that Board should be involved e.g sufficient for CEO and Board to have oversight. Committee's responsibility seems reasonable but membership could be made up of community with staff support. Staff should do what directed to do without extra incentives. Making staff bonuses contingent on policy development support could undermine bottom-up and inappropriate for staff to try to influence policy beyond role of providing admin. support.</p> <p><a href="#">BC</a>: Endorses and agrees that this requires executive level commitment from CEO who should ensure necessary sources and commitment. ICANN Board's Risk Committee and SSAC should be asked to provide oversight and guidance to the executive team member responsible for WHOIS.</p>
<p><b>Recommendation 2 - Single WHOIS Policy</b></p>	<p><a href="#">DyN</a>: Unclear how this rec. might be practically achieved given independence of ccTLD operators.</p> <p><a href="#">IHG</a>: Agrees. Contained in a single document, consistently articulated worldwide, referenced in all agreements with contracted parties and aggressively enforced. Compliance should be compulsory and included in RAA. Noncompliance should be met with enforcement mechanism, including monetary fines. Registrations should be suspended until data meets reporting requirements.</p> <p><a href="#">INTA</a>: Supports this and looks forward to working with ICANN in the articulation and publication policy which will ensure DNS integrity and improve online experience. Concur that current implementation does not help build consumer trust. Adoption of unified policy and mechanisms is likely to increase consumer confidence. Articulating and consolidating WHOIS should not come at the expense of allowing a reduction in ICANN's commitment to WHOIS.</p> <p><a href="#">BC</a>: Supports. Per the AoC and initial White Paper, ICANN must implement measures to maintain timely, unrestricted and public access to accurate and complete WHOIS information, including registrant, technical, billing and administrative contact information.</p>
<p><b>Recommendation 3 - Outreach</b></p>	<p><a href="#">INTA</a>: Idem as in rec. 2.</p> <p><a href="#">BC</a>: Supports. Standard notices posted on ICANN website to inform registrants and users. Provide clearly worded notification of requirements as well as penalties, and a definition of proxy/privacy services. Applicable parties should be required to maintain this information available.</p>
<p><b>Recommendation 4 - Compliance</b></p>	<p><a href="#">DyN</a>: Good idea, if perhaps difficult to test.</p> <p><a href="#">INTA</a>: Endorses and applauds call for commitment to and urgent implementation reform in light of gTLD launch. Creating a role for enforcement should increase uniformity of policy compliance enforcement and response. Institutionalizing necessary tools to allow funding and staffing will allow role to function without interference and convey message that policy enforcement operates independently. Mechanism should be created to allow public access to compliance, similar to data reporting site. Proposes that ICANN require registries and registrars to provide interfaces for complaints and that reports be automatically entered into Internic system to enable tracking. Urges ICANN to establish a process and timeline for reporting as part of metrics and incentives.</p> <p><a href="#">SW</a>: To ensure independence, sub-committee should not include CEO. Rec. is critical to future success</p>

	<p>of compliance function. Implement as soon as possible. Head of compliance should be internationally recognized regulatory expert. ICANN should conduct global executive search.</p> <p><a href="#">ISPCP</a>: Supports. Compliance remains an area of concern. Whilst appreciating difficulties, ICANN’s ability questioned. Publishing annual reports and conducting activity independent of other interests is first step in reassuring community that ICANN can stand up to role. Real test will come with gTLD. ICANN must adapt.</p> <p><a href="#">gTLD RySG</a>: Agrees there should be full transparency regarding compliance resourcing and structure. Not support ICANN Board that micromanages operational functions. It should have clear oversight responsibility to ensure strategic directives are followed and should delegate operational tasks to staff accountable to Board.</p> <p><a href="#">BC</a>: Supports.</p> <p><a href="#">APTLD</a>: Ever since new CFO, financial reports more detailed.</p>
<p><b>Recommendations 5-9 – Data Accuracy</b></p>	<p><a href="#">IHG</a>: Agrees. ICANN should require that registrars confirm data and ensure that requirements are widely and pro-actively communicated. Complete and accurate data provide consumer confidence. Problems must be resolved prior to expansion of gTLDs. ICANN must take measures to reduce the number of registrations that fall into “substantial failure” and “full failure”.</p> <p><a href="#">INTA</a>: On rec. 5 – supports and proposes: 1) a standard informational page and public campaign; 2) a set of “standard” languages; 3) a standard application template; 4) amendment of registry contracts for .com, .net and .jobs TLDs to bring a “thick” WHOIS model. On rec 6 – supports and proposes the additional goal of a further 50% reduction in the following 12 months. On rec 7 – supports and proposes that the annual report publicly report data broken by registry and registrar. On rec 8 – supports and proposes that contractual provisions require that registries annually provide and forward to ICANN for publication individual accuracy reports. On rec 9 – supports, metrics should be linked to an overall metric that shows ongoing level of accuracy across Internet. Proposes that ICANN commission an additional study, similar to NORC that can be re-commissioned every five years.</p> <p><a href="#">ISPCP</a>: Overriding concern. Lack of data accuracy has had a negative impact on operational and technical aspects. This is unacceptable and decreases consumer trust. An effective plan is overdue. ICANN must prove capable of standing up to this task and fast adoption of recs. would be viewed as positive step. Urges rapid adoption, particularly the need to ensure there is a clear, unenforceable chain of contractual agreements that demands the provision and maintenance of accurate data.</p> <p><a href="#">gTLD RySG</a>: Rec 9 – how can Board ensure that a policy is developed and still respect bottom-up model? If no community consensus, does RT expect the Board to make top-down decision? RySG has tried to contribute to development of policy recs. that address concerns of all and reflect compromises and plans to continue. It is not possible to reach consensus in a diverse community and it should not be concluded that the process failed in those cases. It is best to let market forces work rather than impose top-down regulation except when security at risk.</p> <p><a href="#">BC</a>: Supports. On rec 5 – registrants to be notified prior to registration via an email with a link that requires to view and accept terms. On rec 7 – report should be published quarterly, for at least a three-year period. This way, trends can be identified more quickly and the impacts of new policies can be more closely tracked. This can be reassessed for change to a six month reporting basis at the time of the next RT evaluation. On rec 8 – Chain must include registrants, resellers and Proxy/Privacy Service Providers responsible for access to, or accuracy of WHOIS. Without punitive measures, no incentive to provide accurate WHOIS. ICANN Compliance must take a greater role in ensuring that de-registrations take place. On rec 9, the WDRP is inefficient. An alternative policy should be developed.</p> <p><a href="#">APTLD</a>: One rec. to improve WHOIS data accuracy is to force registrants – at time of renewal – to review data on record and update necessary fields. Once done, payment can be made. This requires registrars to update systems to accommodate this additional step.</p>
<p><b>Recommendation 10 - Data Access -- Privacy and Proxy Services</b></p>	<p><a href="#">IHG</a>: Proxy services have been widely used to avoid publishing information. Concurr that ICANN must take steps to assure accuracy of information proxy administrators maintain. ICANN must initiate processes to oversee and regulate privacy and proxy service providers. They must be standardized and requirements must be contractual. The goal should be to provide clear, consistent and enforceable requirements for the operation of these services consistent with national laws, and to strike an appropriate balance between stakeholders with competing but legitimate interests.</p>

	<p><a href="#">INTA</a>: Supports. The changes are essential to provide brand owners and law enforcement with tools needed. Suggests that “objectives” be reclassified as “requirements”. Encourages ICANN to establish a single point of contact with ICANN Compliance. ICANN should set appropriate timeline for implementing guidelines (refer rec. 15).</p> <p><a href="#">ISPCP</a>: Underlines need for ensuring WHOIS data is accessible in a reliable, enforceable, and consistent fashion. ICANN should pay particular attention to this.</p> <p><a href="#">gTLD RySG</a>: This is a policy issue: PDP (GNSO process). Assumes RT’s intent is that the Board initiate a PDP. The prerequisite is the development of an issues report that defines issues that should be investigated but the rec. seems to propose a policy. It is not the RT’s responsibility to propose policy. A more appropriate rec. would be: <i>The Review Team recommends that the ICANN Board should initiate a PDP to investigate whether or not privacy and proxy service providers should be regulated and overseen by ICANN.</i> Takes no position at this time whether it should or not. Not a good idea to predispose the outcome. The accreditation system is an idea that can be explored in a PDP and even further in the implementation of any policy recs. coming from a PDP.</p> <p><a href="#">BC</a>: Supports. May be jurisdictional privacy issues. They should be handled on an exception basis. Special accreditation for Privacy/Proxy Service Providers should be developed and implemented so that Registrars are contractually bound to comply with standards. Incentives should be implemented. Only accredited Privacy/Proxy Services Providers should be allowed to register domain names using “privacy” in their name. If misused, it should result in suspension and de-registration.</p>
<p><b>Recommendation 11 - Data Access – Common Interface</b></p>	<p><a href="#">DyN</a>: No reason for ICANN to get into business of running a central WHOIS service for domains it has delegated away. People who don’t know how to use WHOIS can’t use it reliably; not a reason to create a single point of failure. Simple expedients like user education are more likely to be useful. Part of the problem stems from sticking with the obsolete protocol. Rec. proposes a way to make the protocol (and its constraints) last even longer.</p> <p><a href="#">IHG</a>: Concurs with finding that consumers struggle with locating services and interpreting data on existing “thin” WHOIS. Welcomes efforts to make interface with new gTLDs more robust and user-friendly, urges ICANN to extend improvements contemplated going forward to existing gTLDs. Encourages ICANN to take steps to optimize the Internic services for usability across all gTLDs.</p> <p><a href="#">gTLD RySG</a>: Assumes this relates to the legacy InterNIC. Site needs updating. IANA links for individual services in the root database is more useful. Internic is a centralized Whois that is pulling results from the selected registries so it returns thick results for thick registries and thin data for thin registries. RT recommends to “overhaul” the InterNIC service which deserves serious consideration. Users and consumers would appreciate a “one stop shop, from a trusted provider”. This could include thick registry data for all gTLDs using current data provided directly by registrars owners of the data and have the contractual relationship with registrants. This would require a PDP in order to require compliance or applicable contracted parties.</p> <p><a href="#">BC</a>: Supports. ICANN should be required to utilize the services of a highly-competent user design group to perform usability testing (with average consumers).</p>
<p><b>Recommendation 12-14 – Internationalized Domain Names</b></p>	<p><a href="#">INTA</a>: Supports and applauds rec. of a timeline for implementation. Calls on ICANN to designate a set of “standard” languages in which all IDN data be made available. This will “level the playing field” with regards to obligations placed on all registries/registrars and will increase ability to police accuracy and the public’s perception of the accessibility and effectiveness of WHOIS.</p> <p><a href="#">gTLD RySG</a>: On rec 12 – how would this fit into other work that is underway on multiple fronts? Essential to coordinate efforts and avoid duplication of activities. Would this be a PDP WG? Need to ensure that consensus policy recs. are enforceable. A year would not be sufficient: technical and political decisions to be made first; very unlikely that this could be complete for gTLD entry but easy enough to handle via contractual terms. Recognizes that new gTLDs will be going forward without solutions. New IDN gTLDs shouldn’t be held back - as new ASCII gTLDs go forward - since will be serving the international communities. The IDN Whois must be solved via the multi-stakeholder model, together with IETF and others. The revisions necessary to Whois protocol are not easy. No clear solutions. The processes must go forward as quickly as possible with the best communication, funding, support possible. On rec 13 – good news that work already underway in the IETF; bad news that a GNSO PDP has not been discussed yet and may be hard to charter. Supports this rec. if</p>

	<p>following interpretation is accurate: <i>to the extent that the final model, including (any) requirements for the translation of transliteration of registration data, is approved by the GNSO Council as a consensus policy rec., that data model should be incorporated in the relevant Registrar and Registry agreements within 6 months of adoption of a GNSO PDG WG's consensus policy recs. by the ICANN Board.</i> The Board's review and approval (if appropriate) should follow policy process of ICANN's Bylaws, i.e. GNSO PDP. ICANN Board should initiate a GNSO policy-making process as rapidly as possible given importance of these issues. The only way data model could be completed in the time frame is via a top-down; that would go against critical principles of Internet governance. If rec. a WG be formed not in response to a GNSO PDP, want to point out that the end result might not be as expeditious. Except in emergency case, the only way new policies can be incorporated into RAA is via consensus policy process defined in the GNSO PDP, Annex A of ICANN Bylaws. Supports anything that can be done to expedite process as long as it does not compromise established processes designed to ensure that all impacted stakeholders are represented and issues are adequately addressed. Would be faster to initiate a GNSO PDP as soon as possible than to form a separate WG and after that group finishes its work, form a GNSO PDP WG. Any experts the RT envisioned making up the special WG could participate in the PDP WG. On rec 14 – reasonable; will require completion of recs. 12 &amp; 13. <a href="#">BC</a>: On rec 12 – supports; defining standards requires special expertise and is not well-suited to a PDP. On rec 13 – supports. On rec 14 – requirements for registration data accuracy and availability in local languages should be finalized along with efforts on internalization of registration data. <a href="#">APTLD</a>: Substantial progress in recent years but development not accompanied by changes related to WHOIS data. No support from current WHOIS protocol for non-ASCII characters and the need for resolving the issue is pressing. Although effort within ICANN (joint GNSO and SSAC working groups), ICANN should prioritize this task and make more efforts. Encourages adoptions of recs.</p>
<b>Recommendation 15 - Detailed and Comprehensive Plan</b>	<p><a href="#">DyN</a>: As a result of the above, we cannot support rec. 15: we don't see how ICANN can prepare a comprehensive plan within three months, because we think the recs. are unimplementable. <a href="#">INTA</a>: Supports timeline. <a href="#">ISPCP</a>: Full endorsement. <a href="#">gTLD RySG</a>: Doubtful that this could be accomplished in 3 months even if done unilaterally by Staff. That would be completely contrary to bottom-up model. <a href="#">BC</a>: Supports.</p>
<b>Recommendation 16 – Annual Status Reports</b>	<p><a href="#">gTLD RySG</a>: Supports. Regular reporting will contribute to accountability and transparency. <a href="#">BC</a>: Supports and recommends that other related WHOIS activities be incorporated into the status report so that the report reflect current status of WHOIS and all related initiatives such as amendments to the RAA, changes to technical protocols etc.</p>

## GENERAL COMMENTS

[C-S](#): Supports recs. Implement as soon as possible.

[NCSG](#): Add a redline. Refer to NCSG's prior comments (on draft report) for this comment period. <http://forum.icann.org/lists/whois-rt-draft-final-report/msg00020.html>

[M3AAWG](#): Endorses the report. Recs within ICANN's ability to execute. Encourages ICANN to adopt and to implement recs. as quickly as possible, within the next calendar year.

[HELP](#): The report does not address the following - 1) *The IP address WHOIS databases*: a security check is run on the domain name and the IP address. Policy must be coordinated. 2) *WHOIS Banner notices*: Who is the legal authority? How can a contractor place arbitrary restrictions? 3) *Historical WHOIS being sold*: Domain Tools is selling reports and seeking a declaratory judgement in federal court following a complaint. If the case proceeds, a motion will be filed to bring in ICANN, Afiliis, Verisign, PIR, and Dept. of Commerce into the suit. 4) *Unauthorized Name servers*: Unable to remove name servers from domains (legacy settings). ICANN refuses to assist. It is impossible to search across different domains. 5) *Privacy laws*: RIPE blocking. Network Tools can no longer run IP lookups at RIPE due to EU privacy laws. They are

working on a "solution" by separating the abuse contacts from others to avoid restrictions. HELP enquired about the difference between an abuse contact and another type of ip address registration contact and why one would be covered by the EU privacy law and the other not. The complaint was automatically accused of being spam and harvesting data. The only result of the blocking is to block legitimate users access to security information. Now RIPE has one policy while ARIN has a different one. Whois is a world-wide issue. - Security mechanisms to stop spam are useless.

[DyN](#): Will not result in improvements. The report contains a number of errors, starts from the wrong assumptions and does not question the suitability of the model to the modern Internet. No realistic plan for action. Some issues not addressed even though raised by commenters. Generally supportive of operational recs. and applauds the emphasis on measurable outcomes in recs. 6, 7, 9, 14, and 16, even if recs. themselves are not a good idea. By not questioning assumptions, the report comes up with recs 5-10, 12-14, and 16; none seems to be actionable: 1. Desires of the communities are inconsistent with one another; 2. Technology to access WHOIS is inadequate. The report hints at these problems without facing them. It says that all laws need to apply as though appealing to national laws (themselves not consistent across jurisdictions) will square this circle. It doesn't engage with (2) and makes no recs. It would be stronger if it admitted that the current technical environment cannot address all conflicting demands. It could lay out the arguments, offering ICANN scope in which to make policy trade-offs. This could inform the development of technical mechanisms that could reduce some of the conflicts. Without this, the report is doomed to be "studies". WHOIS is a mess because of a needs assessment problem. Assumptions need to be discarded. It does nothing towards that. It provides an outline of the failings and is helpful because it collects statements about desired use cases and operational realities. It is not a good basis for ICANN action, for it starts from the premise that the WHOIS system we have can be fixed to solve the problems. It cannot i.e. need a protocol that offers policy alternatives, free of the baggage of the existing service model.

[IHG](#): applauds the work and quality. Report accurately assesses the current flaws in operations. Urges implementation and appreciates that comments are referenced. An effective and sustainable DNS must include a procedure for regular review, publication and assessment of implementation efforts, and ongoing analyses that lead to corrections and adjustments as the effort goes forward.

[INTA](#): Pleased that includes INTA initiatives. Supports. Implementing recs. would advance ICANN's core principles of accountability and transparency which cannot be functioning without robust WHOIS protocol. Commends ICANN for recognizing the continuing issues and its attempts to address them, including enhancement of compliance team and current efforts to develop WHOIS data validation or verification procedures. Strongly supports development of a consistent and well-defined policy detailing the requirements for privacy and proxy services and reiterates support for an accreditation system for those services. Supports recs. providing for standardized relay, reveal mechanisms and timeframes and a mix of incentives and sanctions to encourage compliance.

[JCG](#): Drug-dealing website comment.

[ISPCP](#): Detail has strengthened the recs. Recognizes the tension referred to between the constituencies and appreciates recognition that no coordinated effort to achieve consensus on difficult issues. While supporting establishment of a regular WHOIS review, ISPCP considers that failure to tackle this issue would represent failure for ICANN as it relates to the AoC. Urgent action needed. Thanks for careful deliberation and hard work.

[SW](#): The report is a serious indictment of the ICANN leadership. ICANN is a regulator. The report paints failures in: policy development, policy enforcement, management and corporate governance. The Board should read this report and those responsible for bringing the corporation into disrepute should be held accountable. ICANN's structure and management is broken. It has failed to recognize the critical function of its compliance department. ICANN's self-denial of its regulatory role appears to have resulted in its contract compliance function operating within the legal department, under-resourced and mismanaged. Over the years the community has been provided with a distorted view of compliance's budgets. Without a true view of funding and resourcing arrangements, not possible to evaluate performance. Accounting department needs to be reviewed? It took the review team 18 months to find out that compliance reports to General Counsel. ICANN's management fails to grasp public interest mandate. Regulators are founded by the industry they seek to regulate or derive income from, but they go out of their way to have adequate

arrangements to manage conflict of interest. Viewing Maguy Serad's credentials, flawed hiring process? Should Human Resources be reviewed? CEO made misleading statement with regards to staff numbers. The credibility and integrity of those who misstate facts or overstate qualifications are subject to public scrutiny and should be held accountable. ICANN has failed to meet its commitment to promote competition, consumer trust and consumer choice. Urgent repair needed.

[gTLD RySG](#): Thanks Team, especially Kathy Kleiman. Constructive recs. but targeted timeframes and details do not respect complexity of the issues, diversity of the community, and bottom-up process.

[BC](#): Thanks the Team, Staff and endorses recs.

[Knj](#): Supports recs. ICANN is not enforcing other areas of the contract currently enforceable. Provided detailed case studies which demonstrate that Registrars are violating the RAA, yet have escaped sanction for unexplained reasons. Unenforced contract is not a real contract and cannot be taken seriously. At a turning point, either the RAA means everything or nothing. If report is simply filed and ignored, transparency and accountability are vapor.

[TLDH/M+M](#): Registry Stakeholder Group allows new gTLD applicants observer status but does not permit them. We concur with statement.

[APTLD](#): Appreciates the hard work. Strongly encourages ICANN to be as inclusive of all stakeholders as possible in the future. ICANN should ensure that compliance is managed in accordance with the best practice principles, including keeping more transparency by publishing progress reports regularly. It should increase priority on improving WHOIS data accuracy and provide clearer rules and coordination on WHOIS policy development. A chain of contractual agreements helpful to require the provision and maintenance of accurate data. Data "validation" or "verification" would be one way to improve data accuracy. ccTLDs have good experience in this regard. Concerned that Data Protection or Privacy Laws in some countries might prevent applying standards. Registrars may want to act coherently among all TLDs. This should depend on laws/regulations of each country. Active cross SO analysis and discussion may make issues clearly and easier to be more practical.

[ALAC](#): Applauds Team and endorses report. Accuracy is mandatory. Highlights the following strategic positions: 1) strategic priority; 2) single WHOIS policy; 3) assign value to finding of widespread interest/convergence of WHOIS matters in the global internet community with rec. for an active and far-reaching outreach activity; 3) connect improved compliance with greater operational transparency and a more accountable Board by rec. a direct reporting between compliance sand Board; 4) in favor of an enforceable chain of agreements; 5) ICANN to embrace the utility of privacy and proxy services in the WHOIS chain and act with urgency to formalize them. Aggressive timeline, yet practical. Effective Board action needed as well as swift and effective action needed to address contentious WHOIS issues not in this report, including WHOIS privacy.

## Comments on Chapters

[DyN](#): Errors: Section B, chapter 1 - definition of "domain name": either oversimplification, or a complete misunderstanding of the DNS; inappropriate from a community that is supposed to oversee the co-ordination of the DNS. Chapter 5 - mistake of suggesting that domain names are "in a language". It is not clear enough that the character encoding problems in WHOIS are a signalling problem, and not a limitation of the protocol's data format. Protocol has never been internationalized. The report is not careful about whether data can be registered using character encodings other than ASCII i.e. while repositories could accept internationalized data without trouble today. If we stopped caring about WHOIS tomorrow, there would be no technical barrier to complete internationalization of contact data. It is critical to distinguish simple protocol problems from the broader operational questions. It also fails to discuss IRIS. Footnote 36 refers to RFC 3707 i.e. the CRISP requirements. CRISP was the IETF Working Group that produced IRIS. IRIS can support any characters that Unicode can provide and offers a data model that aligns broadly with all major DNS registration protocols. IRIS has been almost totally undeployed. This should have been explored by the report. Section A, chapter 3: recounting of the history is troubling. The text leaves out one author of RFC 812, and claims the IETF

published the specification four years before came into existence. WHOIS has long since outlived its usable life. Report refuses to face consequences. RFC 812 was published more than a year before the very first RFC defining the DNS and prior to official ARPANET cutover to TCP/IP. While WHOIS protocol has been updated over time, today's assumptions reflect limitations of earliest protocol: data available to anyone who can issue a query, no controls needed. These assumptions were reasonable on a network inhabited by friendly colleagues. None is reasonable today. Need to decide what assumptions would be reasonable.

[gTLD RySG](#): Chapter 1 & 8 - p 5 - Concur with the hope that the report "will inform... [...] decision making"; the Team's work will do that. P 6 – "Neither...[...] may never be taken': no individual has been charged with whois responsibility but notes that GNSO responsible for whois policy development for gTLDs. Not clear that charging an individual would make a difference due to diverging view points. Questions suggestion that only "small steps" are required. Supports suggestion that coordinating effort might be beneficial. P 81 – This assertion is wrong. Very few evidence supported by anything more than anecdotal evidence. Whois studies provide an opportunity to substantiate or refute some of these opinions and the results will help community move forward because of availability of objective data. Welcomes a more joined approach and hopes that study results will contribute to that. Commits to cooperate.

[KnJ](#): P 79 - RAA 3.7.8 is worded in such a way that WHOIS inaccuracy is in fact NOT enforceable. This has been suspected for some time, yet ICANN has not acknowledged the problem officially. Without ability to enforce against inaccuracies, requirements for accuracy are in fact pointless. First step is for ICANN to formally confirm that RAA 3.7.8 is not enforceable on WHOIS accuracy. Once confirmed, let us set about to correct this mistake.