



APR 16 2018

Mr. Cherine Chalaby
Chair, ICANN Board of Directors
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536, USA

Dear Chairman Chalaby:

NTIA continues to be strong supporter of the multistakeholder approach to Internet governance. As the U.S. Government's representative to ICANN's Governmental Advisory Committee (GAC), we actively engage in debates and discussions to meet our shared objective of preserving the stability and security of the Internet's domain name system. With that in mind, I am writing to request that ICANN look into two issues related to ICANN accredited registrars.

First, the actions taken by GoDaddy last month to throttle Port 43 access and to mask the information in certain WHOIS fields are of grave concern for NTIA given the U.S. Government's interest in maintaining a WHOIS service that is quickly accessible for legitimate purposes. NTIA is concerned that GoDaddy's approach of throttling access and masking information will be replicated by other registrars and registries, compounding the problems these actions create.

While NTIA is sympathetic to the need to protect customers from bad actors and malicious activity, we think that the actions taken by GoDaddy are inconsistent with the multistakeholder approach of ICANN and potentially conflict with ICANN's Registrar Accreditation Agreement.¹ NTIA encourages you to investigate the actions of GoDaddy as a contractual compliance matter, but also consider an ICANN cross-community discussion on the issue. Such conversation could result in a solution that addresses GoDaddy concerns, while still meeting the needs of the legitimate users of Port 43.

Second, in the current configuration of the DNS marketplace, an ICANN accredited registrar is the single entry point for making modifications to domain name resource records. With the growing sophistication of domain names registrants and third party content delivery networks seeking to offer enhanced security features, including deploying DNSSEC, NTIA sees merit in examining the roles other parties could play. One example is the feasibility and impact of allowing non-ICANN accredited registrars to offer services that manage specific DNS resource records, such as MX or NS records, directly with a registry. NTIA encourages the ICANN Board to request the Security Stability Advisory Committee explore the matter.

¹ See: Section 3.3 Public Access to Data on Registered Names, at <https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en#raa>.

Thank you for your consideration of these issues. Please feel free to contact Fiona Alexander, Associate Administrator for NTIA's Office of International Affairs, at (202) 482 - 1866 if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Redl", with a stylized flourish at the end.

David J. Redl

Cc: Göran Marby, CEO and President, ICANN