

1201 New York Ave., NW
Washington, DC 20005
(202) 289-3120
(202) 289-3185 fax
www.ahla.com

June 22, 2006

Vinton G. Cerf
Chairman
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way
Suite 330
Marina del Rey, CA 90292-6601

Dear Mr. Chairman,

We are writing to express our serious concerns about a resolution adopted on April 12 by ICANN's Generic Names Supporting Organization (GNSO) to define the "purpose of Whois" as only to "resolve issues related to the configuration of records associated with the domain name within a DNS nameserver."

Those of us in the travel and hospitality industries depend on ready access to Whois data to enhance accountability and transparency online, and we believe such a policy change will have a seriously detrimental effect on our consumer protection efforts both in the U.S. and abroad.

Travel and hospitality companies use Whois in several ways: 1) to identify parties responsible for registration of misleading domain names, which are often the source of online frauds or phishing schemes; 2) to prevent or investigate misconduct facilitated by misleading registrations; 3) to cooperate with law enforcement to protect consumers in cases of fraudulent websites; and 4) to protect our legitimate intellectual property rights.

If the "purpose of Whois" is defined narrowly as proposed by GNSO, most of the data now in Whois would be cut off from public access - including data as fundamental as the name of the domain name registrant. If the change were to be implemented in new ICANN rules, most of the current public and business uses of Whois would become virtually impossible.

Consumer protection is the primary concern in Internet commerce. Our businesses need access to the Whois database to protect the privacy and security of our customers and to reduce the risk of online fraud, including identity theft. Internet users would lose significant privacy protections under the narrowly defined "purpose of Whois."

For example, cases of fraud or trademark infringement would not be considered "technical issues." Since time is of the essence in addressing these cases, we must be able to respond as quickly as possible. The current long-standing rules on access to Whois are the

best way to fulfill this important consumer protection need and they should be maintained.

We, therefore, strongly urge ICANN to reconsider the GNSO Council's April 12 resolution. We recommend that you preserve and enhance access to Whois data for purposes of protecting consumers and fighting fraud. We hope that ICANN will work to further enhance the accuracy of the Whois database. There is a tremendous public interest value in a rich Whois data set with information on registrants and administrative contacts.

We thank you for this opportunity to express our concerns, and we would be happy to assist you in every way possible to address these issues.

Sincerely,

Geoff Ballotti
President, North America Division
Starwood Hotels & Resorts Worldwide, Inc

Christopher L. Bennett
Executive Vice President and General Counsel Interstate Hotels & Resorts, Inc.

Lyle L. Boll
Sr. Vice President and General Counsel
Millennium Hotels and Resorts

Elisabeth Roth Escobar
Vice President & Senior Counsel, Intellectual Property Marriott International Inc.

Lynn Goodendorf
Vice President Information Privacy Protection InterContinental Hotels Group, Inc.

David Kong
President & CEO
Best Western International, Inc.

Joseph A. McInerney, CHA
President and CEO
American Hotel & Lodging Association

Scott McLester
Senior Vice President, Legal
Cendant Corporation, Inc.

Scott Normali
Senior Vice President
Distribution - Website Development & Marketing Hilton Hotels Corporation

Douglas Verner
Vice President, General Counsel & Secretary Guest Services, Inc.