

From: Daniel Barrows

Date: Tuesday, February 12, 2019 at 09:18

To: gdpr <gdpr@icann.org>

Subject: [Ext] Public Input on Whois Privacy

I'm just an ordinary internet user, who has been involved in managing the domains for a nonprofit and several unincorporated community groups in the United States. For most of these groups, I have chosen to make whois information public and not use whois privacy services, although for some I have used whois privacy services to prevent a particular participant in a small advocacy group from being targeted as a ringleader.

Some opinions:

1. I want to affirm that the owner of a domain should be public. In general, I see a website as similar to a storefront. People should be able to confront a store owner about what happens in their store, about the propriety of the signs on the windows, etc. Similarly, website owners should be easily able to be contacted about the content of their sites. An email address and a physical address are adequate for this purpose, permitting easy electronic communication and a means of sending more formal, costly communication by mail, or even directly addressing the owner in person.
2. I don't think a telephone number should be necessary. This is especially intrusive for individuals who register a website as opposed to a business. I get a dozen calls a day from scraped whois information. That's obviously a pain. Apart from my experience, though, telephone calls have characteristics that make them poorly suited for a public directory. They are handled in real time, vs. email and snail mail that can be handled at leisure.
3. As someone who has used whois privacy services before to protect free speech, I don't think it is overly onerous to insist that groups and individuals seeking anonymity be required to use a subdomain, eg. AdvocacyGroup.wordpress.com. This is actually a helpful cue to users that they are dealing with a less organized and official group. It also ensures that *someone* identifiable is responsible for all web content. wordpress.com, or whatever other hosts that want to facilitate free speech, can set their own parameters on what content they will allow.

Sincerely,

Daniel