

From: "Cleary, Tom"

Date: Monday, March 5, 2018 at 20:52

To: "gdpr@icann.org" <gdpr@icann.org>

Subject: [Ext] Feedback on GDPR compliance model draft...

Dear ICANN,

I am a security professional from Perth, Western Australia.

I use WHOIS information frequently (at least daily, often numerous times per day...)

Without access to the ACTUAL data in use on the Internet, I will be unable to perform my role (I currently work for the Western Australia Government developing an Incident Response framework, and progressing Cyber Security Incident Response activities....)

I've worked alongside Police for a number of years and have been the first responder for several significant prosecutions and given evidence at trial.

If I can't trace an offender immediately, it is increasingly less likely that our Police (who are always stretched to respond to the tsunami of reports they take...) will be able to take care of the "Cyber hygiene" matters that I can effectively remove from their work mix.

I understand that consideration for removing unfettered WHOIS from the offender community has some attractions, but this proposal would hamper, not benefit, investigative capability.

And making this change on a Global basis, based on a single legislative change from a particular area causes me concern.

Sadly, although this might sound like a good idea, it will cause harm.

Instead, consideration of a mechanism to enable restriction based on authorised status that includes people who have a formal professional track record might help.

However, that should also be considered long and hard, because it is likely that deleterious side effects may be found.

Regards,

tom.