



January 29, 2018

Mr. Cherine Chalaby
Chairman of the Board
ICANN

Mr. Goran Marby
CEO
ICANN

Dear Messrs. Chalaby and Marby:

We write to you on behalf of The Federación de Gremios de Editores de España (FGEE) (Spanish Association of Publishers Guilds) is a non-profit, private professional association created in 1978 to represent, manage, enhance and defend the general common interests of the Spanish publishers on a national, European and international level. At the same time it is an export association, recognised as such by the Spanish Treasury Ministry. Its represents the 93% of the national production and the 97% of the commerce of editorials works.

We write to you about our concerns about the threat to the continued availability of the WHOIS / domain registrant database. As you know, there is an overriding public interest in ensuring the continued availability and transparency of this data, as evidenced in communications to ICANN from the governmental advisory committee, law enforcement, IP and security professionals, and others. In fact, the concept of an accurate and transparent domain name registrant database is an obligation in several free trade agreements, further evidencing its importance. For "The Coalition of Creators and Industries of Content" specifically, the accuracy and accessibility of the data is vital to our efforts to investigate and enforce against infringements of our creations, as well as to protect against fraud and other malfeasance involving our works or our trademarks and designs.



Given this, we strongly urge you to ensure the WHOIS / domain registrant database remains as public and transparent as possible, and that access to any non-public WHOIS data is provided expeditiously and without undue hindrance. To that end, we strongly support the comments to the three interim models submitted by the Intellectual Property Constituency, and hope you will consider those comments in developing an interim model for the WHOIS database that complies with the twin goals of being GDPR compliant and preserving as much access and transparency to WHOIS as possible.

Regards,

Antonio María Ávila
Executive Director of FGEE