

To: ICANN (Internet Corporation for Assigned Names and Numbers)
VIA Email: gdpr@icann.org, goran.marby@icann.org and accred-model@icann.org

From: Messaging, Malware and Mobile Anti-Abuse Working Group (M³AAWG)

Date: April 13, 2018

Subject: WHOIS Tiered Access and Accreditation Program: Comments from M³AAWG

Dear Mr. Göran Marby CEO, ICANN:

We agree with the Anti-Phishing Working Group's (APWG) comments dated April 5, 2018 that the anti-abuse community needs the ICANN Board to pass a Temporary Policy to make an accreditation plan a reality, directing the participation of the registry operators and registrars.

We agree that an expert group from the Anti-Abuse community including APWG, FIRST and M³AAWG should be created to facilitate the certification of qualified applicants from the security field.

We support a short-term plan discussed on the April 6th conference call offering tiered WHOIS access to authorized IP addresses until a more sophisticated mechanism can be a further developed with details for accredited access.

Sincerely,

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