To: Mr. Cherine Chalaby, Chairman of the Board, ICANN
Mr. Goran Marby, CEO, ICANN

From: National Music Council of the United States

Re: WHOIS Domain Registrant Database

The members of the National Music Council together represent some one million individuals from all facets of the music community including songwriters, recording artists, music publishers, record labels, studio professionals, music educators, and performing rights societies around the world. These Council members represent the people that create, manufacture, own, distribute and/or license much of the world’s music that is developed, displayed, distributed, streamed and experienced over the Internet.

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 this coalition, 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.

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.