



Academy of Country Music
American Academy of Teachers of Singing
American Composers Forum
American Federation of Musicians
American Guild of Musical Artists
American Guild of Organists
American Harp Society
American Orff-Schulwerk Association
Artists Against Hunger & Poverty
ASCAP
BMI
Chopin Foundation of the United States
Conductors' Guild
Country Music Association
Delta Omicron International Music Fraternity
Early Music America
Interlochen Center for the Arts
International Federation of Festival
Organizations
International Music Products Association
(NAMM)
Mu Phi Epsilon International Music Fraternity
Music Critics Association of North America
Music Performance Fund
Music Publishers Association of the United
States
Music Teachers National Association
National Academy of Popular Music
National Academy of Recording Arts & Sciences
National Association for Music Education
National Association of Negro Musicians
National Association of Teachers of Singing
National Federation of Music Clubs
National Federation of High School Associations
National Flute Association
National Guild for Community Arts Education
National Guild of Piano Teachers/
American College of Musicians
National Music Publishers' Association
National Opera Association
New Music USA
Recording Industry Association of America
SESAC
Sigma Alpha Iota International Music Fraternity
The Songwriters Guild of America

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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.