

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 SGAE, Sociedad General de Autores y Editores, Sociedad General de Autores y Editores (General Society of Authors and Publishers) is a private entity and a collective society devoted to the defence and collective management of the intellectual property rights of our over 100,000 members. It has been operating since 1899 and the repertoire administered today by the SGAE exceeds ten million musical, dramatic, choreographic and audio-visual works. Its activities, focused on protecting and distributing the remuneration of our members for the commercial use of their works, not only benefits our members but contributes to the protection of the extremely rich cultural heritage represented by our repertoire.

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,

