

**From:** Matthew Zook  
**Date:** Monday, January 29, 2018 at 18:14  
**To:** "gdpr@icann.org"  
**Subject:** [Ext] GDPR comment

To Whom It May Concern:

I am the president and founder of ZookNIC, which provides critical data and analysis to all parts of the domain name industry -- registries, registrars, registrants and analysts. I am drafting this email in response to requests for comment to the three proposed models for collection domain name registration data.

I am in strong support for Model 1 that allows for thick registration data, particular variables such as country, city and postal code, that protect privacy while preserving the ability to make scientific studies of the internet and information society.

This level of data is absolutely essential for gathering data required for determining geographic patterns of domain name uses. This allows for a direct comparison of domain name markets (see Oxford Internet Institute, 2014; Zook, 2000b). Moreover, domain name use by country has been an important metric for studying the information and knowledge economies (see Ojanperä *et al*, 2017; Graham *et al*, 2015; Zook, 2001; Zook 2000a).

ZookNIC actively contributes to academic and non-profit research that uses domain name counts, domain name geographies and related metrics to study the information and knowledge economies. Examples include the 2017 [GII Innovation Index](http://globalinnovationindex.org)[[globalinnovationindex.org](http://globalinnovationindex.org)], [WSIS reports](http://itu.int)[[itu.int](http://itu.int)] and ongoing work with researchers at the Oxford Internet Institute (see list of scientific publications to at end).

Without thick registration data (as in Model 1), the world would lose a

valuable metric for studying the information society.

Sincerely,

Matthew Zook  
ZookNIC, President

## **Bibliography**

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