



Confidence Inspired™

July 6, 2006

Paul Twomey  
President & CEO  
ICANN  
4676 Admiralty Way, Suite 330  
Marina del Rey, CA 90292

Dear Paul:

I am writing to express RSA Security's concerns with some of the proposals contained in the recent Preliminary Task Force Report on the Purpose of WHOIS and of the WHOIS database.

We understand that, to protect the privacy of domain name holders, the Task Force is considering restrictions on the amount of contact information provided in the WHOIS database. We acknowledge the importance of protecting privacy, but we believe that it should be properly balanced with other important considerations.

As you may be aware, RSA Security operates an anti-fraud and anti-phishing service, which is utilized by a growing network of the largest consumer-facing financial institutions and ISPs in the world. This service is dependent on the WHOIS database to determine appropriate contacts, in order to shut down fraudulent and brand-infringing websites. This service is extremely time-sensitive: with every passing hour during which a phishing website has not been taken down, our customers (and in turn their customers) suffer proven, direct and substantial financial harm. Without accurate and usable contact information, organizations that are combating online fraud and cyber crime would have to resort to legal action, a lengthy process that would create unprecedented windows of opportunity for fraudsters. We share the concerns expressed by the Federal Trade Commission and other security-conscious stakeholders, that this move would facilitate the perpetration of online fraud and crime.

From our experience, contact information in the WHOIS database is often inaccurate, not up to date, or simply false and fraudulent. There is actually a critical need to ensure greater accuracy and usability of this information, rather than restrict it. We believe that this may constitute the basis for a possible compromise between the supporters of Formulations 1 and 2 of WHOIS' purpose: protect the privacy of domain name holders while ensuring that the contact information they do provide is accurate and usable in

urgent situations, and that the ability to rapidly take down a presumably fraudulent website is not only preserved, but enhanced.

Paul, we look forward to supporting ICANN's efforts towards a workable solution.

Sincerely yours,

A handwritten signature in grey ink that reads "Shannon L. Kellogg". The signature is written in a cursive style with a large, stylized "S" at the beginning.

Shannon L. Kellogg  
Director of Government & Industry Affairs  
RSA Security Inc.