



Association Française pour le Nommage Internet en Coopération
chargée de la gestion des noms de domaine en *.fr* et *.re*

Draft FY12 Operating Plan and Budget

AFNIC is the registry for the Internet domain names *.fr* (France) and *.re* (Reunion Island).

AFNIC (French Network Information Center), is a not-for-profit organization. It was created jointly in December 1997 by [INRIA](#) (The French National Institute for Research in Computer Science and Control) and the French Government.

AFNIC is an open, multistakeholder, inclusive membership organisation gathering public and private Internet players: users (legal entities and individuals), domain name registrars (Internet services providers), international entities and representatives of government.

AFNIC is a founding member of CENTR, the European organisation of country-code top level domain.

Afnic welcomes the opportunity to comment on the proposed changes for *.CAT* Whois.

AFNIC fully supports these proposed changes, which would demonstrate ICANN's commitment to taking into account local laws, and represent a significant step forward in the directions set by the Affirmation of Commitments.

1. Benefits of the proposed changes

As described in AFNIC's contribution to the Whois Review Team discussion paper, AFNIC has implemented a Whois policy which is similar in many ways to the proposed policy for *.CAT*.

The highlights of this policy are :

- Private registrants' data is not displayed in the public Whois ;
- AFNIC provides on line web forms to enable any interested party to send electronic messages to the domain name admin contact without disclosing its coordinates⁴ ;
- Right owners or affected parties may request disclosure of registrant datas. Such requests are handled by AFNIC. AFNIC checks whether the affected party has some form of right over the domain name before disclosing.

While the *.fr* domain count was approaching 2 millions, in 2010 AFNIC handled 412 data disclosure requests, of which 356 were granted.

Our current assessment of the policy is that it reinforces trust from private registrants into the domain name industry players (AFNIC as registry but also registrars), since they can provide accurate data with limited risk of unsolicited communications.

While we do not have specific measurements (because *.fr* was not available to private registrants before this policy was set up), customer relations suggests that this policy has a positive impact on data accuracy.

2. Compliance with European Laws

The AFNIC policy was set up following specific instructions for the French National Authority for Data Protection (CNIL). According to this experience, and while some slight differences between France and Spain may exist, it is clear to us that these changes are necessary to comply by European Laws.

3. Benefits for Law Enforcement Agencies

As mentioned above, the proposed changes should have a positive impact on data accuracy. It should be stressed that the .CAT registry also commits to providing full access to registrant data to Law Enforcement Agencies. Therefore, data protection does not create opportunities for misusing the domain names in any way.

We believe this system to be a significant improvement. It has the potential to fulfill two key objectives of the Affirmation of Commitments (and the Whois Review) : improving data accuracy and facilitating queries from Law Enforcement Agencies.