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July 7, 2015

We host more than 70 million websites on WordPress.com. We pride ourselves on providing a safe and secure platform for our users to express their views, publish news, or operate a business. We're writing today to strongly oppose the Initial Report on the Privacy & Proxy Services Accreditation Issues. By requiring all commercial website owners to divulge their personal information, such as their home address, the proposal would significantly harm communication, commerce, and most especially, anonymous speech online.

Our mission at Automattic (the company behind WordPress.com) is to democratize publishing, and an important piece of that work is protecting the privacy and anonymity of our millions of users. Despite what proponents of this proposal might suggest, privacy and anonymity are not crimes, rather, they are often essential components for robust, truthful speech and journalism online. Whether they're expressing unpopular views about their government, exposing corporate malfeasance, sharing painful stories of abuse, or connecting with other marginalized people, many of our users care deeply about their privacy and choose to publish anonymously.

We respect this choice and believe that online services have an obligation to require due legal process before releasing private data. Moreover, those whose data is requested should have the right to defend their privacy in court. Our efforts to protect our users' privacy include:

- Publishing legal guidelines, explaining how we respond to demands for user data. (See: <http://transparency.automattic.com/legal-guidelines/>)
- Informing users when their data has been requested, unless legally prohibited from doing so, and giving them time to object to the request.
- Regularly publishing a transparency report that provides useful data about how many times governments asked us for user data and how often we provided user data in response. (See: <http://transparency.automattic.com/information-requests/>)

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- Engaging in advocacy to oppose mass surveillance and compelled “backdoor” security weaknesses.
- Standing with our users to challenge improper legal process and government requests for their personal information or identities.

We work hard to design and implement our privacy protections because we have seen firsthand how requests for user information can be abused and used as a means to silence anonymous speakers. For example, we have seen corporations seek to unmask the identity of anonymous whistleblowers, who published inside accounts of corruption or mismanagement. In many of these cases, our users were able to rely on a number of existing legal protections for anonymous speech, and when courts examined the facts of each case, they often determined that there was no basis in law for revealing the anonymous blogger’s identity. These courts recognize the value of anonymous speech and are careful to ensure that user information is furnished only in appropriate circumstances, such as when an anonymous user may be breaking the law.

Unfortunately, if ICANN adopts the current proposal, all of the privacy protections we and our users rely on would be for naught; easily circumvented by a simple WHOIS search that could reveal a user’s name, address, and other personal information without even minimal legal process to justify that the information is relevant or necessary to a lawsuit or investigation.

We strongly oppose any proposal (such as the one currently before ICANN) that would relax or eliminate the important legal protections for privacy that are in place. Doing so would create an easy and obvious avenue for abuse, make many forms of anonymous publishing impossible, and almost certainly lead to the chilling of legitimate speech - not to mention outright harassment of website owners.

For these reasons, we ask ICANN to reject the current proposal to limit privacy-protecting domain registration services.

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