



**Etienne Sanz de Acedo**  
*Chief Executive Officer*

655 Third Avenue, 10th Floor, New York, NY 10017-5646, USA

t: +1-212-642-1776 | f: +1-212-768-7796

inta.org | esanzdeacedo@inta.org

Submitted via email: comments-rdds-output-03dec15@icann.org

March 18, 2016

Ms. Krista Papac  
Director, Registry Services and Engagement  
ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094

RE: Proposed Implementation of GNSO Thick Whois Consensus Policy Requiring  
Consistent Labeling and Display of RDDS (Whois) Output for all gTLDs

Dear Ms. Papac:

The International Trademark Association (INTA) appreciates this opportunity to provide comments to the Internet Corporation for Assigned Names and Numbers (ICANN) on the above referenced proposal published for public comment on December 3, 2015.

INTA strongly supports the requirement that all gTLD registries provide a thick Registration Data Directory Service (RDDS). However, we are concerned about the uncertain implementation timeline for existing registries .com, .net and .jobs (Phase 3), especially given how long this requirement has been under consideration by ICANN. The Committee looks forward to seeing the staff report and next steps in this Policy Development Process (PDP).

As INTA has stated in previous comments, there are several important advantages to requiring all registries to utilize a Thick Whois model:

- A Thick Whois facilitates the resolution of disputes related to the registration and use of domain names.
- Simplifying access to domain name registration data through a Thick Whois will help prevent abuses of intellectual property and will protect the public in many ways, including the reduction of consumer confusion and consumer fraud in the Internet marketplace.
- A Thick Whois enables quicker response and resolution by law enforcement and other stakeholders when domain names are used for illegal, fraudulent or malicious purposes
- In contrast to a Thick Whois, all contact data associated with a particular domain name registration in a Thin Whois directory is decentralized and held by the registrar sponsoring that registration. Public access to this data is vulnerable to registrar technical failure, insolvency, or simply non-compliance with its contractual obligations regarding Whois data.
- More user-friendly consumer and public access to registration information by avoiding the need to find and search Whois databases across hundreds of registrars.

In a presentation on March 6, 2016, on Thick Whois Policy Implementation, ICANN suggested that implementation of Thick Whois by .com, .net and .jobs may be delayed until July 31, 2017, or later. To the extent implementation of Thick Whois does not occur for more than a year, the above benefits cannot begin to be realized by the public.

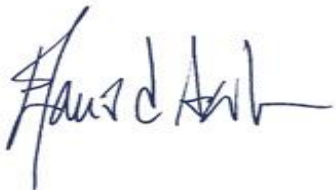
INTA supports the comments of the GNSO's Intellectual Property Constituency (IPC), and strongly urges ICANN to set a firm date for implementation of Phase 3 and choose a near-term date, rather than postponing implementation for more than a year.

#### About INTA

INTA is a 138 year-old global not for profit association with more than 5,700 member organizations from over 190 countries. One of INTA's goals is the promotion and protection of trademarks as a primary means for consumers to make informed choices regarding the products and services they purchase. During the last decade, INTA has also been the leading voice of trademark owners within the Internet community, serving as a founding member of the IPC. INTA's Internet Committee is a group of over 200 trademark owners and professionals from around the world charged with evaluating treaties, laws, regulations and procedures relating to domain name assignment, use of trademarks on the Internet, and unfair competition on the Internet, whose mission is to advance the balanced protection of trademarks on the Internet.

Should you have any questions about our comments, I invite you to contact Lori Schulman, INTA's Senior Director of Internet Policy at 202-261-6588 or at [lschulman@inta.org](mailto:lschulman@inta.org).

Sincerely,

A handwritten signature in dark ink, appearing to read "Etienne Sanz de Acedo". The signature is fluid and cursive, with a long horizontal stroke at the end.

Etienne Sanz de Acedo  
Chief Executive Officer