The International Anti-Counterfeiting Coalition (IACC) provides these reply comments on the “Thick Whois Policy Development Process (PDP) Recommendations for Board Consideration.” The members of the IACC support the conclusions contained in the Thick Whois PDP Working Group Final Report[[1]](#footnote-1), which were unanimously adopted by the Generic Names Supporting Organization (GNSO) Council[[2]](#footnote-2) at its meeting on October 31, 2013.

The IACC encourages the swift transition from thin to thick Whois, as the PDP Working Group Final Report identified that the transition presents no significant implementation burdens, nor has existing legal research identified any privacy or data protection issues related to ‘thin’ or ‘thick’ Whois. Specifically we note that the transition will not be cost burdensome, nor will there be any effect on issues that were previously of concern to the IACC, such as third-party Whois provider accessibility of Whois data.

The IACC acknowledges the GNSO Council’s request for additional legal research on privacy and data requirements presented by the transition process itself, but encourages the GNSO Implementation Review Team to monitor the process alongside the transition, rather than delay implementation pending the review on these issues.

The Board should pass the recommendations of the Thick Whois Policy Development Process (PDP) Working Group, and the GNSO Council.

Respectfully submitted,

Travis D. Johnson

Vice President – Legislative Affairs & Policy

The International AntiCounterfeiting Coalition

1. Final Report on the Thick Whois Policy Development Process, October 21, 2013 at <http://gnso.icann.org/en/issues/whois/thick-final-21oct13-en.pdf>. [↑](#footnote-ref-1)
2. GNSO Council Resolution 20131031-1, October 31, 2013, at <http://gnso.icann.org/en/council/resolutions#201310>. [↑](#footnote-ref-2)