

## **USG Comments on the “WHOIS Accuracy Pilot Study Report”**

The United States Government (USG) supports ICANN’s efforts to develop an Accuracy Reporting System (ARS) in accordance with efforts of the WHOIS Review Team and the 2013 Registry Accreditation Agreement (RAA). We appreciate this opportunity to review and comment on ICANN’s WHOIS Accuracy Pilot Study Report and offer below the coordinated view of the USG.

On the subject of sample design and methodology, the USG finds measuring operational verification of WHOIS as a key component to ensuring accuracy. As such, per the findings of the Pilot Report, we believe that Phase 2 of the ARS needs to include a more appropriate and robust sampling size (greater than 1,000) for operational validation of telephone and email to provide a true representation of the market.

The consultation specifically asks whether ICANN should conduct Identity Validation in subsequent phases of the ARS development. It is the view of the USG that evaluating WHOIS data from the identity perspective should be considered for future phases of the ARS development.

We agree with the comments of the Danish Business Authority and the GNSO’s Business Constituency, which stress the importance of Identity Validation as necessary to confirm that WHOIS information corresponds to the registrant. Like the GNSO Business Constituency, we believe that in the course of moving forward with Identity Validation, "the task and costs of acquiring Identity Validation should be quantified and shared" so that we can arrive at best practices for implementation.

The maintenance, verification, and validation of WHOIS information are an important conduit to public safety, dispute resolution, abuse reporting, and other applications of the WHOIS system. The verification of WHOIS information is critical to mitigating the harms created by registrants seeking to conduct nefarious activities, and can aid in vital communication with online service operators.

The USG thanks ICANN again for the opportunity to review and comment on the WHOIS Accuracy Reporting System. We will continue to follow and participate in this process, including within the Governmental Advisory Committee (GAC) where appropriate.