

## **GNSO gTLD Registries Stakeholder Group Statement**

Issue: WHOIS Misuse Study Draft Report

Date: 16 January 2014

Issues Report URL: <http://www.icann.org/en/news/public-comment/whois-misuse-27nov13-en.htm>

The Registry Stakeholder Group has reviewed the Whois Misuse Study Draft Report. The study findings have some limitations. First, two facts were established long ago (if nothing else through observation and practice): that information published in Whois records is misused, and, arguably, that anti harvesting techniques can alleviate some of the misuse. In addition, the research focused on only five gTLDs, .BIZ, .COM, .ORG, .INFO, and .NET. Further, the document itself suggests limitations when, for example, it mentions low response rates and the prohibitive costs of doing what is needed for a thorough study of address misuse.

The RySG believes, however, that the Draft Report's study conclusions may prove useful in future domain registration data policy development efforts. First, the findings that "there is a statistically significant occurrence of WHOIS misuse affecting Registrants' email addresses, postal addresses, and phone numbers," and that "WHOIS anti-harvesting techniques... [are] statistically significant in reducing the possibility of WHOIS email address misuse" add statistical validity to what were anecdotal beliefs.

In addition, the Draft Report suggests potential problems with seeking universal solutions to Whois information misuse. The study found clear differences by gTLD in rates of phone number misuse, with negative correlation to .ORG domains but positive matches with .BIZ and .INFO. (In other words, the cheaper the registration cost, the more likely the misuse.) In the same vein, it concluded that domain price is negatively correlated with the possibility of misuse of email addresses. The extent of email address misuse varies by gTLD, and .BIZ domains are associated with more misuse. While we recognize that price is a sensitive issue in policy development, individual registries might choose to consider it as a possible means of reducing abuse.

Finally, the finding that "experimental domain names representing natural person names appear to foster less email misuse, while for other experimental domain name categories (e.g., professional, randomly-generated, etc.), WHOIS misuse probability seems independent of the domain name composition" warrants further consideration in ICANN policy development.

As suggested, the studies have limitations. The findings should be used with caution by recognizing that more detailed study and analysis might be useful in some cases and margins of errors regarding significance levels should be taken into consideration.

## RySG Level of Support

### 1. Level of Support of Active Members: **Supermajority**

- 1.1 # of Members in Favor: 22
- 1.2 # of Members Opposed: 0
- 1.3 # of Members that Abstained: 0
- 1.4 # of Members that did not vote 4

### 2. Minority Position(s): None

### General RySG Information

- Total # of eligible Voting RySG Members<sup>1</sup>: 26
- Total # of Voting and Non-voting RySG Members: 31
- Total # of Active Voting RySG Members<sup>2</sup>: 26
- Minimum requirement for supermajority of Active Voting Members: 18
- Minimum requirement for majority of Active Voting Members: 14
- # of Members that participated in this process: 31
- Names of Members that participated in this process:
  1. Afilias, Ltd.
  2. Charleston Road Registry (non-voting member)
  3. .CLUB Domains LLC
  4. CORE (non-voting member)
  5. Donuts Inc.
  6. DotAsia Organisation
  7. dotBERLIN GmbH & Co. KG
  8. dotCooperation
  9. Dot Kiwi Ltd.
  10. Dot Latin, LLC

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<sup>1</sup> All top-level domain sponsors or registry operators that have agreements with ICANN to provide Registry Services in support of one or more gTLDs are eligible for membership upon the “effective date” set forth in the operator’s or sponsor’s agreement (Article III, Membership, ¶ 1). The RySG Articles of Operations can be found at [http://gtldregistries.org/sites/gtldregistries.org/files/Charter\\_of\\_the\\_gTLD\\_Registries\\_Stakeholder\\_Group.pdf](http://gtldregistries.org/sites/gtldregistries.org/files/Charter_of_the_gTLD_Registries_Stakeholder_Group.pdf)

<sup>2</sup> Per the RySG Articles of Operations, Article III, Membership, ¶ 4: Members shall be classified as “Active” or “Inactive”. A member shall be classified as “Active” unless it is classified as “Inactive” pursuant to the provisions of this paragraph. Members become Inactive by failing to participate in a Constituency meeting or voting process for a total of three consecutive meetings or voting processes or both, or by failing to participate in meetings or voting processes, or both, for six weeks, whichever is shorter. An Inactive member shall have all rights and duties of membership other than being counted as present or absent in the determination of a quorum. An Inactive member may resume Active status at any time by participating in a Constituency meeting or by voting.

11. DotShabaka Registry
12. dotStrategy Co.
13. Employ Media LLC
14. Fundació puntCAT
15. GMO Registry, Inc. (non-voting member)
16. ICM Registry LLC
17. Museum Domain Management Association – MuseDoma
18. Neustar, Inc.
19. Public Interest Registry - PIR
20. Punkt.wien GmbH
21. Societe Internationale de Telecommunication Aeronautiques – SITA
22. Telnic Limited
23. TLDH Limited
24. Top Level Design LLC
25. Tralliance Registry Management Company (TRMC)
26. Uniregistry Corp. (non-voting member)
27. United TLD Holdco Ltd. (non-voting member)
28. Universal Postal Union (UPU)
29. VeriSign
30. XYZ.COM LLC
31. Zodiac

- Names & email addresses for points of contact
  - Chair: Keith Drazek, [kdrazek@verisign.com](mailto:kdrazek@verisign.com)
  - Alternate Chair: Paul Diaz, [pdiaz@pir.org](mailto:pdiaz@pir.org)
  - Secretariat: Cherie Stubbs, [Cherstubbs@aol.com](mailto:Cherstubbs@aol.com)
  - RySG representative for this statement: Chuck Gomes, [cgomes@verisign.com](mailto:cgomes@verisign.com), and Don Blumenthal, [dblumenthal@pir.org](mailto:dblumenthal@pir.org)

Regarding the issue(s) noted above, the following position(s) represent(s) the views of the ICANN GNSO gTLD Registry Constituency (RySG) as indicated. Unless stated otherwise, the RySG position(s) was (were) arrived at through a combination of RySG email list discussion and RySG meetings (including teleconference meetings).