

(DRAFT) ICANN's Study on the Prevalence of Domain Names Registered using a Privacy or Proxy Service among the top 5 gTLDs

PUBLIC COMMENTS SUMMARY

(1 OCTOBER 2009 – 20 NOVEMBER 2009)

Source: The full text of the comments may be found at <http://forum.icann.org/lists/privacy-proxy-study/>

ICANN received ten comments that are categorized by the following headings below: Study, Whois, and General privacy and proxy service concerns. Comments were received from INTA, Patrick Mevzek, Na Vijayashankar, Aleecia M. McDonald, SoftCafe Staff, Richard C. Conner, Michele Neylon (Blacknight Solutions) and Andrew Rondeau. An additional comment was received from Garth Bruen (KnjOn) after the comment period had closed. Some comments contained suggestions and insights that fell outside the defined scope of this study, which was to establish a baseline of the prevalence of domain names registered using a privacy or proxy service among the top 5 gTLDs.

Summary of Comments

STUDY

- The study results are possibly inaccurate due to registrants opting to provide invalid, yet plausible details. ...*M. Neylon, Blacknight (7 Oct 2009)*.
- Using the study's stratified sample, it is not possible to see comparisons in uptake rates between domains based on the study's small data set... *McDonald, A. (19 Oct 2009)*.
- Conclusions based on only 2 percent of all domain names do not seem to be very useful, especially when four of the five sampled registries are in the USA, no comparisons are attempted with ccTLDs, and no study is made asking registrant why they choose to use a proxy service. ...*Mevzek, P. (20 Nov 2009)*.
- The study needs additional analysis at the registrar level...*McDonald, A. (19 Oct 2009)*.
- The study's classification methods challenged ...*INTA (20 Nov 2009)*.
- The study does not clearly define proxy and privacy services...*INTA (20 Nov 2009)*.
- The study does not appear to identify situations in which a domain name owner provides false Whois information to the proxy service provider or privacy service provider, creating a second level of obfuscation... *INTA (20 Nov 2009)*.

WHOIS

- Most gTLD's have fundamentally broken Whois... *M. Neylon, Blacknight (7 Oct 2009)*.
- Whois fundamental flaws..*Mevzek, P. (20 Nov 2009)*.
- Proxy services should be evaluated with Whois... *Mevzek, P. (20 Nov 2009)*.

GENERAL PRIVACY/PROXY SERVICE CONCERNS

- Lack of required registrant information questioned...*Conner, R. (10 Oct 2009)*.
- Verification of registrants' identities needed... *Nidadhavolu, V.S. (28 Oct 2009)*.

- Privacy/proxy services could shield malicious registrars...*Vijayashankar, N., Naavi.org (6 Nov 2009)*.
- As tools to conceal one's identity, proxy and privacy services can be and are used for *bona fide* and *mala fide* purposes...*INTA (20 Nov 2009)*.
- Proxy services are a tool. As any other tool it can be misused. ...*Mevzek, P. (20 Nov 2009)*.
- Proxy services violate the RAA...*INTA (20 Nov 2009)*.