



**Comments by InterContinental Hotels Group  
on the  
NORC Whois Accuracy Study  
April 15, 2010**

InterContinental Hotels Group has been advocating for this WHOIS accuracy study for a significant period of time. We are pleased with the initial findings the study has identified and are hopeful that the results will set the stage for further analysis and reforms aiding the accuracy of WHOIS data. We believe that creating a set of thresholds that will minimize and potentially prevent Domain Name abuse in the pretext of launching the new gTLDs is an important objective for ICANN. Based on our initial analysis of the NORC study we would like to highlight four specific points and recommendations:

First, the study confirms that the problem of inaccurate Whois data exists at a significant level. Almost 30% of the sample of 1500 registrations in the 5 largest gTLDs were classified as fully or substantially failing an accuracy test. This needs to be rectified, especially with the opening of new gTLDs on a massive scale. Accountability is greatly needed if there is any hope of maintaining a true sense of trust and safety on the internet both by users and the business and intellectual property constituencies.

Second, the study does not give credence to the full scope of the WHOIS accuracy problem. There may also be a larger inaccuracy issue with regard to proxy and privacy practices, because the study did not fully explore beyond the registration service. The study assumes that all of the registrations made through the proxy or privacy service ... 15% of all registrations ... are accurate because it is possible to contact the proxy/private registration service. The question then has to become, is it possible to contact the actual registrant – the customer of the proxy service – or even to learn that party's identity and valid contact data? Future studies and initiatives must address this concern.

Third, the study suggests cost-effective ways to make implementing a stronger WHOIS accuracy policy more economically feasible, such as matching name and address with the credit card used during the registration process. We support moving forward with this effort.

Finally, with the imminent launching of so many new gTLDs, there is a certain urgency in the air. ICANN needs to lead the way in improving WHOIS accuracy, in order to perform its duty and pledge to effectively manage the domain name system with the public's interest in mind.

We trust that ICANN and others involved in this process agree with our concerns, and that we can continue to work together to make the internet a safer and more reliable place to do business.

Respectfully submitted,

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