



InterContinental Hotels Group

July 12, 2012

Three Ravinia Drive
Suite 100
Atlanta, GA 30346-2149
www.ihg.com

RE: WHOIS Proxy/Privacy Reveal & Relay Feasibility Survey
Draft Report to the Internet Corporation for Assigned Names and Numbers (ICANN)

To Whom it May Concern:

InterContinental Hotels Group (IHG) is pleased to write in response to the findings of the Interisle Consulting Group in their May report to ICANN on the WHOIS Proxy/Privacy Reveal & Relay Feasibility Survey. IHG recognizes the challenges presented in securing a full study of WHOIS privacy and proxy use, but believes the importance of acquiring the information gained in such a study cannot be overstated. IHG urges ICANN to move forward with the studies commissioned by the GNSO Council, despite the concerns of Interisle in regards to confidentiality, participation, and convenience.

Additionally, IHG would like to affirm its own support of the study and volunteer for participation. IHG is the world's largest hotel company by number of rooms with more than 620,000 rooms in over 100 countries. IHG has been an industry leader in making use of the Internet for productive and innovative commerce to support its nine brands and those in development. IHG believes that it is only through a study such as the one proposed by the GNSO Council that the process of relay and reveal requests for Privacy and Proxy-registered domains can be better understood.

A study can provide the basis for policy development and lead to formal agreements on the structure of both proxy and privacy services. Such agreed structures can then be part of a revised Registrar Administration Agreement (RAA) and lead to improved communication and cooperation among those seeking registrant data; those providing proxy and privacy services; and the registrars collecting and maintaining data. This cannot be seen as anything other than an imperative and important step in the continued effort to improve WHOIS.

Respectfully,

D. Franklin Moore, Jr.
Vice President & Associate General Counsel



Six Continents Hotels, Inc.
A Member of the InterContinental Hotels Group