

INTRODUCTION

MarkMonitor welcomes the opportunity to comment on the Initial Report of the GNSO Thick Whois Policy Development Process Working Group¹.

We support the comments made by the International Trademark Association (INTA)², Valideus³, ICPCP⁴, ALAC⁵, and the Business Constituency⁶.

COMMENT

MarkMonitor supports the Working Group recommendation that:

The provision of thick Whois services should become a requirement for all gTLD registries, both existing and future.

We support the following conclusions contained in the Initial Report:

Requiring a Thick Whois would:

- Improve response consistency
- Improve stability
- Improve access to Whois data
- Provide a more level playing field for competitive purposes
- Improve access to escrowed data in the event of failure

Requiring a Thick Whois ***does not***:

- Raise data protection or privacy issues specific to ‘thin’ vs. ‘thick’ Whois
- Impose overly burdensome cost impacts on providers of Whois data, and in fact reduces costs to consumers of data

¹ Initial Report on the Thick Whois Policy Development Process, June 21, 2013, at <http://www.icann.org/en/news/public-comment/thick-whois-initial-21jun13-en.htm>.

² Reply Comments of the INTA Internet Committee, August 2, 2013, at <http://forum.icann.org/lists/comments-thick-whois-initial-21jun13/msg00007.html>.

³ Valideus Comment on Thick Whois, August 2, 2013, at <http://forum.icann.org/lists/comments-thick-whois-initial-21jun13/msg00006.html>.

⁴ ICPCP Statement on the Thick Whois Initial Report, July 28, 2013, at <http://forum.icann.org/lists/comments-thick-whois-initial-21jun13/msg00005.html>.

⁵ ALAC Statement on the Thick Whois Initial Report – GNSO Policy Development Process, July 21, 2013, at <http://forum.icann.org/lists/comments-thick-whois-initial-21jun13/msg00004.html>.

⁶ Business Constituency Comment on Thick Whois Initial Report, August 3, 2013, at <http://forum.icann.org/lists/comments-thick-whois-initial-21jun13/msg00008.html>.

- Have detrimental effects on data synchronization, authoritativeness⁷ or existing 3rd party Whois service providers

Additionally, MarkMonitor encourage registries that are currently operating a ‘thin’ Whois to migrate to a normalized Thick Whois without delay.

In addition to capturing the many benefits outlined by the Thick Whois PDP Working Group, operating a normalized Thick Whois, consistent with all other gTLDs, will facilitate a smooth transition to the next generation of Registration Directory Service (RDS), currently being deliberated by ICANN’s Expert Working Group and the ICANN Community.

ABOUT MARKMONITOR

MarkMonitor, the world leader in enterprise brand protection and a Thomson Reuters Intellectual Property & Science business, uses a SaaS delivery model to provide advanced technology and expertise that protects the revenues and reputations of the world's leading brands. In the digital world, brands face new risks due to the web's anonymity, global reach and shifting consumption patterns for digital content, goods and services. Customers choose MarkMonitor for its unique combination of industry-leading expertise, advanced technology and extensive industry relationships to preserve their marketing investments, revenues and customer trust. Learn more at www.markmonitor.com.

Respectfully Submitted,

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⁷ MarkMonitor believes that the Registry should maintain the authoritative database.