



30 July 2013

Re: Valideus Comments on “Thick Whois Initial Report – GNSO Policy Development Process”

We write to express our support for the recommendation of the Thick Whois Policy Development Process Working Group that *the provision of thick Whois services should become a requirement for all gTLD registries, both existing and future.*

Requiring thick Whois for all TLD registries would provide a range of benefits to Internet users, from law and rights enforcement, to registries and registrars, by facilitating a consistent approach to Whois.

All TLD registries should be required to use *normalized* Thick Whois for at least the following reasons:

- Improved Response Consistency: Universal Thick Whois will contribute to uniform data output
- Improved Stability: Thick Whois data would be stored in redundant, recoverable sources
- Improved Access to Whois data: Thick Whois data is centrally accessible
- Enhanced Competition: Universal Thick Whois will contribute to a level playing field across all TLDs
- Increased Sources of Escrowed Data: Thick Whois would contribute to accessibility of stable data
- No New Data Protection or Privacy Issues: Data protection/privacy questions are similar in both Thick and Thin Whois, and should not be conflated to stall requiring Thick Whois for all TLD registries
- The Benefits Outweigh any Cost Impact: Existing TLD registries who are providing back-end services for new gTLD applicants should be familiar with Thick Whois configurations
- No Detrimental Effects: As far as we understand, Thick Whois will not have any detrimental effect on data synchronization, authoritativeness, or existing 3rd party service providers

Finally, we believe that migrating all TLDs to a Thick Whois model as soon as practicable will lay the groundwork for a smooth transition process if a common Thick Whois model would be replaced by the Aggregated Registration Data Service (ARDS) currently proposed by ICANN’s Expert Working Group.

Thank you for noting our support for the recommendation to apply Thick Whois in all TLD registries.

Yours sincerely,

/s/

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Valideus