To: ICANN
From: Messaging, Malware and Mobile Anti-Abuse Working Group (M³AAWG)
Date: 13 July 2013
Subject: Comments on Thick Whois Initial Report

The Messaging, Malware and Mobile Anti-Abuse Working Group (M³AAWG) is a global nonprofit organization founded to develop effective models to combat online threats such as botnets, phishing, malware, spam and denial-of-service attacks that can cause great harm to both individuals and national economies. Representing more than one billion mailboxes, M³AAWG is the largest global organization developing cross-sector approaches to protecting users and network infrastructure.

Our members include technical experts, researchers and policy specialists from a broad base of network operators and from key technology providers, academia, and volume messaging sender organizations. The multidisciplinary approach at M³AAWG (www.m3aawg.org) includes the development of industry best practices, educational tools, technical statements on public policy and legislation, and the facilitation of global collaboration.

We appreciate the opportunity to comment on the Thick Whois Initial Report. We endorse the primary conclusion of the report that all registries should provide thick Whois, and the few that do not should promptly move from thin to thick Whois. M³AAWG members use Whois as a key tool when analyzing and mitigating online abuse, and thick Whois provides advantages both in more reliable service and more consistent message formats.

We understand there may be other changes to Whois, such as those under development in the IETF WEIRDS working group and ICANN's Expert Working Group. But moving to thick Whois is an important step that ICANN can take now with real benefits and without interfering with those other changes.

Please address any questions or requests for additional information to Jerry Upton, M³AAWG Executive Director at jerry.upton@m3aawg.org

Yours truly,
s/s
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