



CADNA Comments on the "Preliminary Issue Report on 'Thick' Whois"

The Coalition Against Domain Name Abuse (CADNA) welcomes the opportunity to comment on the "Preliminary Issue Report on 'Thick' Whois." As a coalition of brand owners concerned about trademark infringement issues, CADNA believes that implementing more uniform Whois standards across registries could ultimately deter cybersquatting and other online trademark infringing activities.

Given that the domain name space is poised to dramatically expand with the January 2012 launch of ICANN's New gTLD Program, now is the time to review existing policies towards incumbent gTLDs. Therefore, CADNA applauds the recommendation by ICANN's staff to move forward with further investigation of Thick Whois by initiating a GNSO Council policy development process (PDP). The "Preliminary Issue Report" outlines many important topics to consider if the PDP goes ahead.

At this point, CADNA is in agreement with the ICANN staff's preliminary expectation that further investigation of Thick Whois for all incumbent gTLDs would prove to be beneficial to the Internet community at large. CADNA would also suggest adding to those issues identified for further research an investigation into the risks, such as cybersquatting or other cybercriminal activity, currently posed by those registries that maintain a Thin Whois. Such information would help form a balanced picture of the costs and benefits of a new Thick Whois policy for all incumbent gTLDs.

Similarly, CADNA would like to see the PDP address the issue of Whois enforcement. While a Thick Whois is helpful both to deter and detect cybersquatters, ultimately, enforcing strict rules regarding the accuracy of such information will be most beneficial to law enforcement officials in the attempt to fight trademark-infringing activities.