

On behalf of the International Anti-Counterfeiting Coalition (IACC), we are pleased to provide comments on the Preliminary Issue Report on ‘Thick’ WHOIS (“WHOIS Report”). The IACC has been actively engaged in the ICANN processes, in part through its membership in the Intellectual Property Constituency and through the public comment process.

The IACC long-standing concern with ICANN’s stewardship of the WHOIS database derives from the IACC’s mission to combat commercial counterfeiting. In addition to obvious benefits of insuring accountability for commercial activity online, access to and the accuracy and completeness of WHOIS data is instrumental to IACC members in their efforts to address the proliferation of online counterfeiting.

ICANN’s repeated failures to insure compliance with its underlying commitments to preserve the WHOIS database has been the subject of repeated commentary by the IACC through the ICANN public comment process.

It is with some satisfaction, therefore, that the IACC reviewed the WHOIS report and finds its conclusions concerning the thick WHOIS requirement broadly consistent with the IACC’s previous comments.

The IACC therefore supports the staff recommendation; namely that the proposed issues are within the scope of the ICANN policy process and that the GNSO council proceed with a policy development process concerning uniform implementation of a thick WHOIS requirement upon all registries.