



Comments on the Draft Report for the Study of the Accuracy of WHOIS Registrant Contact Information

The Coalition Against Domain Name Abuse (CADNA) appreciates the opportunity to provide comments on the Draft Report for the Study of the Accuracy of WHOIS Registrant Contact Information and offer its recommendations on how to improve the overall accuracy of WHOIS data.

It is extremely troubling that only 22.8 percent of the domain names in the study met all three criteria of accuracy and as such can be considered fully accurate. When extrapolated to the domain name space as a whole, these figures mean that approximately 90 million domain names are registered with false, incomplete or unverifiable information. WHOIS records are important mechanisms of accountability, especially when the domain name in question is being used for malicious activity, and so their accuracy is crucial in order to bring criminals and bad actors to justice. It is unacceptable to have such flawed records and ICANN must work to ensure that WHOIS information is both accurate and accessible.

In addition to simply ensuring that the required WHOIS information, namely phone number and mailing address, is valid, WHOIS records could be significantly improved by requiring a valid email address as well. In the majority of cases, contact made with a domain name registrant is initiated through email, given that it is typically the most efficient means of interaction. And yet, the RAA currently does not require a valid, functioning email address in the contact information for registrants. This study should have included analysis regarding the accuracy of email addresses in current WHOIS records, since such thoroughly accurate WHOIS records should be a priority for ICANN.

In CADNA's opinion, ICANN should work with registrars to communicate the importance of accurate WHOIS records to both current and future registrants, while also seeking to address registrants' privacy concerns. The Internet cannot be a lawless space where individuals are allowed to remain anonymous and not accountable for their actions.

Most importantly, CADNA strongly believes that the key to improving WHOIS accuracy overall will be to enforce consistency of requirements among registrars. It is a widely known fact that some registrars are much more lenient than others, and this imbalance will only continue to foster certain registrants' refusal to provide accurate and sufficient contact information. Another facet of increasing the level of uniformity across the domain name space should be to create a centralized database of WHOIS records, in accordance with the recommendations made by the ICANN Business Constituency.