



BITS

FINANCIAL SERVICES
R O U N D T A B L E

January 12, 2007

To: Internet Corporation for Assigned Names and Numbers

e-mail address: whois-comments@icann.org

Re: Endorsement of Special Circumstances Model for WHOIS Data Base

Dear Sirs and Madams:

The Financial Services Roundtable and BITS appreciate the opportunity to comment on the proposal before the Internet Corporation for Assigned Names and Numbers (ICANN) to limit the type of information collected and maintained in the WHOIS data base. This a follow-up comment letter to the one that BITS submitted on April 14, 2006 (see <http://www.bitsinfo.org/downloads/Comment%20letters/WHOISCommentBITSFINALApr06.pdf>).

On September 21, 2006, our member companies endorsed the “Special Circumstances Model” with the understanding that the “Special Circumstances Model” provides unrestricted access to WHOIS information, while, at the same time, provides a mechanism to protect the privacy concerns of individual, non-commercial registrants who can demonstrate a need to mask their WHOIS data. Our members, as well as numerous other financial institutions use the WHOIS data to identify cybersquatters and domain infringement, investigate online frauds and phishing, manage their domain names and intellectual property, and conduct e-commerce by researching other online entities. Full WHOIS registration data is essential to perform these functions.

Our members do not support the Operational Point of Contact (OPOC) proposal because it would suppress public access to the full registration data of every registrant including corporations, businesses and others who, by having a website, are advertising their existence to the public. This suppression goes far beyond what legitimate privacy concerns require. In addition, the OPOC proposal does not provide for any time limits associated with data requests from a third party to the OPOC nor are there any defined sanctions for failing to comply with a request.

Attached is a list of our member companies which includes 100 of the largest US-based financial institutions. The Financial Services Roundtable is a national association that represents 100 of the largest integrated financial services companies providing banking, insurance, investment products, and other financial services to American consumers.

Roundtable member companies provide fuel for America's economic engine, accounting directly for \$50.5 trillion in managed assets, \$1.1 trillion in revenue, and 2.4 million jobs.

BITS is a nonprofit industry consortium that shares its membership with The Financial Services Roundtable. BITS' mission is to serve the financial services industry's needs at the interface between commerce, technology and financial services. BITS works as a strategic brain trust to provide intellectual capital and address emerging issues where financial services, technology and commerce intersect. BITS focuses on key issues where industry cooperation serves the public good, such as critical infrastructure protection, fraud prevention, and the safety of financial services. BITS' activities are driven by the CEOs and their direct reports—CIOs, CTOs, Vice Chairmen and Executive Vice President-level executives of the businesses. For more information, go to www.bitsinfo.org.

If you have any further questions or comments on this matter, please do not hesitate to contact me or John Carlson at john@fsround.org or 202- 289-2442.

Sincerely,

A handwritten signature in black ink that reads "Catherine A. Allen". The signature is written in a cursive style and is positioned to the left of a vertical red line.

Catherine A. Allen
CEO, BITS

A handwritten signature in black ink that reads "Richard M. Whiting". The signature is written in a cursive style.

Richard M. Whiting
Executive Director and General Counsel
The Financial Services Roundtable

Attachment



MEMBER COMPANIES

| COMPANY | CITY |
|---|---------------------|
| ACE INA Holdings, Inc. | Philadelphia, PA |
| AEGON USA, Inc. | Baltimore, MD |
| Affiliated Managers Group, Inc. | Prides Crossing, MA |
| Allianz Life Insurance Company of North America | Minneapolis, MN |
| Allied Capital Corporation | Washington, DC |
| The Allstate Corporation | Northbrook, IL |
| American Express Company | New York, NY |
| American International Group, Inc. | Evansville, IL |
| Aon Corporation | Chicago, IL |
| Associated Banc-Corp | Green Bay, WI |
| Assurant, Inc. | New York/Atlanta |
| AXA Financial, Inc. | New York, NY |
| BancorpSouth, Inc. | Tupelo, MS |
| BancWest Corporation | Honolulu, HI |
| Bank of America Corporation | Charlotte, NC |
| Bank of Hawaii Corporation | Honolulu, HI |
| The Bank of New York Company, Inc. | New York, NY |
| Barclays Capital, Inc. | New York, NY |
| BB&T Corporation | Winston-Salem, NC |
| Capital One Financial Corporation | Falls Church, VA |
| The Charles Schwab Corporation | San Francisco, CA |
| The Chubb Corporation | Warren, NJ |
| Citigroup Inc. | New York, NY |
| Citizens Financial Group, Inc. | Providence, RI |
| City National Corporation | Beverly Hills, CA |
| Comerica Incorporated | Detroit, MI |
| Commerce Bancshares, Inc. | Kansas City, MO |
| Compass Bancshares, Inc. | Birmingham, AL |
| Countrywide Financial Corporation | Calabasas, CA |
| Cullen/Frost Bankers, Inc. | San Antonio, TX |
| Edward Jones | St. Louis, MO |
| Federated Investors, Inc. | Pittsburgh, PA |
| Fidelity Investments | Boston, MA |
| Fifth Third Bancorp | Cincinnati, OH |
| First Commonwealth Financial Corporation | Indiana, PA |
| First Horizon National Corporation | Omaha, NE |
| Ford Motor Credit Company | Dearborn, MI |
| Fulton Financial Corporation | Lancaster, PA |
| General Electric Company | Stamford, CT |
| Genworth Financial | Richmond, VA |
| GMAC Financial Services | Detroit, MI |
| Guaranty Financial Services | Austin, TX |
| H&R Block, Inc. | Kansas City, MO |

COMPANY**CITY**

| | |
|--|--------------------|
| Harris Bankcorp, Inc. | Chicago, IL |
| HSBC North America Holdings, Inc. | Chicago, IL |
| Huntington Bancshares Incorporated | Columbus, OH |
| ING | Atlanta, GA |
| John Deere Credit Company | Johnston, IA |
| John Hancock Financial Services, Inc. | Boston, MA |
| JPMorgan Chase & Co. | New York, NY |
| KeyCorp | Cleveland, OH |
| LaSalle Bank Corporation | Chicago, IL |
| Legg Mason, Inc. | Baltimore, MD |
| Lincoln National Corporation | Philadelphia, PA |
| M&T Bank Corporation | Buffalo, NY |
| Marshall & Ilsley Corporation | Milwaukee, WI |
| MassMutual Financial Group | Springfield, MA |
| MasterCard Worldwide | Purchase, NY |
| Mellon Financial Corporation | Pittsburgh, PA |
| Mercantile Bankshares Corporation | Baltimore, MD |
| Merrill Lynch & Co., Inc. | New York, NY |
| National City Corporation | Cleveland, OH |
| Nationwide | Columbus, OH |
| New Century Financial Corporation | Irvine, CA |
| Northern Trust Corporation | Chicago, IL |
| The PNC Financial Services Group, Inc. | Pittsburgh, PA |
| Popular, Inc. | San Juan, PR |
| Principal Financial Group | Des Moines, IA |
| Protective Life Corporation | Birmingham, AL |
| Prudential Financial Inc. | Newark, NJ |
| Raymond James Financial, Inc. | St. Petersburg, FL |
| RBC Centura Banks, Inc. | Rocky Mount, NC |
| Regions Financial Corporation | Birmingham, AL |
| Sky Financial Group, Inc. | Bowling Green, OH |
| Sovereign Bancorp, Inc. | Reading, PA |
| State Farm Insurance Companies | Bloomington, IL |
| State Street Corporation | Boston, MA |
| SunTrust Banks, Inc. | Atlanta, GA |
| Synovus | Columbus, GA |
| TD Banknorth, Inc. | Portland, ME |
| TIAA-CREF | New York, NY |
| Toyota Motor Credit Corporation | Torrance, CA |
| UBS | Stamford, CT |
| UnionBanCal Corporation | San Francisco, CA |
| United Bankshares, Inc. | Parkersburg, WV |
| UnumProvident Corporation | Chattanooga, TN |
| U.S. Bancorp | Minneapolis, MN |
| USAA | San Antonio, TX |
| Wachovia Corporation | Charlotte, NC |

| COMPANY | CITY |
|------------------------------------|---------------------|
| Waddell & Reed Financial, Inc. | Overland Park, KS |
| Washington Mutual, Inc. | Seattle, WA |
| Webster Financial Corporation | Waterbury, CT |
| Wells Fargo & Company | San Francisco, CA |
| Western & Southern Financial Group | Cincinnati, OH |
| Whitney Holding Corporation | New Orleans, LA |
| Zions Bancorporation | Salt Lake City, UT |
| Zurich Financial Services | Zurich, Switzerland |

*97 Roundtable/BITS Member Companies as of November 30, 2006.

BITS AFFILIATE ORGANIZATIONS

| ORGANIZATION | CITY |
|--|------------------|
| American Bankers Association (ABA) | Washington, D.C. |
| Association for Payment Clearing Services (APACS) | London, UK |
| Canadian Bankers Association (CBA) | Toronto, Canada |
| Canadian Payments Association (CPA) | Ottawa, Canada |
| Chevy Chase Bank | Washington, DC |
| The Clearing House | New York, NY |
| Credit Union National Association (CUNA) | Washington, D.C. |
| The Depository Trust & Clearing Corporation (DTCC) | New York, NY |
| Financial Services Technology Consortium | New York, NY |
| Independent Community Bankers of America (ICBA) | Washington, D.C. |
| NetBank, Inc. | Alpharetta, GA |

*11 BITS Affiliate Companies as of June 14, 2006.