



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, reading "Catherine A. Allen". The signature is written in a cursive style. A vertical red line is positioned to the right of the signature.

Catherine A. Allen
CEO, BITS

A handwritten signature in black ink, reading "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	Torrence, 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.