



The Intellectual Property Constituency (IPC) of the GNSO appreciates this opportunity to comment on the Initial Report of the Expert Working Group on gTLD Directory Services (EWG). See <http://www.icann.org/en/groups/other/gtld-directory-services/initial-report-24jun13-en.pdf>.

IPC members have a strong and abiding interest in reliable, consistent access to accurate and comprehensive gTLD registration data. Our active participation in the debates within ICANN about Whois over the past decade and more reflect the intensity of this interest.

The EWG Initial Report proposes to replace the existing Whois with a new model for gTLD registration data services. In so doing, the EWG has taken a significant step forward in bringing this debate within ICANN to a new (and, we hope, more constructive) level, by putting forth a relatively detailed proposal that deserves serious and careful consideration.

At the same time, as noted by many of the public comments posted to date, the Initial Report leaves unaddressed (or only minimally addressed) many aspects of the EWG's proposal, including (but not limited to) such important questions as how proxy and privacy registration services would be regulated; how the costs of the new system would be allocated; and how the process of authentication of requesters would be carried out. The Initial Report also lacks detail on how the accuracy of registration data would be improved under the proposal compared to the baseline measures established by the 2013 version of the RAA and other ICANN initiatives.

Accordingly, while thanking all EWG members for their extensive and constructive work so far, IPC will defer specific comments until a more detailed proposal is put forward. In the meantime, we note that some IPC members have submitted more extensive comments on the Initial Report, and urge that these be given serious consideration.