



## IPC Comments on Thick Whois Initial Report

August 2, 2013

The Intellectual Property Constituency (IPC) appreciates this opportunity to comment on the Initial Report of the Thick Whois Policy Development Process Working Group. See <http://gnso.icann.org/en/issues/whois/thick-initial-21jun13-en.pdf>.

IPC strongly endorses the recommendation of the Working Group that “the provision of thick Whois services should become a requirement for all gTLD registries, both existing and future.” This recommendation appears to have the support of an unusually broad cross-section of the ICANN community, including both Whois users (such as IPC members) and the registries and registrars responsible for collecting Whois data and making it accessible. The Initial Report examines a number of issues associated with the recommendation, and clearly concludes that the anticipated benefits greatly outweigh the possible costs of this requirement.

IPC also welcomes the strong support shown by previous commenters for the recommendation of the Initial Report. See generally <http://forum.icann.org/lists/comments-thick-whois-initial-21jun13/>. In particular, we support the following statement of the Messaging, Malware and Mobile Anti-Abuse Working Group (M3AAWG): “We understand there may be other changes to Whois, such as those under development in the IETF WEIRDS working group and ICANN's Expert Working Group. But moving to thick Whois is an important step that ICANN can take now with real benefits and without interfering with those other changes.” See <http://forum.icann.org/lists/comments-thick-whois-initial-21jun13/pdf5jGgKEmU0p.pdf>. IPC agrees. Although we welcome the steps toward development of a new model for gTLD Registration Data Services, and are participating actively in several of those initiatives, our current Whois system will not be changed overnight. Until decisions are reached on what succeeds the current Whois system, it is imperative to take all reasonable steps to improve the accessibility of and accuracy to Whois data, and to make sure the current system is as effective as possible. A Thick Whois requirement will contribute to that improvement, and is long overdue. It should not be delayed further because of the pendency of other initiatives that may ultimately lead to adoption of a new model. We would only add that the transition from Whois to any new model is likely to be made much less complex if a consistent Thick Whois structure is already in place across the gTLD space.

Respectfully submitted,

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