

Comments on the On WHOIS Review Team Draft Final Report

ICANN Internet Service Provider and Connectivity Providers Constituency

The Internet Service Provider and Connectivity Providers Constituency (ISPCP) welcome the opportunity to comment on the Draft Final Report of the WHOIS Review Team. See <http://www.icann.org/en/reviews/affirmation/whois-rt-draft-final-report-05dec11-en.pdf>.

The ISPCP have actively engaged in the debates within the GNSO Council on WHOIS over many years and view the work of the WHOIS Review Team as an extremely important step towards improving the WHOIS function.

The Recommendations made by the WHOIS Review team are supported by the ISPCP although it is noted that other activities which are being progressed in parallel, such as work on the Registrar Accreditation Agreement may impact some aspects of the Recommendations. Attention to ensuring implementation of the Recommendations is achieved within the shortest possible time, is urged.

The ISPCP also offer the following specific comments.

The lack of a clear, concise and well communicated WHOIS policy, as clearly identified within the draft report, particularly after so much effort has already been expended by the GNSO on WHOIS issues leaves a significant gap that demands urgent attention.

The need to make WHOIS a strategic priority and allocate dedicated resources to ensure compliance, as detailed in Recommendation 3, is fully supported by the ISPCP. Too much time and effort has already been expended on WHOIS with minimum results being achieved. Adoption of this Recommendation is required to ensure that situation does not continue.

When considering the Review Team's report and the documents and other studies recognized within it, such as the 2010 NORC Data Accuracy Study referred to in Recommendation 5, it was noted that further effort is still required to ensure a clear and concise understanding of definitions and terms as this work is advanced.

The need for data accuracy has been at the heart of the ISPCP concerns related to WHOIS and on that basis Recommendations 5 to 9 are of particular note. The proposed improvements in accuracy along with enforceable, binding contractual agreements will facilitate urgently required improvements.

Recommendation 17 which looks to improve access to WHOIS data refers to the provision of thick WHOIS data. The ISPCP supports the provision of thick WHOIS data where achievable, but stresses the need for accurate data so the information is both meaningful and fit for its agreed use. Without that improvement the question of thick or thin WHOIS data becomes irrelevant.

The IPSCP constituency understands that the AoC refers only to ICANN policies and therefore WHOIS issues in the ccTLD space and the IP addressing were out of scope for this review. In that context ISPCP suggests that the actors having competencies in these very important additional areas proceed to their own review following the example of the WHOIS review team, and make it public.

It is considered essential a review of the implementation of the Recommendations coupled with a detailed assessment of the improvements that have resulted, is followed up by future review teams.

The ISPCP would like to thank the members of the WHOIS Review Team for their tenacity and dedication in tackling an issue that has proved so difficult to progress in the past and congratulate them on producing a coherent and progressive set of Recommendations that should now be implemented without undue delay.

Submitted on behalf of the ISPCP Constituency