

To: Internet Corporation for Assigned Names and Numbers (ICANN)
From: Messaging, Malware and Mobile Anti-Abuse Working Group (M³AAWG)
Date: May 21, 2012
Subject: Comments on ICANN WHOIS Policy Review Team Final Report

To whom it may concern:

The Messaging, Malware and Mobile Anti-Abuse Working Group (M³AAWG) is a global nonprofit organization founded to develop effective models and solutions to combat online abuse such as phishing, botnets, fraud, spam, viruses and denial-of-service attacks that can cause great harm to both individual and national economies. M³AAWG includes technical experts, researchers and policy specialists from a broad base of Internet service providers and network operators representing over one billion email accounts, and from key technology providers, academia, and volume messaging sender organizations. The multidisciplinary approach at M³AAWG includes (1) the development of industry best practices, education tools, and technical statements on public policy and legislation; and (2) the facilitation of global collaboration.

The members of M³AAWG rely on accurate WHOIS data as a critical resource to identify actors on the Internet, both good and bad. WHOIS data allows them to identify miscreants, recognize multiple streams of abuse from the same or related parties, and contact responsible parties to mitigate abuse. When WHOIS data is inaccurate or missing, M³AAWG members are less able to do their jobs and protect their clients and the public.

M³AAWG strongly endorses the Final Report of the WHOIS Policy Review Team. The 16 recommendations set out a roadmap to a more accurate WHOIS that is well within ICANN's ability to execute. We encourage ICANN to adopt the report in full, and to implement the recommendations as quickly as possible, certainly starting all of them within the next calendar year.

Sincerely,

/signed/

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