



To: Internet Corporation for Assigned Names and Numbers (ICANN)
From: Messaging Anti-Abuse Working Group (MAAWG)
Date: October 28, 2010
Subject: ICANN Study on the Prevalence of Domain Names Registered using a Privacy or Proxy Registration Service **among the top 5 gTLDs**

Thank you for the opportunity to submit comments relating to the ICANN Study on the Prevalence of Domain Names Registered using a Privacy or Proxy Registration Service [<http://www.icann.org/en/announcements/announcement-14sep10-en.htm>].

The Messaging Anti-Abuse Working Group (MAAWG) is an international non-profit industry-led organization founded to fight all forms of messaging abuse, such as spam, viruses, denial-of-service attacks and other messaging exploitations such as phishing, botnets, fraud, spam, viruses and denial-of-service attacks. MAAWG draws technical experts, researchers, and policy specialists from a broad base of Internet Service Providers and Network Operators representing over one billion mailboxes, as well as from key technology providers, academia and volume sender organizations. The multi-disciplinary approach at MAAWG (www.MAAWG.org) includes education, advice on public policy and legislation, development of industry best practices, guidance in the development of industry standards, and the facilitation of collaboration.

MAAWG offers the following comments on the ICANN Study on the Prevalence of Domain Names Registered using a Privacy or Proxy Service among the top 5 gTLDs:

First, we are pleased to see that ICANN has started to address the concerns that the Internet community has about proxy and privacy service domain registrations. In our experience, such domains account for a disproportionate amount of abusive activity and a better understanding of them is the first step to fashioning better rules to manage them.

The methodology appears reasonable for a small-scale study and the results – that about 20% of domains use a proxy or privacy service, and of those 20%, the vast majority provide no clue to the beneficial user's identity – are consistent with our observations.

We would encourage ICANN to do further analysis to see whether some TLDs and/or some registrars have a disproportionately high or low number of proxy or privacy registrations. This analysis should be easy to do without any extra data collection since the WHOIS dataset should identify each domain's registrar and the monthly registry TLD reports provide the number of domains each registrar had at the time the data was collected.

Finally, we note that ICANN is in the midst of an RFP for a further proxy/privacy study to document the relay and reveal practices of proxy/privacy services. We agree that this study is the essential next step, but we are baffled at ICANN's statement that the study will not even start until a yet to be determined

MAAWG

Messaging Anti-Abuse Working Group

P.O. Box 29920 ■ San Francisco, CA 94129-0920 ■ www.MAAWG.org ■ info@MAAWG.org

time in 2011. If this study is worth doing, which it certainly is, it is worth doing now. MAAWG encourages ICANN to perform this study as soon as is practicable.

In conclusion, MAAWG would like to thank you for the opportunity to submit these comments for your consideration, and we would welcome the opportunity to offer further assistance to ICANN on its work in this important area. Please feel free to contact me at Jerry.Upton@maawg.org.

Sincerely

/s/

Jerry Upton

Executive Director

Jerry.Upton@maawg.org