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April 13, 2010

VIA EMAIL ONLY (whois-accuracy-study@icann.org)

Mr. Rod Beckstrom, President and CEO and  
Mr. Peter Dengate Thrush, Chairman of the Board of Directors  
Internet Corporation for Assigned Names and Numbers (ICANN)  
4676 Admiralty Way, Suite 330  
Marina del Ray, California 90292

**Re: Request for Comments on Draft Report on WHOIS Accuracy**

Dear Messrs. Beckstrom and Dengate Thrush:

Verizon appreciates this opportunity to comment on the January 17, 2010 Draft Report for the Study of the Accuracy of WHOIS Registrant Contact Information as developed by NORC at the University of Chicago for ICANN. We appreciate the effort that NORC and ICANN put into this study.

Trademark owners like Verizon have long been aware of the unacceptably high levels of inaccurate information in the WHOIS database and this study only confirms this fact. Accurate WHOIS information remains a key priority for Verizon to enforce our rights against those who register domain names for the purpose of engaging in fraudulent and illegal activities, including cybersquatting, affiliate fraud and phishing. Since 2000, Verizon has expended millions of dollars in enforcement costs and continually encounters problems identifying accurate information in the WHOIS database.

It therefore comes as no surprise that the NORC study showed that only 23% of all WHOIS records could be considered fully accurate, which percentage increases when factoring in the data that could be considered substantially inaccurate. We do not believe that ICANN should permit such a large percentage of WHOIS data to remain either substantially or fully inaccurate. We also note that the NORC study failed to include nearly 15% of registrations made through proxy services. If the study had factored in proxy service data, we believe the levels of inaccurate information would have increased. Verizon typically encounters thousands of domain name infringements lacking valid information, which often resides with registrars offering proxy services.

On the positive side, this study highlights many important changes and best practices that registrars could easily employ to ensure greater accuracy of WHOIS data. For example, the ability to employ an automated system to validate the legitimacy of phone numbers could ensure that this

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data element is accurate before a domain name is registered. The use of a basic algorithm that checks zip codes and addresses on the front end of the service would eliminate a large percentage of inaccurate address information. Requiring proof of identity and a name and address that match that associated with valid credit card information would be an additional reasonable way of ensuring accurate WHOIS information.

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### Summary

This study highlights the need for ICANN to recommend additional measures to ensure WHOIS accuracy and to ramp up its compliance activities against registrars who continue to permit false whois information as part of the domain name registration process. The costs associated with ensuring a relatively high degree of whois accuracy are simply a cost of doing business in a responsible and reliable manner similar to common practices already employed by other companies in the provision of e-commerce.

We expect the introduction of new gTLDs to result in millions of new infringements for brand holders around the world. The study highlights that the introduction of new gTLDs will only exacerbate the infringement problem. It is therefore even more urgent to take action now to try to reduce inaccuracy through easy and common sense solutions.

Respectfully submitted,



Sarah B. Deutsch