



January 29, 2018

Mr. Cherine Chalaby
Chairman of the Board
ICANN

Mr. Goran Marby
CEO
ICANN

Dear Messrs. Chalaby and Marby:

We write to express our strong support for a publicly accessible and transparent WHOIS database, as well as for the comments submitted by the Intellectual Property Constituency on the three interim compliance models proposed by ICANN.

The Copyright Alliance is a non-profit, non-partisan public interest and educational organization representing the copyright interests of over 1.8 million individual creators and over 13,000 organizations in the United States, across the spectrum of copyright disciplines. The Copyright Alliance is dedicated to advocating policies that promote and preserve the value of copyright, and to protecting the rights of creators and innovators. The individual creators and organizations that we represent rely on copyright law to protect their creativity, efforts, and investments in the creation and distribution of new copyrighted works for the public to enjoy.

The accuracy and accessibility of WHOIS data is vital to members of the copyright community across the board in their efforts to sustain and build a legal marketplace for digital works and investigate infringement of the rights that protect those works. Thus, we are concerned about any efforts that would limit the continued public availability of WHOIS data. ICANN's governmental advisory committee, along with members of the law enforcement, intellectual property, and security communities have repeatedly communicated the strong public interest in ensuring the continued availability and transparency of WHOIS data. We strongly support ICANN's stated objective to ensure compliance with applicable law while maintaining the existing WHOIS system to the greatest extent possible.

In closing, we ask you to give serious consideration to the comments of the Intellectual Property Constituency as you develop an interim model that complies with the twin goals of being GDPR compliant and preserving as much access and transparency to WHOIS as possible. We thank you for consideration of our views.

Sincerely,

Keith Kupferschmid
Chief Executive Officer
Copyright Alliance