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THE AT-LARGE ADVISORY COMMITTEE

The ALAC Response to the GNSO Council's Accuracy Assignment

The ALAC appreciates the opportunity to comment on issues related to registration data Accuracy.

The ALAC and the At-Large Community are not practitioners in the field and will not attempt to identify specific harms related to data accuracy. However, in pursuit of the mandate of protecting Internet end users, we have strong opinions on the issue based on input from trusted law enforcement and consumer protection and fraud specialists, including those who participate in the GAC Public Safety Working Group.

At the ICANN79 meeting in San Juan, PR, the ALAC hosted a plenary session on the topic of building trust on the Internet through registrant verification.¹ This session took a holistic approach toward registrant data accuracy by drawing attention to the best practices of both gTLDs and ccTLDs and also included a presentation from a member of the European Union' Cooperation Group who addressed their work on data Accuracy.

The Draft Concept Proposal notes that there is much activity related to data accuracy in Europe and within ccTLDs. We therefore conclude that it is essential that we have full knowledge of such activities and its impact on contracted parties when ICANN considers taking any formal action.

Accordingly, the ALAC recommends that a third-party expert study be commissioned to survey:

- Registrant data verification business practices employed by both gTLDs and ccTLDs entities providing domain name registration services (registries, registrars, resellers, privacy/proxy providers), including both pre and post registration safeguards, e.g. initial registration, renewal, transfer, etc.
- Changes that gTLDs and ccTLDs entities providing domain name registration services (registries, registrars, resellers, privacy/proxy providers) in the European market have undertaken in their business practices to comply with NIS 2.0 requirements.

¹ See:

<https://icann79.sched.com/event/1a1DH/at-large-plenary-session-2-building-trust-on-the-internet-through-registrant-verification>.

- Consultation with all stakeholders within the ICANN community to account for their concerns and/or perspectives.

The ALAC further believes that, eventually, policy work will need to be undertaken to ensure that end users are fully protected and that we have a level playing field without “data-inaccuracy havens”. Such policy work would need to be informed by relevant knowledge, such as that mentioned above. Since we do not think sufficient usable knowledge has been gathered at this juncture, we believe any policy development work at this time would be premature.