

To: Internet Corporation for Assigned Names and Numbers (ICANN)
From: Messaging, Malware and Mobile Anti-Abuse Working Group (M³AAWG)
Date: 17 December 2013
Subject: M³AAWG Comments on the WHOIS Misuse Study

The Messaging, Malware and Mobile Anti-Abuse Working Group (M³AAWG) is a global nonprofit organization founded to develop effective models to combat online threats such as botnets, phishing, malware, spam and denial-of-service attacks that can cause great harm to both individuals and national economies. Representing more than one billion mailboxes, M³AAWG is the largest global organization developing cross-sector approaches to protecting users and network infrastructure.

Our members include technical experts, researchers and policy specialists from a broad base of network operators and from key technology providers, academia and volume messaging sender organizations. The multidisciplinary approach at M³AAWG (www.m3aawg.org) includes the development of industry best practices, educational tools, technical statements on public policy and legislation, and the facilitation of global collaboration.

We appreciate the opportunity to comment on the WHOIS Misuse Report. We commend ICANN's desire to better understand the actual use of WHOIS data, but find this study lacks credibility. The registrant survey only included 57 people out of a likely population of millions of registrants. Similarly the registry and registrar survey only included 22 out of more than 1,000 registrars and registries. Noted as well, the samples were mostly respondents located in the United States.

Since the data is clearly not adequate to support any conclusions, M³AAWG has no comment on the design of the survey questions or the conclusions drawn.

M³AAWG encourages ICANN to reject this report.

Please address any questions or requests for additional information to Jerry Upton, M³AAWG Executive Director, at jerry.upton@m3aawg.org.

Yours truly,
s/s
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