



U.S. House of Representatives
Energy and Commerce Committee
Subcommittee on Communications and Technology
2125 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Blackburn and Ranking Member Doyle:

The Coalition for a Secure and Transparent Internet (CSTI) writes to thank you for your leadership on the National Telecommunications and Information Administration (NTIA) reauthorization as it relates to WHOIS data. We applaud the draft NTIA Reauthorization Act of 2018 Section 105, "Sense of Congress on Preservation of Domain Name System and WHOIS Service" for calling attention to the critical importance of maintaining this data as free, transparent, and publically available.

As you know, WHOIS data is the publicly available information on who has registered and administers generic top level domain (gTLDs) names in spaces like .com and .net as well as certain country-code domain spaces like .TV. WHOIS data has been publicly accessible for free since the inception of the Domain Name System. Generic top-level domain name registrars and registries are contractually required to collect contact information from all domain name registrants at the time of registration. This contact data, including name, address, phone number, and email address, is combined with certain other attributes of a domain name's registration to comprise WHOIS data.

Due to an overly broad interpretation of the EU's General Data Protection Regulation (GDPR), many domain name registrars and registries are shutting down public access to the full range of WHOIS data, both for one-off requests and automated access. Law enforcement, consumer protection agencies, child advocacy groups, anti-human trafficking organizations, cybersecurity investigators, copyright and trademark holders, journalists, academics, and others rely on WHOIS to help determine *who is* operating a criminal website, sending malicious (SPAM, phishing) emails, or initiating cyber security attacks. When WHOIS data goes dark it takes away a critical source of information that is used to help keep the internet safe, secure and sustainable for all internet users.

CSTI encourages the Committee to do all you can to make WHOIS registration data publicly available in order to help protect Internet users from online criminal activity and to enable action against network and cyber security risks, intellectual property violations, and consumer fraud and abuse online.

Thank you again for your time and attention to this important issue. CSTI and our member organizations look forward to working with you on future versions of the language as you receive feedback, and on other efforts to ensure robust access to the WHOIS database continues. Please contact CSTI via Libby Baney (Libby.Baney@faegrebd.com) or Josh Andrews (Josh.Andrews@Faegrebd.cm) anytime.

Sincerely,
The Coalition for a Secure and Transparent Internet
www.SecureandTransparent.org

ACT | The App Association; Alliance for Safe Online Pharmacies; Coalition for Online Accountability; Crucial Point LLC; CTO Vision; DomainTools; LegitScript; National Association of Boards of Pharmacy; Recording Industry Association of America; Motion Picture Association of America and SpamHaus