



Unifying the Global Response to Cybercrime

November 14, 2013

Mr. Akram Atallah
President, Generic Domains Division
ICANN
12025 Waterfront Drive, Suite 300
Los Angeles, California 90094

RE: registry reports for gTLDs, with respect to e-crime

Dear Mr. Atallah:

Greetings. As the first new gTLDs enter the root, we write to you on behalf of the Anti-Phishing Working Group and its Internet Policy Committee. We are writing to inquire about the ways in which ICANN will make data about gTLD registrations and registry functions available to the community.

As background, the APWG (apwg.org) is the worldwide industry association of more than 2,000 member companies and other entities across industry, government, law enforcement and multi-lateral treaty organizations. The APWG facilitates cybercrime response and data-sharing efforts, and its Internet Policy Committee performs research and coordinates industrial education and engagement activities. The APWG has been publishing cybercrime statistical reports for more than a decade, drawing from a variety of sources, and also organizes the e-Crime Research Conference, the only peer-reviewed global conference dedicated exclusively to electronic crime studies.

ICANN has always required gTLD operators to submit a variety of monthly statistics about their operations, and ICANN publishes that data on its website. The data is essential for a variety of users. The APWG uses the data to measure the distribution and pervasiveness of e-crime. The ICANN community will need the data to measure the impact of the new gTLD program. And the data is clearly relevant to various ongoing policy and technical efforts — such as new registration data (WHOIS) models, research into DNS stability and security, the new zone file access program, etc.

To date, the data for existing gTLDs has been published in two different monthly reports per registry (usually one is a PDF file and one is a CSV file — although some registry operators release the data in PDFs only). Those interested in the data must download the individual reports per month, and extraction and collation of the data is difficult. The impending addition of more than 1,000 new gTLDs to the root will make ICANN's current practice completely unviable.

We kindly request that ICANN make all gTLD registry report data accessible to the community in a fashion that is more accessible and conducive for research and reference — in a way that allows downloading, totaling, and further analysis. Perhaps this would be in some kind of publicly searchable database, and a downloadable consolidated file.

The foundation to do so may already be in place. Specification 3 of the new gTLD contract requires new registry operators to submit their monthly Per-Registrar Transactions Reports and their Registry Functions Activity Reports in CSV format. We assume that ICANN will enter these reports into a database for its internal purposes (for example, to perform billing of registry fees, or for compliance



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purposes), and so we hope that public access to the new gTLD data can be easily accomplished. In any case, users should not be required to download a thousand-plus individual files.

Examples of the kinds of monthly data that users such as ourselves may wish to view, download, and analyze are:

- The number of domains under management in each registry, in summary and enumerated by registrar.
- The number of WHOIS queries and DNS queries served by each registry per month.
- The total number of domains sponsored by a given registrar, across all gTLDs.
- The number of transactions by TLD (and by registrar), such as for new domains created ("net adds"), renewals, transfer disputes, etc.

Making gTLD data accessible in a downloadable, searchable, and analyzable fashion will be consistent with ICANN's values of transparency and openness, is consistent with its registry contracts, and will be an important service to the community. Perhaps your staff can consult with the community to determine the best way to execute on this goal.

Thank you for your kind attention, and we look forward to your thoughts.

Sincerely yours,

A handwritten signature in cursive script that reads "Gregory C. Aaron".

Greg Aaron
Co-Chair, APWG Internet Policy Committee

A handwritten signature in cursive script that reads "Rod Rasmussen".

Rod Rasmussen
Co-Chair, APWG Internet Policy Committee

A handwritten signature in cursive script that reads "Peter Cassidy".

Peter Cassidy
Secretary General, APWG

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Dave Jevans
Chairman, APWG

cc: Mr. John Crain, Chief Security, Stability and Resilience Officer, ICANN