

ACCURACY AND INTEGRITY OF THE WHOIS DATABASE

HEARING BEFORE THE SUBCOMMITTEE ON COURTS, THE INTERNET, AND INTELLECTUAL PROPERTY OF THE COMMITTEE ON THE JUDICIARY HOUSE OF REPRESENTATIVES ONE HUNDRED SEVENTH CONGRESS SECOND SESSION

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MAY 22, 2002
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Serial No. 70
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Printed for the use of the Committee on the Judiciary



Available via the World Wide Web: <http://www.house.gov/judiciary>

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U.S. GOVERNMENT PRINTING OFFICE

79-752 PDF

WASHINGTON : 2002

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CONTENTS

MAY 22, 2002

OPENING STATEMENT

	Page
The Honorable Howard Coble, a Representative in Congress From the State of North Carolina, and Chairman, Subcommittee on Courts, the Internet, and Intellectual Property	1
The Honorable Howard Berman, a Representative in Congress From the State of California, and Ranking Member, Subcommittee on Courts, the Internet, and Intellectual Property	2

WITNESSES

The Honorable J. Howard Beales, III, Director, Federal Trade Commission	
Oral Testimony	4
Prepared Statement	6
Mr. Steven J. Metalitz, Vice President and General Counsel, Smith & Metalitz, LLP, on behalf of Copyright Coalition On Domain Names	
Oral Testimony	13
Prepared Statement	15
Mr. Cameron Powell, Vice President and General Counsel, SnapNames	
Oral Testimony	20
Prepared Statement	22
Mr. Michael D. Palage, Esquire	
Oral Testimony	30
Prepared Statement	33

APPENDIX

STATEMENTS SUBMITTED FOR THE HEARING RECORD

The Honorable Howard Berman, a Representative in Congress From the State of California, and Ranking Member, Subcommittee on Courts, the Internet, and Intellectual Property	81
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MATERIAL SUBMITTED FOR THE HEARING RECORD

Letter and recent publication from The Berkman Center For Internet & Society	82
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ACCURACY AND INTEGRITY OF THE WHOIS DATABASE

WEDNESDAY, MAY 22, 2002

HOUSE OF REPRESENTATIVES,
SUBCOMMITTEE ON COURTS, THE INTERNET,
AND INTELLECTUAL PROPERTY,
COMMITTEE ON THE JUDICIARY,
Washington, DC.

The Subcommittee met, pursuant to call, at 10:02 a.m., in Room 2141, Rayburn House Office Building, Hon. Howard Coble [Chairman of the Subcommittee] presiding.

Mr. COBLE. Good morning, ladies and gentlemen. The Subcommittee will come to order.

Mr. Berman I think, is en route. Since you all are here at the designated time we will go ahead and start the wheel turning. I am sure Howard will be here subsequently.

The Whois database refers to a series of information directories providing the identity of a Web site's origin or operator. Regrettably, the Internet all too often is a crime scene and is riddled with bogus domain registration information leaving law enforcement at a loss to protect the public. This is not a novel issue for the Subcommittee. As many of you know, we review this subject each year in light of its importance.

In December, the Ranking Member, Mr. Berman of California, and I undertook an informal oversight investigation. We sent letters to approximately 50 registrars asking some very simple questions about their respective domain name policies to further review the issues involved. The response was disappointing with respect to the quantity of replies but the content as well. It seems that the policies in place at many of the registrars did not seem to adequately address the concerns that we and many others have about fraudulent domain registrations.

In all fairness, as you all know, this is a complicated subject that is quickly evolving. This morning we will hear from a range of experts in their fields to help us understand the many issues pertaining to the accuracy and integrity of the Whois database. This is an issue of great importance to Mr. Berman and me; and, the scheduling permitting, it is my hope that this summer we will be able to schedule additional hearings to review the finer aspects of how developments impact the public. This is a subject we review annually and will continue to scrutinize.

At last year's hearing I explained that I was reluctant to introduce legislation, given the state of the Whois database. However, my disappointment has led me to change my mind on this. Earlier

this month, Mr. Berman and I introduced one bill that attempts to improve the quality of the Whois database's information. It is possible that additional legislation may be a necessary remedy to guarantee the public an accurate and reliable Internet and Whois system.

Mr. Berman is on his way. In the interest of time, if you all will permit me to introduce our panel, and then we will recognize Mr. Berman when he arrives.

Our first witness today is the Honorable Howard Beales, who serves as the Director of the Federal Trade Commission—strike that. I assume that the other Members have no opening statements. Didn't mean to ignore you all. Good to have the gentlemen from Virginia and Tennessee as well as the gentleman from Texas sitting in with us.

Mr. Howard Beales, who serves as the Director of the Federal Trade Commission's Bureau of Consumer Protection. Appointed by FTC Chairman Tim Muris in June, 2001, Mr. Beales has experience in both academia and government. His major areas of expertise and interest include law and economics, the economic and legal aspects of marketing and advertising, and other aspects of Government regulation of the economy.

Mr. Beales began his career at the FTC in 1977 as an economist specializing in consumer protection problems. He was named as Assistant to the Director of the Bureau of Consumer Protection, the first economist to hold that position, and later served as the Associate Director for Policy and Evaluation in the Bureau. He developed policy in a number of key areas, including the Commission's Deception and Advertising Policy Statements.

Mr. Beales left the FTC in 1987 for a year-long stint at the Office of Management and Budget. As a branch chief at OMB's Office of Regulatory Affairs, he managed the review of regulations proposed by several Cabinet departments. An Associate Professor of Strategic Management and Public Policy at George Washington University from 1988 until his recent appointment, he has published numerous scholarly articles on advertising and other aspects of consumer protection regulation.

Mr. Beales was born in Nebraska and reared in Mississippi. He graduated magna cum laude and Phi Beta Kappa from Georgetown University. He has a Ph.D in Economics from the University of Chicago.

Folks, as I have said to you all in previous hearings, sometimes the introductions can be lengthy indeed, but for the benefit of the uninformed who may not know what these witnesses have accomplished in their dossier I think it is important that you all know that.

Howard, why don't I suspend? I have already introduced Mr. Beales. Let me recognize the distinguished gentleman from California for his opening statement. Then I will recognize the remaining panelists.

Mr. BERMAN. Mr. Chairman, I think I will, given my tardiness—I was at the press conference announcing an unrelated piece of legislation, and it went longer. I apologize for being late.

Mr. COBLE. You are not running for the Senate, are you?

Mr. BERMAN. No. That is why I was wondering why I am there.

But, basically, I think what I will do is ask unanimous consent that my statement be made part of the record and allow to you continue.

Then there are issues I do want to raise regarding the problem with false domain name and false contact information that I think are very serious in the context of piracy and infringement, pornography, fraud, consumer protection that make it much more difficult to enforce our laws with this false contact information, but I think I will get into that. The witnesses will speak to it in the questioning.

So thank you, Mr. Chairman.

Mr. COBLE. Without objection.

[The prepared statement of Mr. Berman follows in the Appendix]

Mr. COBLE. I mentioned previously, Mr. Berman, about yours and my bill that we previously introduced.

Our second witness is Mr. Steven J. Metalitz, who is a partner in the Washington, DC, law firm of Smith & Metalitz and specializes in intellectual property, privacy and information law. He is testifying on behalf of the Copyright Coalition on Domain Names. He provides legal counseling and policy advocacy primarily for clients in the publishing, recording, motion picture, software and database industries.

Since November of 2000, Mr. Metalitz has served as President of the Intellectual Property Constituency, known as IPC, of the Domain Name Supporting Organization of ICANN. In this role he is a principal global spokesman for the interests of copyright and trademark owners in the management of the domain name system.

Mr. Metalitz is a member of the District of Columbia and South Carolina bars and currently teaches copyright law at George Washington University here in Washington.

Our third witness is Mr. Cameron Powell, Vice President of Business Development and General Counsel for SnapNames.com. SnapNames is a leading Internet company for a variety of domain and registration services and in addition publishes a well-known report entitled, State of the Domain.

Prior to joining SnapNames, Mr. Powell was employed by two start-up companies. In addition, he has practiced law as an intellectual property lawyer and litigator at Foley & Lardner, the Nation's tenth-largest law firm; as a trial lawyer in the Attorney General's Honor Program at the U.S. Department of Justice; and as a judicial clerk to a chief Federal judge.

Furthermore, Mr. Powell has taught intellectual property at the George Washington University Law Center. He holds a BS in Business Administration, summa cum laude, from the University Colorado at Boulder and a J.D. from Harvard Law School.

The Subcommittee is also grateful to have Mr. Michael Palage with us. Mr. Palage offers the Subcommittee the benefit of his expertise regarding this subject matter. Currently, he serves as chair of the ICANN Registrar Constituency; and, in addition, he is an intellectual property lawyer and entrepreneur. As the principal of Palage Consulting, he provides technical and business consultation services to small technology and Internet companies. He currently sits on the board of several companies which focus on the domain and registration services.

Prior to this, he was in private practice at the Philadelphia i.p. Firm of Seidel, Gonda, Lavorgna & Monaco. In addition to all of his other accomplishments, Mr. Palage was awarded a patent concerning a computerized business method.

He earned a degree in electrical engineering from Drexel University in 1990 and is a 1995 graduate of the Temple University School of Law, both of which are located in the great city of Philadelphia. He is a member of the Pennsylvania and Florida bars.

We have written statements from all of the witnesses on this panel, which I ask unanimous consent to submit into the record in their entirety.

I say to Mr. Berman, when I asked if you were going to be a senatorial candidate, I think you would be a good senator, but I wasn't trying to accelerate your departure from this side.

Good to have you all with us. Good to have those in the audience with us.

We try to adhere to the 5-minute rule here, as you all have been previously informed. When you see the red light illuminate into your eyes, you will know that the 5 minutes have elapsed. So if all can comply with that, we will be appreciative.

Mr. COBLE. Mr. Beales, we will commence with you.

**STATEMENT OF THE HONORABLE J. HOWARD BEALES, III,
DIRECTOR, FEDERAL TRADE COMMISSION**

Mr. BEALES. Thank you, Mr. Chairman. I am pleased to be here today to discuss the importance of accurate domain—

Mr. COBLE. Pull that mike a little closer.

Mr. BEALES. Thank you, Mr. Chairman. I am pleased to be here today to discuss the importance of accurate domain registration information in the Whois database for our consumer protection mission.

At the FTC, fighting Internet fraud is one of our top priorities. Since 1994, the FTC has brought more than 225 Internet-related law enforcement actions against 688 defendants, stopping consumer injury that we have estimated at more than \$2.1 billion.

It is hard to overstate the importance of accurate Whois data to our Internet investigations. In all of our investigations against Internet companies one of the first tools FTC investigators use to identify wrongdoers is the Whois database. We cannot easily sue fraudsters if we cannot find them. We cannot determine which agency can best pursue them if we are unable to figure out the country in which they are located.

The pace of Internet fraud makes it necessary to obtain rapidly the basic identifying information about the operator of a Web site. The existing Whois database does not serve this function as well as it could. Indeed, one survey on e-commerce issues by the Australian Taxation Office found that 10 to 15 percent of the data in the Whois database is inaccurate.

FTC investigations are being hampered by registration that is not only false but sometimes blatantly so. For example, Whois information for TabooSisters.com, a Web site that was targeted in one of our cases, indicated that the domain name was registered to a company located at 4 Skin Street in Amsterdam, with Amanda Hugandkiss listed as the administrative contact.

In another case, a Whois query for a Web site operated by the defendants provided a street address with Here There, California, with a zip code of 10001 for the administrative and technical contact.

These examples do not appear to be isolated incidents. An informal sampling of Whois queries conducted by FTC staff turned up a number of domain names with facially false address information, registered to Hacker, FBI, Mickey Mouse, even God.

Several recent searches have turned up false phone numbers, all 5s or all 8s. One recent search for Whois information listed the organization, administrative, technical and zone contact as a long string of Xes. Another listed U.S. address information for a business that in fact operated from another continent.

This accuracy problem is compounded when registrars fail to suspend domain names promptly when registrants willfully provided inaccurate contact information. Under the accreditation agreement between registrars and ICANN, registrars must collect information from registrants and post such information in a Whois service. Suspension of a domain name for willful failure to provide accurate contact information is within the discretion of the registrar. Their failure to suspend a domain name can allow anonymous fraudsters to remain online and have their sites viewed by thousands of consumers in a short period of time.

There is some room for improvement in the accreditation agreements that could address our concern.

First, it would be extremely useful if registrars could weed out blank or incomplete registration forms as well as some of the obviously false information that undermine the integrity of the Whois database.

Second, it would be very useful if registrars could be required to suspend a domain registration upon willful failure to provide accurate contact information or failure to correct inaccurate contact information until the accurate information is obtained. The current agreements leave cancellation of a domain registration in these circumstances to the registrar's discretion.

We believe it is worth examining whether registrars should have additional obligations to suspend registrations for failure to provide accurate information and to implement reasonable up-front verification procedures for accuracy of contact information that is provided.

Finally there are trade-offs between transparency of domain registrant information and personal privacy. The FTC has a unique perspective on these issues since we are a law enforcement agency that has committed substantial resources to protecting consumers' privacy. There are legitimate privacy interests at stake for Web sites, especially those developed for personal or for political reasons. At the same time, there are often legitimate reasons for making such information available to law enforcers and the public.

For commercial Web sites, we believe that the balance weighs heavily in favor of public disclosure of basic registrant contact information. Once a company decides to sell products on the Internet, it should be accountable to the public so the public can determine who the company is and where it operates from. The OECD guidelines on electronic commerce affirm these principles.

In conclusion, we look forward to working with this Subcommittee and all international stakeholders as they move forward to improve accuracy of Whois information. One important first step is to publicize the problem, and hearings such as this one are an important part of that process.

Thank you for the opportunity to participate.

Mr. COBLE. Thank you, Mr. Beales.

[The prepared statement of Mr. Beales follows:]

PREPARED STATEMENT OF HOWARD BEALES

Mr. Chairman, I am Howard Beales, Director of the Bureau of Consumer Protection at the Federal Trade Commission. I am pleased to be here today to discuss the importance of accurate domain registration information in the *Whois* database to our consumer protection mission.¹ As you know, the *Whois* database is the popular name for a combination of information directories containing registration information about website operators.

The FTC's consumer protection efforts include fighting Internet fraud. Because fraudulent website operators can defraud consumers quickly and disappear quickly, we need to move just as quickly to find them and stop them. The *Whois* database—when it is accurate—can help law enforcers quickly identify wrongdoers and their location, halt their conduct, and preserve money to return to defrauded consumers. Inaccurate *Whois* data, however, help Internet scam artists remain anonymous and stymie law enforcement efforts.²

The testimony will begin with a general overview of the FTC and its enforcement authority, the challenges we have faced in fighting Internet fraud, and how we work to overcome those challenges. Second, we will discuss the importance of the *Whois* database to these efforts and the problems we encounter when *Whois* information is inaccurate. Third, we will address current registrar practices with respect to *Whois* information. Finally, the testimony will close with a few words about the balancing of privacy interests of domain registrants and the interest of other stakeholders in the transparency of *Whois* information.

I. THE FTC'S FIGHT AGAINST INTERNET FRAUD

A. *The FTC's Law Enforcement Authority*

The FTC is an independent agency charged with protecting consumers and promoting a competitive marketplace. The cornerstone of the Commission's mandate is Section 5 of the Federal Trade Commission Act, which prohibits "unfair methods of competition" and "unfair or deceptive acts or practices."³ The FTC focuses on stopping actions that threaten consumers' opportunities to exercise informed choice. The FTC halts deception through civil actions filed by its own attorneys in federal district court, as well as through administrative cease and desist actions.⁴

B. *The Challenges Posed by Internet Fraud*

The Internet and e-commerce have seen dramatic growth. The number of American adults with Internet access has grown, by one estimate, from approximately 88 million in mid-2000 to more than 174 million in March 2002.⁵ The Census Bureau of the Department of Commerce estimated that in the fourth quarter of 2001, not

¹This written statement presents the views of the Federal Trade Commission. My oral statement and responses to questions are my own and are not necessarily those of the Commission or any individual Commissioner.

²The FTC's Bureau of Consumer Protection staff also filed a public comment with the ICANN DNSO Names Council on the importance of accurate *Whois* data for law enforcement purposes. See Letter of Howard Beales to Louis Touton dated August 6, 2001, re ICANN DNSO Names Council *Whois* Survey.

³15 U.S.C. § 41 *et seq.* The Commission has responsibilities under 40 additional statutes, including the Children's Online Privacy Protection Act of 1998, 15 U.S.C. § 6501 *et seq.*, which prohibits unfair and deceptive acts and practices in connection with the collection and use of personally identifiable information from and about children on the Internet. See www.ftc.gov/ogc/coppa1.pdf. The Commission also enforces over 30 rules governing specific industries and practices, including the Mail and Telephone Order Merchandise Rule, 16 C.F.R. Part 435, which covers purchases made over the Internet and spells out the ground rules for making promises about shipments, notifying consumers about unexpected delays, and refunding consumers' money. See www.access.gpo.gov/nara/cfr/waisidx—99/16cfr435—99.html.

⁴15 U.S.C. §§ 45(a) and 53(b).

⁵See Leslie Miller, "Web Growth Slows, But Online Time Rises," *USA Today*, March 28, 2002, available at www.usatoday.com/life/cyber/tech/2002/03/28/net-statistics.htm.

adjusted for seasonal, holiday, and trading-day differences, online U.S. retail sales were more than \$10 billion, an increase of 13.1 percent from the fourth quarter of 2000. Total e-commerce sales for 2001 were estimated at \$32.6 billion, an increase of 19.3 percent from 2000.⁶

Unfortunately, but not surprisingly, the e-commerce boom of the last several years has created fertile ground for fraud. In 2001, close to 50,000 complaints—roughly 41 percent of all complaints logged into the FTC’s fraud database, *Consumer Sentinel*, by various organizations that year—were Internet-related.⁷

There is real danger that the benefits of the Internet may not be fully realized if consumers identify the Internet with fraud operators. We need to act quickly to stop fraud, both to protect consumers and to protect consumer confidence in e-commerce. We have therefore made fighting Internet fraud a top priority. Since 1994, the FTC has brought more than 225 Internet-related law enforcement actions against 688 defendants and respondents, stopping consumer injury estimated at more than \$2.1 billion.

The Commission faces a host of novel challenges in its efforts to combat fraud and deception online. Traditional scams—such as pyramid schemes and false product claims—thrive on the Internet. A colorful, well-designed Web site imparts a sleek new veneer to an otherwise stale fraud; and the reach of the Internet also allows an old-time con artist to think—and act—globally. Moreover, the architecture of the Internet itself has given rise to new high-tech scams that were not possible before the development of the Internet. Both traditional scams and the innovative ones exploit the global reach and instantaneous speed of the Internet. In addition, the Internet enables con artists to cloak themselves in anonymity, which makes it necessary for law enforcement authorities to act much more quickly to stop newly-emerging deceptive schemes before the perpetrators disappear. And because the Internet transcends national boundaries, law enforcement authorities must be more creative and cooperative to successfully combat online fraud.

C. THE FTC’S EFFORTS TO FIGHT INTERNET FRAUD

Given the speed with which Internet fraudsters can con consumers, the Commission has worked to identify problems and go after perpetrators rapidly. In light of the challenges posed by the borderless nature of the Internet, the Commission has worked to gather information from international sources and cooperate with its foreign counterparts through multilateral and bilateral efforts. Some of the tools we have used to accomplish these goals include the following:

- *Databases:* To gather information quickly, the Commission has developed Consumer Sentinel, a web-based consumer complaint database that is accessible to more than 420 law enforcement organizations in the U.S., Canada and Australia.⁸ In 2001, numerous organizations in the U.S. and Canada contributed more than 200,000 consumer complaints to Consumer Sentinel.⁹ These complaints can help us identify trends and target fraudsters quickly and efficiently.
- *International Cooperation:* The Commission cooperates with its international counterparts to meet the challenges posed by cross-border fraud. The FTC is a member of the International Marketing Supervision Network (IMSN), a group of 30 consumer protection enforcement agencies that meets twice a year to discuss cross-border cooperation.¹⁰ Fifteen IMSN countries have launched econsumer.gov, a public website where consumers can file cross-border e-commerce complaints online that are accessible to law enforcement agencies in the member countries. The site is available in English, French, Spanish and German.¹¹ Complaints from econsumer.gov can help us identify trends and fraudsters on an international level. The FTC has also signed consumer pro-

⁶See U.S. Census Bureau, “Retail E-Commerce Sales in Fourth Quarter 2001 Were \$10.0 Billion, Up 13.1 Percent from Fourth Quarter 2000,” www.census.gov/mrts/www/current.html.

⁷This number represents an exponential growth in the number and percentage of Internet fraud-related complaints received in 1997, when the Commission received fewer than 1,000 Internet fraud complaints. See Prepared Statement of the Federal Trade Commission on “Internet Fraud,” Before the House Committee on Energy and Commerce, Subcommittee on Commerce, Trade and Consumer Protection, 107th Cong., 1st Sess. (May 23, 2001), available at www.ftc.gov/os/2001/05/internetfraudtmy.htm. For additional statistics from the *Consumer Sentinel* database, see www.consumer.gov/sentinel.

⁸See www.consumer.gov/sentinel.

⁹See www.consumer.gov/sentinel/trends.htm.

¹⁰For more information about the IMSN, see www.imsnricc.org.

¹¹See www.econsumer.gov.

tection cooperation agreements with Canada, the U.K. and Australia, which has enhanced our cooperation with these countries.¹²

- *Surf Days*: The Commission also coordinates law enforcement Surf Days to help identify international fraudsters. During a typical surf day, law enforcers at the federal, state, local and international levels “surf” the Internet for a specific type of claim or solicitation that is likely to violate the law. When a suspect site is identified, the page is downloaded and saved as potential evidence. Frequently, the operator of the site is sent a warning that explains the law and provides a link to educational information. Often, investigators obtain the e-mail or postal address from *Whois* information in order to send such warnings. A law enforcement team later revisits the previously warned sites to determine whether they have remedied their questionable claims or solicitations. Sites that continue to make unlawful claims are targeted for possible law enforcement action. Surf days achieve visible results: to date, more than 250 law enforcement agencies and consumer organizations around the world have joined the FTC in approximately 33 surf days; collectively, they have identified more than 6,000 Internet sites making dubious claims. In each of these efforts, a significant percentage of the Web site operators who received a warning came into compliance with the law, either by taking down their sites or by modifying their claims or solicitations.
- *Sweeps*: The FTC also coordinates law enforcement sweeps, both domestically and internationally, and here too *Whois* information can play an important role. In our experience, “sweeps” of a particular area can generate substantial publicity, which can in turn provide meaningful consumer education and further deter fraudulent conduct in that area. In “Operation Top Ten Dot Cons,” for example, law enforcement agencies from nine countries announced 251 law enforcement actions against online companies. More recently, the FTC announced earlier this month that it had joined forces with 12 other U.S. and Canadian agencies to form an International Netforce targeting deceptive spam and Internet fraud. The agencies brought 63 law enforcement actions against Web-based scams, ranging from auction fraud to bogus cancer cure sites, and sent more than 500 warning letters to senders of deceptive spam.¹³
- *Internet Training*: Recognizing that law enforcement officials have to be one step ahead of the technology used by scam artists, the FTC has also hosted Internet training seminars. Since FY 2001, the Commission has educated more than 1,750 law enforcement personnel from more than 20 countries, 38 states, 23 U.S. federal agencies, and 19 Canadian agencies.
- *Internet-Based Tools*: The Commission also provides its staff with the tools they need to investigate high-tech fraud quickly, anonymously, and efficiently. The FTC’s Internet Lab is an important example. With high speed computers that are separate from the agency’s network and equipped with current hardware and software, the Lab allows staff to investigate fraud and deception in a secure environment and to preserve evidence for litigation. Staff often conducts *Whois* searches in the Internet lab.

III. THE IMPORTANCE OF WHOIS DATA

You have asked us to discuss the importance of accurate *Whois* data to our work. Such a discussion necessarily takes place against the backdrop of discussions about ICANN reform. Interested stakeholders are actively discussing various reform proposals.

It is hard to overstate the importance of accurate *Whois* data to our Internet investigations. In all of our investigations against Internet companies, one of the first tools FTC investigators use to identify wrongdoers is the *Whois* database. We cannot easily sue fraudsters if we cannot find them. We cannot even determine which agen-

¹² See *Agreement Between the Government of the United States of America and the Government of Canada Regarding the Application of their Competition and Deceptive Marketing Practices Laws*, Trade Reg. Rep. (CCH) ¶13,503 (1995); *Agreement Between the Federal Trade Commission of the United States of America and the Australian Competition & Consumer Commission On the Mutual Enforcement Assistance in Consumer Protection Matters* (July 20, 1999), www.ftc.gov/opa/2000/07/usacc.htm; *Memorandum Of Understanding On Mutual Enforcement Assistance In Consumer Protection Matters Between The Federal Trade Commission Of The United States of America And Her Majesty’s Secretary of State for Trade And Industry And The Director General Of Fair Trading In The United Kingdom* (October 31, 2000), www.ftc.gov/opa/2000/10/ukimsn.htm.

¹³ Information on “Operation Top Ten Dot Cons” (October 21, 2000) is available at www.ftc.gov/opa/2000/10/topten.htm; information on the International Netforce project (April 2, 2002) is available at www.ftc.gov/opa/2002/04/spam.htm.

cy can best pursue them if we are unable to figure out the country in which they are located.

The pace of Internet fraud makes it necessary to obtain rapidly the basic identifying information about the operator of a website. The existing *Whois* database does not serve this function as well as it could. Indeed, one survey on e-commerce issues by the Australian Taxation Office found that 10 to 15 percent of the data in the *Whois* database is inaccurate.¹⁴

A. *FTC Experience with Inaccurate Whois Data*

FTC investigations are being hampered by registration information that is not only false, but sometimes blatantly so. For example, *Whois* information for “taboosisters.com,” a website targeted in *FTC v. Pereira*,¹⁵ indicated that the domain name was registered to a company located at “4 Skin” Street in Amsterdam, with “Amanda Hugandkiss” listed as the administrative contact. In *FTC v. J.K. Publications, Inc.*,¹⁶ a *Whois* query for a website operated by the defendants provided a street address of “here there, ca 10001” for the administrative and technical contacts.

These examples do not appear to be isolated incidents. An informal sampling of *Whois* queries conducted by FTC staff turned up a number of domain names with facially false address information registered to “hacker,” “FBI,” “Bill Clinton,” “Mickey Mouse,” and “God.” Several recent searches have turned up false phone numbers such as 555 555-5555 and 888 888-8888. One recent search for *Whois* information listed the organization, administrative, technical and zone contact as “xxxxxxxxxxxxxx.” Another listed U.S. address information for a business that in fact operated from another continent.

Besides hampering our law enforcement investigations, inaccurate *Whois* data decreases the effectiveness of our Surf Days. As described above, the FTC and its law enforcement partners often “surf” the Internet for particular types of claims and send warning messages to sites that make potentially deceptive or misleading claims, following up later to determine if enforcement action is appropriate. Surfers rely on *Whois* data to find addresses for this purpose. If the *Whois* data are not accurate, the utility of the Surf Day as a law enforcement tool is diluted.

Problems with inaccurate *Whois* data were illustrated in a surf conducted by the FTC and its law enforcement partners in connection with the recent “International Netforce” initiative described above. One part of this initiative was a surf to test compliance with “remove me” or “unsubscribe” options.¹⁷

The object of the surf was to test whether “remove me” or “unsubscribe” options in spam were being honored. From e-mail forwarded to the FTC’s database of unsolicited commercial e-mails by the participating agencies, we culled more than 200 e-mails that purported to allow recipients to remove their name from a spam list. The agencies set up dummy e-mail accounts to test the pledges. We discovered that most of the addresses to which they sent the requests were invalid. Most of the “remove me” requests did not get through. Based on information gathered, the FTC sent 77 letters warning spammers that deceptive “removal” claims in unsolicited e-mail are illegal. We sent the letters to addresses listed in the *Whois* database. Interestingly, 16 of the 77 letters, or approximately 21 percent, were sent back to us because the addresses we obtained from the *Whois* database were inaccurate. We have notified the registrars of this inaccuracy and have encouraged them to take appropriate action.¹⁸

The importance of law enforcement officials having access to accurate contact information for commercial website operators has also been recognized internationally. In 1999, the Organization for Economic Cooperation and Development (OECD), an international organization consisting of 30 countries, issued consensus Guidelines on Consumer Protection in Electronic Commerce. These Guidelines recommend that “businesses engaged in electronic commerce with consumers should provide accurate, clear and easily accessible information about themselves sufficient to allow, at a minimum . . . location of the business and its principals by law enforcement and

¹⁴ Cited in Thomas Fuller, “OECD’s Cautionary Tale of Porn and Cyberspace,” *International Herald Tribune* at 1 (April 3, 2002), available at www.iht.com/articles/53353.html.

¹⁵ CV-99-1367-A (E.D.Va. filed Sept. 14, 1999)(Preliminary Injunction entered Sept. 21, 1999). See www.ftc.gov/os/1999/9909/index.htm#22.

¹⁶ Civ. No. 99-000-44ABC (AJWx) (C.D. Cal.).

¹⁷ Many of these initiatives were generated by the FTC’s database of unsolicited commercial e-mail (UCE or spam). Consumers currently send unwanted spam to the agency at a rate of approximately 35,000 e-mails a day using the agency’s database address, uce@ftc.gov. The FTC has collected more than 10 million unwanted spam messages since 1998.

¹⁸ See <http://www.ftc.gov/opa/2002/04/spam.htm>.

regulatory officials.”¹⁹ Where this information is not provided on the registered websites, the *Whois* database can provide an important supplementary resource for law enforcers.

B. REGISTRAR RESPONSIVENESS

The problem of inaccurate *Whois* information is compounded when registrars fail to act promptly to suspend domain names registered by registrants who have willfully provided inaccurate contact information. Under Registrar Accreditation Agreements between registrars and ICANN, registrars must collect contact information from registrants and post such information on a *Whois* service.²⁰ Suspension of a domain name for willful failure to provide accurate contact information is within the discretion of the registrar.²¹ However, registrars have little incentive to suspend a domain name. Their failure to suspend a domain name can allow anonymous fraudsters to remain online and have their sites viewed by thousands of consumers in a short period of time.

Here is an anecdote illustrating how difficult it can be to suspend a domain name. At the most recent meeting of the OECD’s Committee on Consumer Policy, which FTC Commissioner Mozelle Thompson now chairs, OECD staff presented a paper on its experience trying to contact a cybersquatter.²² The OECD had let its registration for its French language site www.oecd.org lapse. A cybersquatter bought the domain name and used it to post a pornographic site with an offer to sell the domain name.²³ The *Whois* database indicated that the site had been registered by “Domain For Sale,” located in Armenia, but the administrative and technical contact was an employee of the American Institute of Architects in Washington, D.C. The OECD called this individual and found that Domain For Sale had falsely listed him as a contact. The OECD demonstrated to the registrar that Domain For Sale had willfully provided false contact information. Rather than suspend Domain For Sale’s registration, the registrar sent an e-mail to Domain For Sale, giving it fifteen days to correct its registration.

Domain For Sale modified its registration information, but the new information was on its face incomplete, as it did not list a person as a contact for the company, in violation of the Registrar Accreditation Agreement.²⁴ The registrar offered to de-register Domain For Sale only if OECD would indemnify the registrar for any breach of contract claim, the registrar’s legal expenses in responding to OECD’s complaint, and two years potential loss of registration business from Domain For Sale, which had 113 registrations with that particular registrar. The OECD refused and submitted affidavits from Armenian government officials stating that there was no legal entity registered at the address Domain For Sale had listed as its contact information. Only after some additional correspondence between the OECD and the registrar over a period of about one month was the registrar prepared to return the name to the OECD.

According to the OECD, the registrar failed to suspend the registration even after the OECD had twice shown that the registrant willfully submitted false contact information. Thus, OECD did not have access to www.oecd.org for almost two months.²⁵ By analogy, if a fraudulent website remains posted for a two-month period, it could cause consumers substantial injury.

IV. CURRENT REGISTRAR PRACTICES WITH RESPECT TO *WHOIS* INFORMATION

Current registrar practices with respect to accuracy of *Whois* information vary, depending on the type of registrar at issue. All registrars for generic Top Level Do-

¹⁹*Guidelines on Consumer Protection in the Context of Electronic Commerce*, Part Two, Section III(A), OECD (December 9, 1999) available at www.ftc.gov/opa/1999/9912/oecdguide.htm.

²⁰ICANN Registrar Accreditation Agreement, May 17 2001, §3.3.1, www.icann.org/registrars/ra-agreement-17may01.htm.

²¹*Id.* at §3.7.7.2.

²²Cybersquatting means registering, trafficking in, or using a domain name with bad-faith intent to profit from the goodwill of a trademark belonging to someone else. It refers to the practice of buying up domain names reflecting the names of existing businesses, intending to sell the names for a profit back to the businesses when they go to put up their websites. See <http://www.nolo.com/lawcenter/ency/article.cfm/objectID/60EC3491-B4B5-4A98-BB6E6632A2> FA0CB2. For an FTC case involving cybersquatting, see *FTC v. Zuccarini*, C.A. No. 01–CV–4854 (E.D. Pa., filed Sept. 25, 2001), available at <http://www.ftc.gov/opa/2001/10/cupcake.htm>.

²³See *Cybersquatting—The OECD’s Own Experience and the Problems It Illustrates with Registrar Practices and the “Whois” System*, OECD Directorate for Science, Technology and Industry, Committee on Information, Computer and Communications Policy, DSTI/ICCP(2002)8 (2002), available at www.oecd.org/pdf/M00027000/M00027316.pdf.

²⁴See *supra* note 20 at §3.7.7.1.

²⁵See *supra* note 14.

mains (gTLDs), including .com, .net, .org, .biz, .info and .name, are required to comply with ICANN's Registrar Accreditation Agreement.²⁶ This Agreement contains provisions requiring registrars to collect accurate contact information from registrants and post such information on a *Whois* site. ICANN does not currently have any contractual provisions in place for most country code Top Level Domains (ccTLDs), such as .uk for the United Kingdom or .de for Germany. Registrar practices for these ccTLDs vary widely.²⁷ The following discusses each of these areas in turn.

A. Generic TLDs

ICANN's Registrar Accreditation Agreements with the gTLD registrars include some noteworthy provisions that illustrate ICANN recognition of the benefits of accurate *Whois* data. For example, the Agreement specifies that "a Registered Name Holder's willful provision of inaccurate or unreliable information, its willful failure promptly to update information provided to Registrar, or its failure to respond for more than fifteen calendar days to inquiries by Registrar concerning the accuracy of contact details associated with the Registered Name Holder's registration shall constitute a material breach of the Registered Name Holder-registrar contract and be a basis for cancellation of the Registered Name registration."²⁸ The Accreditation Agreement also requires that, if registrars are notified of an inaccuracy in the registration information, they should "take reasonable steps to investigate that claimed inaccuracy."²⁹

The FTC Bureau of Consumer Protection letter to the ICANN DNSO Names Council dated August 6, 2001, mentioned earlier, had asked ICANN to work with registrars to implement and enforce the provisions of its Registrar Accreditation Agreement that ensure the completeness and accuracy of *Whois* data. There is some room for improvement in the Registrar Accreditation Agreements that could address our concerns.³⁰

First, it would be extremely useful if registrars would weed out blank or incomplete registration forms, as well as some of the obviously false information that undermines the integrity of the *Whois* database. Second, it would very be useful to us if registrars could be required to suspend a domain registration upon willful failure to provide accurate contact information, or failure to correct inaccurate contact information, until accurate information is obtained. The current ICANN Registrar Accreditation Agreements leave cancellation of a domain registration in these circumstances to the registrar's discretion.³¹ This policy is problematic for two important reasons. As noted above, registrars have little incentive to suspend a domain name. Without a suspension requirement, scam artists are free to perpetrate fraud anonymously. In addition, registrars that adopt relaxed policies on accurate contact information may attract businesses seeking anonymity, creating havens for bad actors to shield their true identity from law enforcement and others. The OECD experience described above shows the consequences of lack of registrar cooperation: when registrars refuse to suspend domain registrations, websites operating for nefarious purposes can continue to operate on the Internet unchecked.

Although the Registrar Accreditation Agreements contain many important provisions for ensuring accuracy of domain registration information, these provisions have not solved the problem of inaccurate data described above. We believe it is worth examining whether registrars should have additional obligations to suspend registrations for failure to provide accurate information under Section 3.7.7.2 of the Registrar Accreditation Agreement and to implement reasonable up-front verification procedures for accuracy of contact information provided.³²

²⁶ See *supra* note 20.

²⁷ Two letter domains, such as .uk, .de and .jp (for example), are called country code top level domains (ccTLDs) and correspond to a country, territory, or other geographic location. The rules and policies for registering domain names in the ccTLDs vary significantly and some are reserved for use by citizens of the corresponding country. See ICANN Frequently Asked Questions, available at www.icann.org/general/faq1.htm.

²⁸ See *supra* note 20 at § 3.7.7.2.

²⁹ See *supra* note 20 at § 3.7.8.

³⁰ Of course, as noted above, exactly what might be done will depend on whether and to what extent the structure of ICANN is changed as a result of the reform process.

³¹ See *supra* note 20 at § 3.7.7.2 (stating that a registrant's willful failure to provide accurate contact details shall "be a basis for cancellation of the Registered Name registration.")

³² The Commission recognizes that the proposed measures are not a cure-all. They would not, for example, limit in any way the ability of a registrant who has had a domain name terminated to register new domain names.

B. Country-Code TLDs

Websites operating from the two-letter country-code top-level domains (ccTLDs) are likely to become increasingly important to our Internet fraud efforts. Websites operating from ccTLDs are viewable by U.S. consumers, and an increasing number of our actions involve foreign-based websites targeting U.S. consumers.

Registration of domain names within ccTLDs is administered by country-code registry managers. The rules and policies for registering domain names in the ccTLDs vary significantly, and the ccTLD registry managers do not have uniform rules on collection and publication of contact information for domain registrants.³³ Thus, the policies on disclosure of *Whois* information for domains registered with ccTLDs vary widely, and unavailability of such information can hinder our investigations. For example, the public *Whois* database for the .uk TLD (United Kingdom) only provides name of the registrar and no contact information for the domain registrant.³⁴ The .ie (Ireland) public *Whois* service only provides the name of the person who registered the website, but no contact information.³⁵ The .cn *Whois* service for China provides virtually no public information.³⁶

ICANN's existing ccTLD Sponsorship Agreements with Australia and Japan state that ccTLD registry managers should obtain, maintain and provide public access to accurate and up-to-date contact information for domain name registrants consistent with ICANN policies.³⁷ Neither of these agreements prescribes detailed rules for what information should be collected and what information should be published. The Australian ccTLD registry manager seems to provide contact information, including name, address, telephone number, fax number and e-mail address, for the registrant, whereas the Japanese ccTLD registry manager seems to only provide the name of the registrant.³⁸ ICANN's model ccTLD Sponsorship Agreement and ICANN's Governmental Advisory Committee Principles for Delegation and Administration of ccTLDs Presented contain the same provision as the .jp (Japan) and .au (Australia) ccTLD sponsorship agreements on public access to contact information of registrants.³⁹

It would be extremely useful for our law enforcement purposes for the ccTLD registry managers to implement measures to improve accuracy and accessibility of *Whois* data for ccTLD registrants. For the reasons that we have outlined, we will continue to work with businesses, consumer groups, governments, international organizations and other stakeholders to advocate internationally the importance of collecting accurate contact details for ccTLD registrants to assist law enforcers in their efforts to protect consumers from Internet fraud.⁴⁰

V. PRIVACY ISSUES

Finally, there are tradeoffs between transparency of domain registrant information and personal privacy. The FTC has a unique perspective on these issues, given that we are a law enforcement agency that has committed substantial resources to protecting consumers' privacy.⁴¹ There are legitimate privacy interests at stake for websites, especially those developed for personal or political purposes. At the same

³³ See www.icann.org/cctlds for more information about ccTLDs.

³⁴ See www.nic.uk.

³⁵ See www.domainregistry.ie.

³⁶ See www.cnnic.net.cn. U.S. law enforcement efforts against websites with country-code TLDs is made more difficult by the fact that it is extremely difficult, and in some cases, virtually impossible to enforce a subpoena against a foreign registrar requesting additional information about a registrant.

³⁷ See .jp ccTLD Sponsorship Agreement (April 1, 2002), at § 4.5.1, www.icann.org/cctlds/jp; see .au ccTLD Sponsorship Agreement (October 25, 2001), at § 4.5.1, www.icann.org/cctlds/au/sponsorship-agmt-25oct01.htm

³⁸ See <http://www.aunic.net>; see <http://jprs.jp/eng>.

³⁹ See Model ccTLD Sponsorship Agreement—Triangular Situation, Posted September 2, 2000, at 4.5.1, available at www.icann.org/cctlds/model-tscsa-02sep01.htm, Principles for Delegation and Administration of ccTLDs Presented by Governmental Advisory Committee (23 February 2000), www.icann.org/committees/gac/gac-cctldprinciples-23feb00.htm.

⁴⁰ Although these comments here focus largely on data accuracy and integrity, there are also a number of related issues, such as the scope of information collected and the searchability of that information. For a further discussion of these issues, see FTC Bureau of Consumer Protection letter to Louis Touton, *supra* note 2. We plan to examine these issues as well with the relevant international stakeholders.

⁴¹ Our initiatives in this area include beefing up enforcement against deceptive spam, helping victims of identity theft, enforcing privacy promises, increasing enforcement and outreach on children's online privacy, and encouraging consumers to report privacy complaints. See www.ftc.gov/privacy/index.html.

time, there are often legitimate reasons for making such information available to law enforcers and/or the public.

For commercial websites, we believe the balance weighs in favor of public disclosure of basic registrant contact information. Once a company decides to sell products on the Internet, it should be accountable to the public so that the public can determine who the company is and where it operates from. The OECD Guidelines on Electronic Commerce cited above affirm these principles. The Guidelines state that consumers should have information about commercial websites “sufficient to allow, at a minimum, identification of the business . . . [and] prompt, easy and effective consumer communication with the business.”⁴² This provision represents a consensus among the 30 member countries of the OECD as to the minimum information that consumers should be able to obtain about businesses operating websites. Because some online businesses do not provide sufficient identifying information on their websites, *Whois* information can provide consumers with a useful supplement.

With respect to websites registered by individuals, such as websites registered under the .name Top Level Domain,⁴³ or websites registered for non-commercial purposes, there are different considerations to balance. On one hand, these individuals and website operators have legitimate privacy concerns. On the other hand, a fraudster should not be permitted to hide from law enforcement authorities simply by registering under the .name TLD or by claiming registration for non-commercial purposes. It is also important in this context to consider both the question of what disclosure to the public is warranted and the question of what disclosure to law enforcement is warranted. We are continuing to work through international organizations, businesses and consumer groups to develop workable solutions that balance the privacy interests with the interests in transparency of *Whois* data.⁴⁴

VI. CONCLUSION

In short, our Internet fraud enforcement efforts require quick identification of problems, quick identification of perpetrators, and the ability to gather information about international entities and organizations. Accurate *Whois* data is essential to these efforts, and inaccurate data can significantly frustrate them. We look forward to continuing to work with this Subcommittee and all international stakeholders toward improving accuracy of *Whois* information.

Mr. Chairman, the FTC greatly appreciates this opportunity to testify. I would be happy to answer any questions that you and other Members may have.

Mr. COBLE. Mr. Metalitz.

STATEMENT OF STEVEN J. METALITZ, SMITH & METALITZ, LLP, ON BEHALF OF COPYRIGHT COALITION ON DOMAIN NAMES

Mr. METALITZ. Thank you, Mr. Chairman, Mr. Berman, Members of the Subcommittee. I appreciate this opportunity to present the views of the Copyright Coalition on Domain Names, and I want to thank you for once again using the oversight jurisdiction of this Subcommittee to spotlight some of the problems with the Whois database.

Mr. Beales has already talked about what the Whois database is and how it is used in enforcement of consumer protection laws. We have a similar story to tell with regard to enforcement of the copyright laws.

The copyright industries, as this Subcommittee knows, are an extremely important part of the U.S. economy, growing faster than—much faster than the rest of the economy. This industry threatened by online piracy, and a key tool that we use to combat online piracy is Whois. This is the feature of the domain name system that

⁴²*Guidelines for Consumer Protection in the Context of Electronic Commerce*, OECD, December 9, 1999, Part Two, § 3(a), available at www.ftc.gov/opa/1999/9912/oecdguide.htm.

⁴³The .name TLD is reserved for registrations by individuals.

⁴⁴We acknowledge that requiring all registrars to police whether a site is being registered for commercial or non-commercial purposes may impose undue costs on registrars. We will take into account this concern in our further consideration of these issues.

makes available contact data on those who register domain names. We also use it to implement the notice and take-down procedures of the Digital Millennium Copyright Act, which originated in this Subcommittee 4 years ago.

It is no exaggeration to say that all Internet users need Whois, and they need it because it helps to provide the transparency and accountability on the Internet that is needed to build consumer confidence in this medium of electronic commerce. But Whois can't do its job if the data it contains is false, incomplete, inaccurate or out of date; and all too often all of those adjectives apply. Mr. Beales has given several examples, we have some in our testimony, and I am sure the other witnesses will provide them as well. So I won't go through the gory details of some of these. But I think it is clear, as Mr. Beales has said, that it is not an isolated problem.

Now, most Whois data is accurate. The problem is that, among the small minority of domain name registrants who are up to no good, whether they are cyberpirates or cybersquatters on trademark names or they are carrying out consumer fraud, they face no impediment whatever to submitting false Whois data; and they face virtually no adverse consequences for doing so. This is the reason why the data quality in Whois is so poor today. Obviously, this is the fault of registrants who are submitting false contact data, but this data is being accepted without any question or without any attempt at verification.

In the legacy top-level domains, by which I mean dot com, dot net, and dot org, and that is the focus of the statement, this responsibility rests on the registrars. As Mr. Beales has pointed out, there are provisions in the agreements that every registrar, all 150 or so of them, have signed with ICANN that require them to take some steps to improve data quality, to screen out bad contact data and to respond promptly to complaints about bad contact data and to revoke the registrations of those who submit it.

It is painfully obvious that these legal obligations are not being met. Most registrars do not seem to have established a mechanism for even receiving complaints of false contact data.

Some registrars have very recently taken steps to reverify some of the Whois data, but that is not a widespread practice. The sanction provided by the agreements for this behavior, cancellation of the domain name registration, is almost never applied; and, as we understand the results of the survey that this Subcommittee undertook, the results you received were the same as what we are seeing here.

It is hard to escape the conclusion that most registrars don't care about the quality of the Whois data they collect, and they feel under no compulsion to improve it or even to respond to questions even from this Subcommittee about it. This is also borne out by some of these studies that we referenced in our testimony from the OECD and from the ICANN's own domain name support organization.

So what should be done about this problem? Well, on the registrar's side, we think there is a three-point plan that they have to adopt. They have to screen out the bad data, they have to check

out the data that they have received, and they have to toss out of their registries the entities that are submitting bad contact data.

They could do this all voluntarily. Unfortunately, so far there is little indication that they are interested in pursuing this course.

Legislation is certainly one option that ought to be considered, but we have to look very carefully at what the consequences of that legislation might be.

I think at this point the buck stops with ICANN. ICANN has entered into these agreements. It is past time for it to enforce these agreements. In the past 2 weeks since this hearing was announced, ICANN has issued a registrar advisory that tries to spell out what the ICANN accredited registrars are supposed to do in this area. We think it leaves a great deal to be desired, but it certainly is a good first step.

ICANN right now is undergoing a restructuring and reform debate, and one key issue there is the confidence of governments in the work of ICANN. I think one of the things ICANN can do to bolster that confidence is to really take some proactive steps to enforce the agreements it has entered into with these registrars and to move to clean up the Whois database.

Thank you very much.

Mr. COBLE. Thank you, Mr. Metalitz.

[The prepared statement of Mr. Metalitz follows:]

PREPARED STATEMENT OF STEVEN J. METALITZ

Chairman Coble, Representative Berman, and members of the Subcommittee:

Thank you for this opportunity to present the views of the Copyright Coalition on Domain Names (CCDN) on the accuracy and integrity of Whois data. Since 1999, our coalition has brought together the leading organizations representing copyright owners, whose common goal is to preserve and enhance the critical role of the domain name registration system in combating the scourge of online copyright piracy and promoting legitimate electronic commerce in works of authorship. CCDN participants include leading industry trade associations such as the Business Software Alliance (BSA), the Motion Picture Association of America (MPAA), the Recording Industry Association of America (RIAA), and the Software and Information Industry Association (SIIA); the two largest organizations administering the performance right in musical compositions, ASCAP and BMI; and major copyright-owning companies such as AOL Time Warner and the Walt Disney Company. I appear this morning as counsel to CCDN.

I also serve as president of the Intellectual Property Constituency (IPC), the international group organized under the auspices of the Internet Corporation for Assigned Names and Numbers (ICANN) and its Domain Names Supporting Organization, to advise ICANN on intellectual property issues generally, including trademark as well as copyright matters. While this testimony has not been formally approved by the IPC, it is consistent with the public policy positions that group has taken.

Before turning to the specific issue which is the focus of this morning's hearing, may I first express our appreciation to the members of this Subcommittee, and especially its leadership, Mr. Coble and Mr. Berman, for your wise stewardship of the U.S. copyright law and your leadership in ensuring that American creativity is fostered through strong copyright protection and effective enforcement, both here and abroad. That stewardship and leadership are important ingredients that have allowed the U.S. copyright industries to contribute so much to the U.S. economy and global competitiveness. The numbers in the latest economic study issued last month by the International Intellectual Property Alliance (IIPA) tell a powerful story about the copyright industries: nearly five million U.S. jobs, more than half a trillion dollars contributed to Gross Domestic Product, and close to \$90 billion in exports and foreign sales, a new record and far more than almost any other industry sector. The story behind that story is the work of this subcommittee, both in keeping copyright law up to date with technological changes - most recently through enactment of the Digital Millennium Copyright Act (DMCA) in 1998 - and in conducting careful oversight of its enforcement.

WHOIS: ITS IMPORTANCE TO COPYRIGHT OWNERS AND ALL INTERNET USERS

As this subcommittee knows only too well, online piracy of all kinds of copyrighted material poses a real danger to the remarkable U.S. success story summarized in the latest IIPA statistics. A key tool that intellectual property owners use to combat online piracy and cybersquatting is called "Whois." This feature of the domain name system makes available the contact data on those who register domain names. Every pirate site has an address on the Internet; and through Whois and similar databases, virtually every Internet address can be linked to contact information about the party who registered the domain name corresponding to the site; about the party who hosts the site; or the party who provides connectivity to it.

Copyright owners use this critical information in a number of ways to protect their intellectual property. Sometimes we approach the site operator directly, with a demand that piratical activity cease. In the case of unauthorized public performances and other uses of musical compositions, ASCAP and BMI generally contact the site operator and offer a license to cover those performances or uses, which provides a means for the operator to avoid further liability. Sometimes Whois data is used primarily to correlate the activity at one pirate site with another that may be registered by the same or a related entity. This information is compiled for later use in civil or criminal enforcement proceedings, including settlement discussions. But perhaps the most important use of Whois data is to enable the operation of a key element of the DMCA, the "notice and takedown" procedure provided by 17 USC § 512.

As you know, under notice and takedown, the copyright owner (or its representative) notifies an Internet Service Provider (ISP) of infringing activity taking place on a site which the ISP hosts or to which it provides connectivity. The DMCA gives the ISP a strong incentive, in the form of sharply reduced exposure to legal remedies, if it expeditiously "takes down" or cuts off access to the site in question. Over the past three and one-half years, notice and takedown, whether carried out strictly within the steps set out in the DMCA or through more informal channels, has been an effective means by which copyright owners and responsible ISPs have cooperated to combat online piracy. This mechanism, which has been successfully invoked tens of thousands of times since enactment of the DMCA, could not function properly without ready access to Whois information. Whois and related DNS directory services allow copyright owners quickly and reliably to identify the ISP to whom a DMCA notification should be directed in order to start the notice and takedown procedure. Without accurate and accessible Whois data, it would be much more difficult for copyright owners to find out who is the proper recipient of a DMCA notification in a timely and cost effective manner.

I certainly don't want to give the impression that copyright owners are the only ones who are concerned about public access to Whois. Nothing could be further from the truth. Access to domain name registrant contact data is critical to trademark owners as well, in their efforts to combat cybersquatting and the promotion of counterfeit products online. In addition, the value of unrestricted public access to Whois data extends far beyond the intellectual property arena, into network operations and security functions, consumer protection, law enforcement, and protection of children from inappropriate online content. It is no exaggeration to say that *all Internet users need WHOIS* to provide essential transparency and accountability on the Internet. If the Internet is to thrive as a medium for legitimate commerce and for ubiquitous communication, we all have a stake in preserving and enhancing unrestricted public access to Whois.

THE PROBLEM OF WHOIS DATA QUALITY

But Whois cannot perform these critical functions if the data it contains is false, incomplete, inaccurate, or out of date. Anyone who is familiar with the Whois database knows the problems with Whois data quality. All too often, the data we access in Whois is clearly bogus on a first glance, listing fictitious cities, states and countries, phone numbers consisting entirely of letters or repeated "5"'s, and the like. In even more cases, the most rudimentary investigation would demonstrate the falsity of Whois data.

Let me provide just a couple of examples. The first concerns the domain name for a site purporting to make available a product that will allow the unrestricted copying of commercially released DVD's - a blatant violation of the DMCA. In Whois, the registrant lists its name and address as follows:

DVD Copy HQ
1000 Lavaland LN
1Flabberville, CA 90807 USA

A brief visit to a resource such as *www.whitepages.com* reveals, within seconds, that there is no Flabberville, CA, and no Lavaland Lane in the city (Long Beach, CA) corresponding to the zip code provided. This clearly false contact data accepted by the domain name registrar means that Whois cannot, in this instance, fulfill the important function of providing transparency and accountability for intellectual property owners, consumers, law enforcement officials, and others who would have a very lively interest in tracking down the party committing these illegal acts.

The second example involves the efforts of the Organization for Economic Cooperation and Development (OECD) to recover the domain name corresponding to the French-language version of its acronym - *ocde.org* - after a registrar mistakenly cancelled its registration by OECD and a second registrar allowed a pornographer and cybersquatter to take it over. It took the OECD, a prestigious intergovernmental organization that brings together virtually the entire developed world, two months and considerable expenditure of staff and outside counsel resources before it was able to reclaim the pilfered domain name. I will not repeat the full tale here, which involves a registrant who apparently hijacked not only the domain name, but also the contact information of a number of innocent bystanders, such as an Armenian family in Yerevan and a Washington, DC professional association executive, which he submitted to Whois in connection with his registration. This registrant was a serial Whois abuser, whose victims included (according to OECD's investigation) "Hewlett Packard, ESPN, a small town in Idaho, a former San Francisco Forty-Niners quarterback, an Australian football club, children's web sites in the US and Italy, [and] a chemistry professionals' discussion site." I encourage subcommittee members to visit <http://www.oecd.org/pdf/M00027000/M00027316.pdf> to review all the gory details.

I want to emphasize that bogus Whois data is the exception, not the rule. Just as the vast majority of domain name registrants are perfectly legitimate entities and individuals who use their Internet presence in completely unobjectionable ways, so most registrants provide accurate and complete Whois data and make reasonable efforts to keep it up to date. The problem is that among the small minority of domain name registrants who are up to no good - whether they are cybersquatters, copyright pirates, or perpetrators of other kinds of online scams, rip-offs or crimes - there is no impediment whatever to the submission of false Whois data, and virtually no adverse consequences for doing so. It is no surprise, therefore, that within this small minority of Whois abusers we find a disproportionate number of those who establish an online presence for illegitimate, malign and illegal purposes.

WHOIS DATA QUALITY: WHO IS RESPONSIBLE?

It is time to pose our own Whois question: Who is responsible for the deplorable data quality of Whois? In the first instance, of course, it is domain name registrants who are submitting blatantly false data. But that data is being accepted without question or any attempt at verification. The party responsible for this critical omission varies depending on the Top Level Domain (TLD) in question.

- In the so-called legacy Top Level Domains - *.com*, *.net* and *.org* - the registrars, who are accredited by ICANN, not only collect registrant contact data at the time a domain name is registered, but are also responsible for maintaining, and providing access to, a Whois database containing that information on their registrants.
- In the new Top Level Domains created by ICANN over the past two years - such as *.info*, *.biz* and *.name* - contact data is collected by the registrars, but is transmitted to the TLD registry, the keeper of the authoritative database of registrations throughout the particular TLD in question. In these environments, it is the registry that is responsible for maintaining and providing public access to a centralized Whois database covering the entire TLD.
- Finally, in the country code TLDs - the two-letter suffixes corresponding to one of more than 250 countries, territories, or other recognized geographic entities - Whois practices vary widely, not only as to which party collects and maintains registrant contact data, but also as to whether these data are entered into a Whois database and whether that database is accessible to the public.

For simplicity, in this statement we focus on the situation in the legacy TLDs, which account for the vast majority of domain name registrations.

THE ROLE OF ACCREDITED DOMAIN NAME REGISTRARS

As I have already noted, domain name registrars must be accredited, and must enter into a Registrar Accreditation Agreement (RAA) with ICANN. The RAA con-

tains several provisions dealing with Whois data quality. Section 3.7.7.1 requires domain name registrants to give the Registrar, at the time of registration, "accurate and reliable contact details, and [to] promptly correct and update them during the term of . . . registration." Section 3.7.7.2 makes willful breaches of this obligation "a basis for cancellation of the . . . registration." Section 3.7.8 of the RAA adds two other critical obligations. First, it requires registrars to "take reasonable steps to investigate" claims of inaccurate Whois data when they are brought to their attention "by any person," and to "take reasonable steps to correct" any inaccuracy in registrant contact data of which the registrar learns. Second, this provision empowers ICANN to establish "specifications or policies . . . requiring reasonable and commercially practicable (a) verification, at the time of registration, of contact information . . . or (b) periodic re-verification of such information." Registrars are required, under this provision of the RAA to "abide by" any such ICANN-established policies.

It is painfully obvious that these legal obligations are not being met. While registrars may be telling registrants that they must provide and keep current accurate contact data, they seem to be doing virtually nothing to enforce this obligation. Most registrars do not seem to have established any mechanism for even receiving complaints of false contact data, much less acting on such complaints, as the RAA requires them to do. One or more registrars seem to have very recently taken some steps to re-verify some Whois data, but the practice does not appear to be routine or widespread. Even though the Whois databases of many registrars are replete with blatantly bogus contact data that must have been supplied willfully, the sanction provided by the RAA for such behavior - cancellation of the domain name registration associated with the false data - is almost never applied. And until this past week, ICANN had neither issued any policies to facilitate the improvement of Whois data quality, nor taken any proactive steps to enforce the Whois data quality obligations that registrars are already subject to under the RAA.

As we understand it, the results of the survey of U.S.-based accredited registrars undertaken by this Subcommittee confirm this dismal picture. Two years ago, after the first registrars were accredited by ICANN under RAA's that contained nearly identical obligations, CCDN attempted to survey all accredited registrars on this issue, asking them, for example, to identify their contact person for receiving complaints of false Whois data. Only one registrar even bothered to respond to CCDN. We understand that the response rate even to a questionnaire issued by a subcommittee of the U.S. House of Representatives was not much better. It is hard to escape the conclusion that most registrars don't care about the quality of the Whois data they collect and make available, and feel under no compulsion to improve it or even to respond to questions about it.

CCDN would like to direct the subcommittee's attention to two other reports that may shed some light on the Whois data quality problem. First, I will refer again to the OECD's report. A recurring theme of this saga is the profound indifference of the registrar to the fact that the new registrant supplied clearly false contact data, and the persistent reluctance of the registrar to take any action to exercise its power under the RAA to cancel the registration so the OECD could reclaim it. Unfortunately, the OECD's story does not appear to be atypical. As the OECD paper concludes, "The system provides no incentive for the registrar to exercise any degree of diligence or to help reduce the victim's period of losses or recovery costs, even when its contract gives it every ability to do so."

Second, an online survey undertaken by a task force of ICANN's Domain Name Supporting Organization provides one of the first attempts at systematic data collection regarding who uses Whois, how they use it, and how they believe the system can be improved. This survey, which generated over 3000 responses over a period of several weeks in the summer of 2001, is in no sense a scientific sample - respondents were self-selected - but its results are nonetheless highly informative. The Task Force issued a preliminary report on these responses in March, with a final report expected by June. Among other issues, the survey asked whether respondents had been "harmed or inconvenienced" by "inaccurate, incomplete, or out of date" Whois data. Nearly half the respondents - 44% - reported harm or inconvenience. The data is currently undergoing further analysis, which may provide a more detailed explanation of the problems encountered.

In short, the evidence is strong that lax policies of registrars and insufficient oversight by ICANN are allowing a safe haven for clearly false contact data within the Whois databases of the legacy TLDs. Within this safe haven, the opportunities for consumer fraud, cybersquatting, and online piracy abound. Conversely, until steps are taken to improve the situation, the full potential for electronic commerce cannot be realized, because the conditions for a high level of public confidence in the medium are not fully in place.

TOWARD A SOLUTION TO THE WHOIS DATA QUALITY PROBLEM

The solution to this problem lies with the parties responsible for the current system: registrants, registrars, and ICANN. The current system gives registrants little incentive to provide accurate and complete contact data and to keep it current. The best incentive may be the threat that a failure to meet these obligations will lead to cancellation of the domain name. That threat is empty today because such cancellations almost never occur.

To get a handle on this problem, registrars must adopt a three-point plan for dealing with registrants who provide false contact data: *screen them out*, check them out, and toss them out. Simple off-the-shelf tools are available that would allow registrars to automatically screen out and reject registration applications (at least from U.S.-based registrants) that contain blatantly false contact data, such as addresses, zip codes, and telephone area codes that do not match up. If registrars would use these, the bar to registrations based on such data would be raised significantly at the outset of the registration process.

Second, registrars must undertake a more intensive verification and re-verification process on at least a sample of registrations. Even this process could be automated to some extent, through the use of e-mail pinging programs and the like, although in some cases human intervention may be required to verify the information contained in the Whois database. Such spot-checks would catch much of the false Whois data that manages to slip through the initial screening process.

Finally, registrars must vigorously exercise the authority the RAA already gives them to cancel registrations based on false contact data or data that cannot be verified. Each registrar should establish and publicize a contact person for receiving reports of false Whois data, and should implement a system with strict timetables for investigating these reports and canceling the corresponding registrations of those for which complaints prove valid.

Ideally these desperately needed reforms could be developed and implemented voluntarily by registrars through adherence to a code of best practices. Unfortunately, there is little indication that registrars are interested in pursuing this course or that they could successfully achieve significant improvements this way. It would also be possible for Congress to legislate incentives for registrants to submit accurate contact data and for registrars to make serious efforts to improve Whois data quality. However, if such legislation were needed, it would have to be carefully crafted to avoid any unintended consequences. In addition, its applicability to registrars and registrants located outside the United States would be open to question. With these constraints in mind, however, we believe that a legislative response is certainly worthy of careful consideration.

THE ROLE OF ICANN

Ultimately, the buck now stops at ICANN. It has entered into enforceable agreements with registrars on Whois data quality issues; it is past time for it to enforce those agreements aggressively. In the agreements, it has reserved the authority to issue supplemental binding policies on Whois data quality, which the registrars are obligated to carry out. Now is the time for ICANN to issue those policies and to require registrars to abide by them.

Last Friday, ICANN issued a "Registrar Advisory Concerning Whois Data Accuracy," which may be found at <http://www.icann.org/announcements/advisory-10may02.htm>. CCDN believes this is a good first step toward reminding ICANN-accredited registrars about their obligations regarding Whois data quality, and toward spelling out what the registrars need to do to fulfill these obligations. The tone of the Registrar Advisory is quite low-key, however; it speaks in terms of what ICANN "suggests" and what it thinks registrars "will find" to be the most efficient way of meeting their obligations. To give one example, the Advisory states that "accepting unverified 'corrected' data from a registrant that has already deliberately provided incorrect data may not be appropriate." This is exactly the problem that the OECD encountered in its efforts to identify the cybersquatter of ocde.org, and we are hard pressed to imagine any situation in which it would be "appropriate" for a registrar to accept unverified and equally bogus data from a serial Whois abuser. This is just the sort of situation in which ICANN should exercise its authority to issue a "specification or policy" regarding verification of submitted contact data, and should take swift action against registrars that fail to implement the policy.

Only if the soft words of last week's Registrar Advisory are followed up with firm actions against non-compliant registrars will it be clear that this good first step is leading down the right path for cleaning up the Whois database. As the OECD observed in its report, "improvements need to be made and could be made within the

current self-regulatory ICANN system.” The time for ICANN to make those improvements is now.

WHOIS IN THE CCTLDS

As CCDN has told this subcommittee before, one of our most serious concerns has to do with the status of Whois in the country code Top Level Domains. These ccTLDs are, on the whole, growing faster than the gTLDs, but their Whois access policies vary widely. Some ccTLDs do provide free, publicly accessible Whois data on a basis comparable or even superior to that offered in the gTLD environment. Most, however, do not. Some charge a fee for this basic registrant contact data; some require Whois requesters to meet some sort of special qualifications in order to obtain access; some drastically restrict the data elements made available via Whois, or refuse to deliver Whois results online; some simply do not provide Whois access at all. Until more ccTLDs provide real-time public access to Whois data on terms similar to those applicable in the gTLD environment, the issue of Whois data quality in the ccTLDs cannot be comprehensively assessed, much less resolved.

The clear solution to this problem would be for ccTLDs to take on the same obligations with regard to Whois that now apply in the gTLD world. Although CCDN and the entire IPC have long supported this goal, we recognize that for a number of reasons, progress has been slow. We are disturbed, however, by recent indications that ICANN is so eager to sign agreements with ccTLDs that the content of those agreements with respect to Whois obligations has been watered down.

ICANN has now signed ten agreements with gTLD registries (.com, .net, .org, .biz, .info, .name, .pro, .museum, .coop, and .aero). All these provide obligations with regard to public access to Whois (and Whois data quality) that are similar to those summarized above in the Registrar Accreditation Agreements. In recent months, however, ICANN has, for the first time ever, signed agreements with two Top Level Domain registries that do not contain any immediate obligation to make Whois data publicly available or to maintain its quality. These agreements, with the ccTLDs for Australia (.au) and Japan (.jp), set an unacceptable precedent: that ICANN may no longer insist upon the accountability and transparency provided by publicly accessible Whois as a condition for granting recognition to registry operators. CCDN recently wrote to ICANN’s leadership to express its concerns about these two ccTLD agreements. We have provided a copy of this letter to the subcommittee and will update you on the responses we receive.

CONCLUSION

ICANN is currently engaged in a heated internal debate concerning restructuring, reform and evolution. This is an important debate whose outcome could help determine the future viability of this ambitious experiment in private sector self-governance of the domain name system. CCDN and its members believe that ICANN’s central role in setting policy concerning the Domain Name System should be preserved, and we are participating actively in the ICANN restructuring debate. One critical factor in the outcome of this debate will be the degree to which ICANN elicits the respect, support and participation of governments around the world, and in particular the U.S. government. If ICANN takes firmer steps down the path toward improvement of Whois data quality in the legacy gTLDs, and if it moves to promote greater public accessibility to Whois data in the ccTLD environment, it will certainly buttress its case for meriting the requisite level of support and participation from the U.S. government. CCDN strongly encourages it to do so.

Thank you once again for the opportunity to present the views of the Copyright Coalition on Domain Names. I would be glad to try to answer any questions you may have.

Mr. COBLE. Mr. Powell.

STATEMENT OF CAMERON POWELL, VICE PRESIDENT AND GENERAL COUNSEL, SNAPNAMES

Mr. POWELL. I want to thank the Chairman, Congressman Berman and Members of the Subcommittee for inviting our testimony on the domain industry’s obstacles to Whois accuracy.

Because my company’s mission is actually to provide innovative solutions for the domain industry, we have seen the hard way how the domain industry, driven by politics rather than market demand, is currently structured not to foster innovation but to thwart

it. I include there innovations that could have made the Whois much more accurate already.

I am also told by intellectual property owners and law enforcement officials that they need to be able to do searches on accurate data in order to track cybersquatters, copyright violators, criminals and to inventory company assets and avoid inadvertent expirations. The only way to reconcile these needs with the need for consumer privacy is for third parties to build a Whois that is accurate but that is also accessible, unified and searchable. In fact, an accessible, unified and searchable database is the best way to achieve the accuracy you want, but it can only be provided by third parties who are supported by mandates from either this body or ICANN.

SnapNames conservatively estimates there are at least 1 million inaccurate Whois records in com, net and org alone. The consequences of not being able to find and correct them include safe harbor for wrongdoers and inadvertent expirations for domain name owners.

Why does inaccurate information get put into the Whois? That is simple. It is put there by registrants who either give inaccurate addresses in order to hide their identities or to avoid telemarketing spamming and other privacy violations.

Why is inaccurate Whois data allowed to remain in the Whois? Well, this is a much more interesting question.

First, the legal mandates on registrars are rather vague and never enforced. The penalties against bad-faith registrants can only charitably be called slaps on the wrist. And ICANN's consensus process will never change these facts because of the second reason for inaccurate Whois databases: Some registrars just don't want to correct Whois inaccuracies. They don't want to correct them because the bulk of their money comes from cybersquatters.

There are, surprisingly, no prohibitions against servicing cybersquatters in this fashion. It reflects an increasing trend among registrars to give grey market preferential treatment to cybersquatters and speculators at the expense of mainstream consumers like your constituents.

Third, most registrars who do want to keep accurate Whois databases simply can't afford to. It is technically possible but just very expensive.

Finally, third-party providers like our company aren't allowed to enable correction of bad addresses because registrars won't give us the Whois access we would need to make inaccurate Whois records detectable in the first place. The registrars' reaction is not unreasonable. Their customers have been burned too often by spammers, by telemarketers and by their own competitors, all using what are essentially the registrars' own customer lists, the Whois.

Unfortunately, without being able to access the data, parse it and by parsing the data fields allow searchability by any data field, we can't detect bad data using either address correction software or the work of IP owners who can detect it through searches on domain names or addresses or cybersquatters of interest.

In short, the solution to greater accuracy includes, quite simply, greater access by third parties who can unify and parse the data to make it searchable so that bad data is detectable in the first place.

Now because most registrars can't or won't clean up their Whois, third parties need to be allowed to respond to market demands and clean it up themselves. And because no individual registrar would ever be allowed by its competitors to aggregate all Whois data into a searchable unified Whois, only a third party can unify, parse and allow that searchability.

So our recommendations then to this Subcommittee are as follows: First, ensure registrar compliance with the existing Whois access requirements. There is rampant noncompliance. I can give you information on that.

Second, to encourage registrars to provide that access, eliminate the mandate for registrars to give their precious customer lists to their competitors.

Third, ensure that no registrar is able to sell its resources on the gray market to give preferential treatment to certain customers at the expense of mainstream customers.

Fourth, ICANN's agreements need enforcement teeth against both registrars and registrants; and ICANN should have a litigation budget.

Finally, we need to change the way ICANN's communitarian consensus process, which ICANN's president has acknowledged is completely ineffective, not only blocks policy reform but, worst of all, market-based solutions and innovations of the sorts we would like to see.

Again, we thank the Subcommittee for its time and attention today.

Mr. COBLE. Thank you, Mr. Powell.

[The prepared statement of Mr. Powell follows:]

PREPARED STATEMENT OF CAMERON POWELL

Mr. Chairman, Congressman Berman, and members of the Subcommittee:

I commend the subcommittee for holding this important hearing, and I thank you for inviting our testimony today. My name is Cameron Powell; I am here today in my capacity as Vice President and General Counsel of SnapNames, a technology developer for domain name industry infrastructure that's headquartered in Portland, Oregon. Our company also publishes State of the Domain, a monthly report providing data and trend analysis for our industry, now read by more than 2,600 subscribers.

The matter of accuracy in the Whois database is critical to all who have an interest in the use of domain names as an Internet navigation tool, which today, represents a significant majority of American businesses, intellectual property owners, and end-users of the Internet. It is, however, important to note that there are other serious issues relating to the Whois that are developing in parallel—and sometimes more rapidly—and that must be addressed in order to make any actions to ensure an accurate database fully effective and enforceable.

Therefore, in addition to the critical issue of accuracy, I'll address the reasons that innovative companies and technology developers should, for the sake of IP owners, corporations, and the stability of commerce on the Internet, be able to provide the industry with critical Whois tools that will effect an accurate, searchable, non-threatening and useful database. I'll also address the correctable political reasons such companies can't do so now, and what this body can do to assist the industry in allowing more efficient innovation that will be ultimately beneficial to all end-users.

I. THESIS: ENTIRELY SOLUBLE WHOIS-RELATED PROBLEMS THREATEN ECOMMERCE, IP RIGHTS, AND LAW ENFORCEMENT

Today, the Whois databases are plagued by a serious, growing, and yet frustratingly correctable problem with:

- the integrity of the databases;

- the accuracy of the databases; and, importantly,
- access to the databases for legitimate purposes.

At the highest level of analysis, the reasons for Whois deficiencies are as follows:

- 1) Up to now, there have been no enforced, legal requirements to make the Whois better than it is, or at least not to make it worse;
- 2) No regulatory authority has yet stepped in to impose any such requirements or enable their enforcement;
- 3) Business incentives alone are insufficient to motivate those registrars whose business models rely on serving a select few; and
- 4) The domain name industry is left to police itself through a paralyzing so-called consensus process. The futility of consensus in an innovative, capitalist society is illustrated in the fact that ICANN's consensus process has, so far, and by ICANN's own statement, arrived at no innovation, no reform, not even a policy, and that ICANN itself has openly advocated a new and different approach to policy development. Worse, given that the main participants in the consensus process do not (and could not be expected to) consider the public interest, consensus is akin to putting foxes in charge of agreeing to security policies for the henhouse—or, in this case, the public interest.

Whois problems prevent Internet end-users, registrants, intellectual property owners, attorneys, law enforcement officials, ICANN, and domain name registrars and registries from using the database for legitimate purposes *that do not unduly impact privacy rights or the proprietary rights of the registrars*.

With its recent bills proposing criminalization of fraudulently provided registration data, Congress has done some valuable work for the betterment of the Whois database. This action is both relevant and timely. In the matter of national security, for example, law enforcement officials indicate repeatedly that the Internet is an active front in the war on terrorism, and it is well known that an accurate and searchable Whois database can be one of many tools for tracking down threatening organizations. The domain name community has an opportunity to become more involved in developing fair standards that help ensure user accountability together with enforcement mechanisms for their breach.

The problem of course is not limited to national security. Unfortunately, there exist pervasive and pernicious problems that impede intellectual property protection and legitimate law enforcement use of the Whois.

Allow me to summarize a number of current issues—some of them potentially very serious—that must be understood before considering forms and methods of corrective action. Indeed, many of these issues could be reaching crisis.

As an example, it is entirely plausible that as early as this summer, there could be more registrars going out of business than can be bought up. At that time, members of this committee could begin to receive angry calls from constituents all over their districts complaining that the constituents' websites have suddenly disappeared because the industry has no provisions for escrowing Whois data against catastrophe.

Let me outline other challenges:

- 1) Tracking down cybersquatters

Today, IP owners have unnecessarily weak capabilities to track down cybersquatters or the copyright pirates who've been estimated to cause well in excess of \$22 billion in losses each year. (Statement of Steven J. Metalitz, International Intellectual Property Alliance, before House Judiciary Committee's Subcommittee on Courts, Internet, and Intellectual Property, March 22, 2001 (page 62) ("March 2002 Hearing".) Trademark owners have unnecessary difficulty proving the patterns of prior bad acts that are crucial to a finding of bad faith under the Anti-Cybersquatting Protection Act, allow recovery of intellectual property, and permit reimbursement of attorneys' fees.

- 2) Tracking domain name inventory

Today, corporations have no way to make an inventory of all of their domain assets, without regard to whether the corporate agent doing the searching remembers registering the name or knows it exists; without regard to the registrar or the employee who did the registration. As one result, they cannot know all that they own and do all the things companies can do when they know what and where their assets are.

- 3) Preventing inadvertent expirations

As another result, domain names expire inadvertently every day, shutting down e-commerce and non-profits, sometimes sending domain names into the hands of pornographers, and setting off frantic and expensive legal battles. This is preventable, but not without regulatory help for businesses like ours.

There are technical solutions to all of these problems. Our company, perhaps among others, has already solved them for COM, NET, and ORG. The .PRO and .BIZ registries, which are thick registries, have proposed solving them for their TLDs. But in COM, NET, and ORG, where the data is held by 100 different registrars, we're stymied because not all registrars have business incentives to deal with wrongdoers, and there are no requirements for these registrars to do the trivial work that would help companies like ours help your constituents to do so. To be able to provide solutions to corporations, domain name owners, and law enforcement, companies like ours need help.

But left unchecked, these issues will continue to harm the databases' integrity and accuracy, prevent reliable and legitimate data use, likely harm e-commerce, and potentially detract from the stability of the Internet. The good news is that every currently identified Whois-related problem is technically correctable, provided innovative businesses' barriers to doing so are removed.

II. HISTORY AND CONTEXT

The current state of the many disparate and unconnected Whois databases, critical elements of the domain name system, is a good example of the law of unintended consequences.

As you may know, Network Solutions, Inc. (NSI), the original operator of the COM, NET, and ORG ("CNO") TLDs, operated as a "thick" registry, which meant that NSI held all customer and domain-related fields in its own database, including the administrative, technical and zone/billing contact (see Appendix 1).

In late 1999, when the U.S. Department of Commerce and ICANN opened up CNO registration services for competition, this Humpty Dumpty that is the thick Whois had a great fall, split into what is now 100 pieces, and no one has put it back together again. Under the theory that the registry should not have access to the registrars' customer data, Network Solutions (now VeriSign Global Registry Services), was made a "thin" registry, meaning registry-level Whois data included only data about a name's sponsoring registrar—and the critical customer data would be held exclusively by registrars.

(This policy has been slightly modified as it applies specifically to the recently-introduced new generic top-level domains (gTLDs, including BIZ, INFO and NAME); in these instances, thick Whois data is maintained at the registry level, though the customer information therein is considered by all involved to be proprietary to registrars. In fact, their creation as thick registries suggests that the goals behind the splitting of the CNO Whois data could also have been accomplished by contractual means, rather than by technical separation.)

The Whois for COM, NET, and ORG has never been the same.

III. CURRENT PROBLEMS: ACCURACY, ACCESS, ESCROW

This subcommittee is interested in the topic of data accuracy and integrity—indeed, vital to the efficacy of the Whois database. However, we must also suggest that it's critical to address Whois access, because if there is no meaningful access by third parties, those third parties can never clean up inaccurate data in the first place, and can never give IP owners and law enforcement the capabilities that they could and should have. A related issue of rapidly-growing importance of Whois escrow, a preventive measure many registrars have not taken, and which threatens the stability of e-commerce for the very real people in your respective home districts.

Let's begin with accuracy.

1) Accuracy

Why does the Whois database have so much false or inaccurate data? It is inaccurate because:

- Bad-faith registrants make it so, and our company isn't allowed to provide IP owners with the necessary, searchable Whois to find all such instances of bad faith registrations;
- False information goes uncorrected and registrars who exist solely to serve speculators—and there are more than a few—have no business reasons, indeed only a disincentive, to make such corrections, which would often require deleting the names of their own customers that knowingly provided the false information;

- Good-faith registrants merely make mistakes that go uncorrected—again, because we’re not allowed to provide the address authentication and hygiene that would fix the mistakes.

The rate of these inaccuracies is significant enough to warrant attention. According to our own statistical sampling of registrations from the BIZ and INFO gTLD registries:

- Percentage with identical digits in phone number field: 4.7%
- Percentage with identical digits in ZIP code field: 6.5%
- Percentage with invalid ZIP codes: 4.0%
- Average percentage with mismatched cities or states to ZIP codes: 7.0%

By our estimates, if even half of the above rates of error were present in COM, NET and ORG (CNO) registrations, more than 800,000 CNO names would be considered inaccurate. While this represents less than 3% of all names, you can be sure that if someone has taken the trouble to list false information for a name, it’s either because they don’t want to get junk-mail or they are hiding something. In either event, both the excess of junk-mail generated through Whois mining and the ability of wrongdoers to hide their identities in the Whois are proper concern for this subcommittee.

One of the many consequences of inaccurate Whois data is that we and others are impeded from developing tools capable of preventing a wide range of dangers, including:

- Infringement against intellectual property and trademarks
- Online theft and e-commerce fraud
- Inhibition of law enforcement efforts or even threats to national security

Why can’t Whois inaccuracies be fixed? First, it is extremely expensive for registrars, many of them already struggling, to prevent or respond to inaccuracies on their own. (If Congress wants verification of addresses upfront, then it must be prepared for a massive slow-down in registration processing, which will affect commerce, and it must make verification an enforceable mandate, so that registrars who do verify and must charge far higher prices for domain names are not put of business by those who don’t verify and continue to charge only \$8.) Second, the business models of a handful of registrars, which favor providers of false information, give them no business incentive to make their Whois accurate. And finally, the industry has no back-up requirement that data be provided to third parties who will verify and clean up the data and allow its ready searchability, spreading or even eliminating the one-time cost so that each registrar doesn’t have to incur the entire cost itself, if at all.

Because registrars’ Whois databases represent a master list of their current and potential repeat customers, most have responded to the incentive to maintain quality databases that will enable them to send regular reminders to renew. Registrars do also have the legal and technical ability to cancel a registration if it is determined to be fraudulent or inaccurate. But many lack the personnel resources to do so, and those that exist largely to serve a select few and freeze out the general public lack the will to do so. Why enforce any sanctions against your bread and butter?

(This problem of registrars favoring speculators at the expense of the public interest is not limited to Whois, and would merit a discrete hearing in its own right: the same registrars, and more to boot, also give high-paying speculators exclusive and preferential access to the CNO registry for the greatest source of good domain names available: the nearly 1 million previously-registered domain names that expire every month, including those churches’ domain names that expire and are secured by pornographers. Regular people, IP owners, have virtually no ability to acquire or retrieve these valuable names, and the reason is certain registrars’ preferential treatment of a select few at the expense of the mainstream public, which is entirely locked out.)

Unfortunately, non-compliant registrars have no real legal incentive to become compliant. ICANN’s only available enforcement is total de-accreditation—a severe, and for the registrants at the affected registrar, Draconian solution. So ICANN simply levies no sanction, but in doing so, it signals that it has no enforcement capability at all. To help monitor and remedy Whois accuracy issues, ICANN needs lesser, graduated penalties, perhaps fines for registrars’ willful failure to correct registration information submitted in bad faith, and further fines for willful failure to delete domains whose Whois remains uncorrected (and perhaps also penalties for those who *complain* about such registrations in bad faith). It also is critical that ICANN, in whatever its post-reform model may be, be adequately funded for the

technology and personnel necessary to provide sufficient detection, investigation, and enforcement.

2) *Access for legitimate purposes.*

Though Whois accuracy is a serious issue that deserves attention and corrective action, an equally important, if not more pressing, issue is that of access. A fully accurate database is of no practical use if it is not meaningfully accessible. And today, registrars' Whois databases for COM, NET, and ORG are not meaningfully accessible in, for example, the way described by others who have testified here in the past:

At launch, the RegistryPro *centralized Whois database* would be publicly available, and IPR (intellectual property rights) holders would be able to use the query service to search for cyber squatters. To further support IPR holders' ability to protect their rights, RegistryPro would *build enhanced searchability to enable IPR holders [to] search for more derivations of their name, in more fields, and yield a greater number of matches.*

Statement of Elana Broitman, Register.com, March 2001 Hearing (page 39) (emphasis added).

[T]he "Whois" database will initially be searchable by domain name and the registrant's name. Neulevel is also working on developing a fee-based system whereby *IP owners will be able to search other fields in the "Whois" database, both through key words and Boolean-type searches.*

Statement of Jeff Neumann, Neulevel, Inc., March 2001 Hearing (page 45) (emphasis added).

Among the chief goals of copyright and trademark owners are . . . to increase the reliability and usefulness of Whois access, *both by improving the quality and accessibility of Whois data and by enhancing its searchability.*

Statement of Steven J. Metalitz, March 2001 Hearing (page 65) (emphasis added); see also Metalitz at pages 69–70 (listing all searchable fields IP owners need).

Finally, ICANN's Registrar Accreditation Agreement for COM, NET, and ORG already contemplates third parties integrating just these capabilities into a value-added tool such as what has been called a searchable Universal (or Unified) Whois:

3.3.6.5 Registrar's access agreement may require the third party to agree not to sell or redistribute the data except insofar as it has been *incorporated by the third party into a value-added product or service* that does not permit the extraction of a substantial portion of the bulk data from the value-added product or service for use by other parties.

(emphasis supplied).

But a unified database searchable by multiple fields is not available in COM, NET, and ORG. And it won't be without action from Congress or ICANN. If the data can't be accessed, it can't be aggregated, and if it can't be aggregated:

- Third parties can't parse the different formats and build search tools to help law enforcement and IP owners can't search it;
- Third parties can't help end-users verify and clean the data; and
- Third parties can't help registrars escrow data against the potential demise of a registrar.

Specifically, *Attorneys, Law Enforcement, and IP Owners:*

- Want to—but cannot—search on individual Whois fields in order to locate defendants or find evidence of their prior bad acts in registrations, in order to obtain findings of bad faith under the ACPA and attorneys' fees and costs;
- Identify and locate copyright infringers and pirates;
- Are impeded in law enforcement by numerous egregiously bogus sets of Whois data;
- Want to know the availability and uniqueness of domains prior to branding and trademark application;
- In mergers and acquisitions of companies, or purchases of domain names, need to be able to search the history of a domain registration record (its historical Whois) and its attached website; and
- Need to be able to find correct addresses for defendants, find other sites (owned by a common registrant) that may also contain illegalities, and aid in criminal investigations.

Corporations, IP Owners, All Registrants:

- Can't inventory and track domain name assets in order to maintain and protect those assets against ignorance of the existence of those assets, theft, employee conversion and departure, and high rates of inadvertent expiration. (Our data and experience show that ignorance, even more than the lack of an additional "redemption period" as recently proposed by ICANN, is the primary cause of inadvertent expirations.¹);
- Suffer from mistakes—uncorrectable due to lack of notification—in Whois addresses, resulting in inadvertent expirations;
- Can't determine which websites have been pointed at their own, as *gmsucks.com* was pointed at *ford.com* (now a subject of ongoing litigation);
- Are forced into a false choice between their own privacy and their own ability to conduct law enforcement (false because paying for each search result in a unified Whois search tool would be prohibitively expensive for telemarketers, and access could additionally be restricted to law enforcement personnel); and
- Rampant non-compliance by registrars and registrants with the RAA's Whois accuracy requirements² leaves constituents of ICANN and Congress unable to enforce laws and protect assets.

IV. WHY THE WHOIS DATA IS NOT MEANINGFULLY ACCESSIBLE: THE TECHNOLOGY AND REVENUE OPPORTUNITIES FOR A UNIVERSAL WHOIS EXIST, BUT THE BUSINESS AND POLITICAL WILL MAY NOT

We have cleared the technical hurdles to gathering, parsing, normalizing, searching, and cleaning up Whois data. The greatest obstacle to industry innovation on a Universal Whois is some of the data holders (registrars and registries) themselves.

The intransigence of some of the registrars is not incomprehensible. They have all too often seen their precious customer data become victim to the predations of spammers, telemarketers—and other registrars. Registrars have seen little but abuse of the ICANN mandate that all registrars must provide a bulk Whois for up to \$10,000, as other registrars or resellers have simply bought the data and lured away their customers, sometimes with patently misleading campaigns.

So, registrars have erected numerous obstacles to Whois uses. Unfortunately, these obstacles so far are blind to whether the use is legitimate or not, and so throw out the baby with the bath water. These obstacles include:

- Registrars free-forming their own policies on Whois availability and usage, including:
 - i. Bulk Whois restrictions different from those permitted by ICANN
 - ii. Port 43 server access restrictions different from those permitted by ICANN
- To limit predation from other registrars, some registrars greatly decrease the size of the Bulk Whois they provide, despite the RAA's clear language stating (a) customers must "elect" to opt out and (b) customers may only elect to opt out of use of their registrations in Bulk Whois data to be used for "*marketing purposes*"—*i.e.*, registrars may not themselves opt customers out, and not any and all legitimate purposes.
- Some remove selected fields from their Whois records, including mandatory expiration and creation dates.
- Some randomize Whois formats and the order of content for each query (from subtle to prominent)—with no impact on usage by spammers, but with great disruption to legitimate usages.

¹This includes the unfortunate current practice known as "porn-napping," whereby a domain name (usually previously registered by a religious organization, non-profit, municipal government, or other similar entity) is inadvertently allowed to expire and be returned to availability, only to be registered by a second party who publishes pornographic or other content that is likely objectionable to the previous registrant. The second registrant offers the name back to the original registrant at a premium price, with the hope that the original registrant will accept the sale offer as a way to avoid embarrassment or reputational damage. Regrettably, this represents no technical violation of registration procedures, though our industry as a whole widely condemns it as distasteful, as does SnapNames. We and our industry colleagues encourage all registrants to be active and informed custodians of their domain name assets.

²E.g., 3.7.8 "Registrar shall abide by any specifications or policies established according to Section 4 requiring reasonable and commercially practicable (a) verification, at the time of registration, of contact information associated with a Registered Name sponsored by Registrar or (b) periodic re-verification of such information."

- Some use the RAA's allowance of an "up to \$10,000" charge for their Whois³ to insist on \$10,000 even when they hold relatively few domain names—thus effectively preventing the very public access ICANN (and the public) desire: who can afford to pay \$1,000,000 for all 100 registrars' data?
- Some fail to provide any guidance as to what might constitute "excessive" querying by third parties, indiscriminately and without explanation blocking the queries of those third parties, negating the concept of the ICANN-mandated ability to query a Port 43 server.
- And some do not even have Port 43 look-up capability, or have hardware insufficient to support efficient Port 43 access.

A more narrow tailoring of registrar reactions is in order: one that prevents abuse of the Whois while allowing IP and law enforcement the access they need, and permitting registrars to add critical new revenue streams. We discuss these at the end of this document.

3) Escrow

The escrow mandated in the Registrar Accreditation Agreement (RAA)⁴ is still non-existent at most registrars, leaving many consumers and businesses at risk of name loss, website shut-down, and related consequences impacting the stability of the Internet and the commerce and flow of information on it. ICANN has mandated it, but neither ICANN nor most registrars has done anything about that mandate.

V. RECOMMENDATIONS

We strongly encourage Congress to support ICANN and its reform effort in a way that encourages the domain name industry to immediately take the following steps:

1. *Diminish the role of self-interested trade associations in policy and innovation, and the blocking thereof.* Reform and innovation should not be as susceptible as they are today to being hijacked by "consensus" processes where those who benefit from an undesirable practice are able to permanently filibuster solutions to it. ICANN needs policy decision-making by fewer trade associations and more representatives of the public interest. And trade associations should have no anti-competitive role whatsoever, as they do not in any other industry in capitalism, in approving or disapproving competitive innovations or alternative business solutions, as they do today.
2. *Enforce address verification and correction.* The requirement to respond to an incorrect address by allowing the registrant fifteen days to correct it, or to delete the name if it isn't corrected or is obviously fraudulent, is already in the RAA, and it's every complainant's nightmare. A few days before this hearing, on May 10, 2002, ICANN did send an advisory relevant to verification, but the problem of ICANN's inability to enforce its advisory remains. ICANN must be given the resources and tools for a credible enforcement effort.
3. *Ensure Port 43 Query Compliance.* ICANN should issue an Advisory, as it has done in the past for arguably less important matters, demanding that registrars make their Port 43 restrictions mirror the exact language of the RAA's allowable restrictions. Further, limitations on query amount or rate must be technically reasonable and not simply a way to block such queries by technical means where contractual means would not permit it. Real sanctions are necessary for non-compliance.
4. *Address Bulk Whois Access Compliance.* ICANN should issue an Advisory demanding that registrars make their Bulk Whois restrictions mirror exactly the RAA's allowable restrictions. Real sanctions are necessary for non-compliance.
5. *Issue clearly defined standards* for content and presentation of Whois data—what anti-spam scrambling of the data is allowed, and what is not. Real sanctions are necessary for non-compliance.
6. *Address escrow requirements immediately.* With nearly one in four of the largest 25 registrars looking for buyers, one can be sure a far higher percent-

³3.3.6.2 "Registrar may charge an annual fee, not to exceed US\$10,000, for such bulk access to the data."

⁴3.6 "Data Escrow. During the Term of this Agreement, on a schedule, under the terms, and in the format specified by ICANN, Registrar shall submit an electronic copy of the database described in Subsection 3.4.1 to ICANN or, at Registrar's election and at its expense, to a reputable escrow agent mutually approved by Registrar and ICANN . . ."

age of the smaller 75 are looking for buyers. How many will go out of business this year, without being bought, and without any Whois data in escrow? This is a time-bomb. It could become an issue very soon.

7. *Give ICANN a litigation budget.*
8. *Insert enforcement teeth into ICANN's agreements and give ICANN graduated penalties.* To regulate the Wild West the domain name industry has become, ICANN needs some lesser penalties, including (but not limited to) submission to more intensive and regular monitoring or auditing of use of common resources, and graduated fines to dissuade improper behavior.
9. *Mandate third-party (non-competitive) access to Whois data to be used for the sole, legitimate purposes of escrow, hygiene, and searchability, and eliminate the mandate for registrars to give their Whois to their competitors.* Because a primary reason the Whois data is hard to access is that registrars are trying to defend it from competitors, registrars simply shouldn't be required to give each other their priceless customer data, as they are today. We can think of no compelling justification for the requirement, and its consequences block critical innovations. (Nor do customers or registrars want the Whois used as a resource for spamming or telemarketing.)

Instead, registrars should be made to provide their Bulk Whois data to neutral third parties—non-competitors—who will agree to use the data solely for the purpose of escrowing, cleansing, or building searchable fee-based databases out of it. Because each registrar charging \$10,000 wouldn't get the project off the ground, registrars should be required to provide their Whois data to one or more third parties, for unified Whois use, on reasonable terms. These third parties would allow others to search the resulting unified database only under certain conditions (possibly with lesser or greater levels of access depending on a user's prior authorization) but at least at per-record prices that would make mining the database for marketing purposes prohibitively expensive. Users could be tracked and abuses recorded and penalized. While a public Whois look up on registrars' websites should remain free, though difficult to abuse via high-speed harvesting, no third party provider can do the necessary aggregation, parsing, and normalization of over 100 Whois formats, and then build a powerful Boolean search tool for the data, without being able to charge for its efforts. Competition will define the appropriate pricing.

It is our belief that with proper energy and support, ICANN and participants in the domain name industry are fully capable of addressing these Whois-related issues in a manner that is both efficient and complete.

Again, we thank the Subcommittee for its time and attention to this critical matter.

APPENDIX 1
Organization:

SnapNames.com, Inc.	[Organization/Individual Name]
Nelson Brady	
115 NW First Ave.	[Street Address]
Portland, OR 97209	[City, State, ZIP]
US	[Country]
Phone: 503-219-9990	[Telephone]
Fax.: 503-274-9749	[Fax]
Email: nelsonb@snapnames.com	[Email]

Registrar Name....: [Registrar].com
Registrar Whois...: Whois.[registrar].com
Registrar Homepage: [http://www.\[registrar\].com](http://www.[registrar].com)

[Promotional text and graphics omitted]

Domain Name: snapnames.com

Created on.....: Tue, Aug 22, 2000
Expires on.....: Sat, Aug 22, 2009
Record last updated on..: Sun, Mar 10, 2002

Domain servers in listed order:

PDX-DNS2.SNAPNAMES.COM	12.108.14.36
PDX-DNS1.SNAPNAMES.COM	12.108.12.51
NS1.ISDI.COM	204.107.85.2
NS2.ISDI.COM	204.107.85.100

Mr. COBLE. Mr. Palage.

STATEMENT OF MICHAEL D. PALAGE, ESQUIRE

Mr. PALAGE. Good morning. Thank you, Mr. Chairman and Members of the Subcommittee, for this opportunity to offer my industry perspective on the accuracy and access to Whois data and its impact on third parties that rely upon it.

My name is Michael Palage. I am actively involved in domain name policy issues based upon the following roles which I currently serve: as chair of the ICANN Registrar Constituency; as a trademark and policy consultant to Afilias, the registry operator for dot info; and as a founding member of the dot us Policy Council.

The Whois is broken. In its current embodiment it fails to meet the needs of intellectual property owners, law enforcement, consumer and privacy advocates and registration authorities.

In my testimony today I will touch on three points: number one, problems associated with false and inaccurate data; second, the cause of this data and the difficulties in correcting it once it has

been identified; and, three, registration authority concerns regarding Whois data initiatives.

The effect of false and inaccurate Whois data has been well documented, ranging from the inability of law enforcement to timely investigate and prosecute illegal activity to domain name motors that are unable to timely and properly renew and transfer their domain names.

False and inaccurate Whois data fuels into two categories: willful or unintentional.

The first and most egregious category is domain name registrants that knowingly provide inaccurate Whois data. This conduct is most often associated with individuals, businesses or organizations involved in illegal activities such as cybersquatting and piracy. This category of offenders is most problematic because it prevents law enforcement and intellectual property owners from taking appropriate and timely action against registrants engaged in illegal activity.

The second category of domain name registrants associated with inaccurate Whois data are registrants that initially provided inaccurate data but which over time has become inaccurate. These registrants can usually be tracked down with minimal effort and do not pose a significant threat to third parties.

One of the problems with the current system is that there are no uniform procedures or mechanisms in place for third parties to follow when they have an inquiry regarding inaccurate Whois data. Instead, intellectual property owners and law enforcement personnel are required to identify and comply with individual mechanisms of over 150 registrars.

On May 10th, ICANN released a Registrar Advisory Concerning Whois Data Accuracy. This advisory was intended to assist ICANN accredited registrars in understanding their obligations under the existing ICANN accreditation agreement.

Notwithstanding this positive step, there are still other mechanisms that should be explored to provide a more unified process for third parties to report false or inaccurate registration data.

Domain name registration authorities, including both registrars and registries, have a vested interest to work with all parties involved in this debate to provide full, open and accurate access to Whois data for those parties that need it. However, it is important to understand some of the following concerns that registration authorities have:

First, prescreening of data. The prescreening of Whois data at this time remains a technically and economically nonviable solution. You must focus on standardizing the process for identifying and correcting false or inaccurate data once it has been brought to the attention of an ICANN registrar through third parties.

The second is the ICANN Board resolution 02.45. An important step to mitigate some the effects of false and inaccurate Whois data was taken by the ICANN Board. This resolution provided for the convening of a technical steering group to develop a proposal for implementing a redemption grace period. This redemption grace period was designed to prevent the accidental deletion of the domain names such as happened in the OECD case.

A third important concern is spam and slamming. Unfettered access to the Whois data has resulted in a proliferation of questionable marketing practices by third parties that threatens to undermine legitimate users from maintaining accurate Whois data. The hostility surrounding these questionable market practices continues to escalate and erode user confidence.

In conclusion, there has been a series of positive steps taken to date to address some of the immediate problems and concerns associated with false and inaccurate Whois data. These include the ICANN Registrar Advisory, the ICANN Board resolution, the continued communication between the intellectual property community and registration authorities, and efforts by ICANN registrars to verify their data. These positive steps do not indicate an end to a journey, merely its beginning.

Issues that loom on the horizon and which will directly impact the permanent solution to Whois data include the following: a successful restructure of ICANN and the design and adoption of uniform mechanisms for third parties to report claims of false or inaccurate data and outreach to all Internet users that are affected by the Whois policies.

Thank you for the opportunity to participate today.

Mr. COBLE. Thank you, Mr. Palage.

[The prepared statement of Mr. Palage follows:]

PREPARED STATEMENT OF MICHAEL D. PALAGE

I. Introduction

Thank you, Mr. Chairman and members of the subcommittee for this opportunity to offer my industry perspective on the accuracy and access to Whois data and its impact on those parties that rely upon it.

My name is Michael D. Palage, and I am actively involved in domain name policy issues based upon the following roles in which I currently serve:

- chair of the ICANN Registrar Constituency;
- trademark and policy consultant to Afilias, the registry operator for the .info top-level domain;
- World Intellectual Property Organization (WIPO) Uniform Dispute Resolution Policy (UDRP) panelist; and
- founding member of the .us Policy Council.

I believe these multiple perspectives allow me to give an objective view regarding problems with the accuracy and access of Whois data and a meaningful framework toward improvement and reform.

II. Summary

Whois is an important resource; it is relied on by individuals, trademark attorneys, copyright owners, law enforcement, and other governmental agencies, such as the FTC and their global counterparts. It is a critical resource. However, as important as the Whois is, the present approach to ensuring accuracy and access to the Whois databases has proven ineffective.

In my written testimony I will describe to you the following:

- problems associated with false and inaccurate Whois data;
- the cause of false and inaccurate data, including both willful and unintentional acts of registrants;
- difficulties in correcting false and inaccurate data once it is identified;
- an overview of the structural differences between registries, and how this impacts the accuracy of Whois data; and
- registration authority issues regarding Whois data initiatives.

III. Symptoms of False and Inaccurate Whois Data.

The effects of false and inaccurate Whois data have been well documented, but it is important to reiterate and highlight these effects so that they provide a framework for discussion. The following is not intended to be an exhaustive list:

- the inability of law enforcement to timely investigate and prosecute illegal activity;

- the ability of cybersquatters to frustrate intellectual property owners in their efforts to police and enforce their intellectual property rights online;
- domain name owners that are unable to timely and properly renew their existing domain name registrations because of outdated and inaccurate information thus resulting in the unintended deletion of their domain names; and
- interfering with competitive transfers of domain name between registrars.

IV. Identifying the Cause of False and Inaccurate Whois Data

False and inaccurate Whois data falls into one of either two categories: (A) willful or (B) unintentional.

A. Willful Submission of Inaccurate Whois Data

The first and most egregious category is domain name registrants that knowingly and willfully provide inaccurate Whois data. This conduct is most often associated with individuals, businesses or organizations involved in illegal activities such as cybersquatting and piracy.

This category of offenders is most problematic because the willful submission of Whois data prevents law enforcement and intellectual property owners from taking appropriate and timely action against domain name registrants engaged in illegal activity.

Included as attachment #1 is some research that is currently being conducted by Mr. Ben Edleman, a senior at Harvard University where he studies economics and statistics. Mr. Edleman is also a technology analyst for the Berkman Center for Internet & Society at Harvard Law School. The topic of his research paper is Large Scale Intentional Invalid Whois Data. In his paper, Mr. Edleman focuses on the various techniques used by one specific domain name registrant to keep its identity secret. The domain name registrant that is the subject of Mr. Edleman's case study is operating under the aliases of NICGod Productions and Domains for Sale.

This particular registrant has been the subject of numerous UDRP proceedings and was the individual involved in the domain name dispute with the Organization for Economic Co-operation and Development (OECD).

B. Unintentional/Unavoidable Inaccurate or Outdated Whois Data

The second category of domain name registrants associated with inaccurate Whois data is registrants that initially provided accurate data that over time has become inaccurate. These domain name registrants can usually be tracked down with minimal effort, thus not possessing a significant threat to anyone but himself or herself. The greater harm arises when this inaccurate Whois data prevents competitive transfers of domain names and threatens the accidental deletion of a domain name with potential drastic economic effects to the registrant.

It is important that this second category of domain name registrants not be made criminals for actions (or inactions) beyond their control. Included in attachments #2 thru #9 is a chronology of my personal efforts to correct outdated Whois data, which took over two months. During this time, I was prevented from timely transferring my domain name to another registrar of my choice, and my domain name expired, although I was able to renew my domain name prior to its cancellation.

V. Difficulties in Correcting Potentially False and Inaccurate Whois Data

One of the problems with the current system is that there is no uniform procedures or mechanisms for third parties to follow when they have an inquiry regarding the accuracy of Whois data. Instead, intellectual property owners and law enforcement personnel are required to identify and comply with individual mechanisms for over one hundred and fifty ICANN accredited registrars.

On May 10, 2002, ICANN released a Registrar Advisory Concerning Whois Data Accuracy, see attachment # 10. This advisory was intended to assist ICANN accredited registrars in understanding their obligations under the ICANN Registrar Accreditation Agreement.

In summary these obligations include:

- require each registrant to submit (and keep updated) accurate contact details (Section 3.7.7.1);
- provide both a web-based and Port 43 Whois service providing access to complete contact information for all TLDs covered under the RAA (Section 3.3.1);
- require registrants to agree that willfully submitting inaccurate contact details (or failing to respond within 15 days to an inquiry regarding accuracy) shall be a basis for cancellation of the registration (Section 3.7.7.2); and,
- take reasonable steps to investigate and correct the contact details in response to any reported inaccuracy (Section 3.7.8).

It is important to note that the ICANN advisory has attempted to provide uniform guidance on the appropriate course of action registrars are to take when a domain name registrant is found to have committed a material breach of their contract by failing to respond for over fifteen calendar days to a registrar inquiry regarding the accuracy of Whois data. The ICANN advisory states clearly that absent "extenuating circumstances the registrar should cancel the domain name registration." This interpretation is similar to the guidelines incorporated by NeuStar into their registry registrar agreement for .us. See attachment #11 for this provision in NeuStar's original proposal to the Department of Commerce.

Notwithstanding these positive steps, there are still other mechanisms that should be explored to provide a more uniform process for third parties to report false or inaccurate registration data. Some of these mechanisms could include:

- a standard email address for each registrar to maintain for third parties to report false or inaccurate Whois data, i.e. (Whois@ICANN-REGISTRAR.TLD);
- a central repository to track Whois verification requests to registrars, however, questions of who would run this repository and how it would be funded are tough questions that will not easily be answered.

Because of the contractual relationship between the parties, the ultimate responsibility to inquiry and substantiate the accuracy of the Whois data must reside between the registrar of record and the domain name registrant.

VI. An Overview of the Differences Between Registry Operations

It is vital to understand the various differences and nuisances between registry operators to design and implement a universal solution to Whois data accuracy, failure to understand the big picture will perpetuate the patchwork solutions that have failed to date.

A. Generic top-level domains versus Country Code top-level domains

Generic top-level domains (gTLDs) are those administered by ICANN through a contractual agreement with the registry administrator. Examples of gTLDs include .com, .org, .net, .info, .biz, .museum, .coop, .name., .aero and .pro. Additional qualifiers sometimes used to distinguish gTLDs are: sponsored versus unsponsored and open versus restricted.

Generally speaking, an unsponsored TLD operates under policies established by the global Internet community directly through the ICANN process. A sponsored TLD, however, is a specialized TLD that has a sponsor representing the narrower community that is most affected by the TLD, and to which ICANN has delegated certain policy considerations.

An open gTLD is one in which there are no registration restrictions aside from those imposed by ICANN, i.e. UDRP, data accuracy, etc. Examples of open gTLDs include .com, .net, .org and .info. Restrictive gTLDs, however, may include a wide range of addition registration restrictions which are generally included in Appendix L of the standard ICANN Unsponsored Registry Agreement. For example, NeuLevel, the registry operator for .biz, has an anti-speculation provision and a requirement that the domain name registered must be used or intended to be used primarily for bona fide business or commercial purposes. RegistryPro, the recently accredited registry operator for .pro is exclusively available to only licensed professionals.

Listed below is a chart that provides a list of the current gTLDs and their relevant characteristics.

	Open/Restrictive	Sponsored/Un-Sponsored
.com	Open	Unsponsored

.org	Open	Un-sponsored
.net	Open	Un-sponsored
.info *	Open	Un-sponsored
.biz *	Restricted	Un-sponsored
.pro *	Restricted	Un-sponsored
.name *	Restricted	Un-sponsored
.aero *	Restricted	Sponsored
.coop *	Restricted	Sponsored
.museum *	Restricted	Sponsored

* - ICANN Proof of Concept TLD

Although restricted and sponsored gTLDs such as .museum, .aero or .coop have only been in operation less than a year as part of ICANN's proof of concept, most experts agree that the verification processes used in these gTLDs minimizes the incidence of false and inaccurate Whois data. The biggest problem regarding false and inaccurate Whois data generally involves unsponsored gTLDs. One exception may be .pro that has proposed a professional verification into their registration process. However, the .pro registry is not yet scheduled to be operational until the end of 2002 or early next year.

Unlike gTLDs that have a formal contractual agreement with ICANN, almost all ccTLDs such as .uk (United Kingdom), .de (Germany) and .ca (Canada) have no formal agreement with ICANN. It is important to note that there are significant differences and diversity between ccTLDs and gTLDs. ICANN is currently working with the 240 plus ccTLD administrators to enter into more formal agreements. Specifically, ICANN has proposed a model agreement based on a tripartite agreement between ICANN, the national government and the registry administrator. To date, only two ccTLDs have entered into this proposed model agreement, Japan and Australia. This monumental task confronted by ICANN has been further complicated by the fact that previous delegations of the ccTLDs were to administrators with no formal ties to the national governments.

Although the tripartite agreements are designed to recognize and preserve the sovereignty of the national government, ICANN has incorporated a provision in this model agreement that would require the sponsoring organization to conform to ICANN policies in limited circumstances.

B. Thick Registries versus Thin Registries

Although gTLDs and ccTLDs function the same in how they provide DNS resolution, there are significant differences in the underlying technologies. One of the most important distinctions between registries in connection with Whois accuracy is the distinction between "thick" and "thin" registries.

A thick registry is one in which all of the Whois data is stored within a central registry repository. In contrast, a thin registry only stores limited technical information such as the domain name, name servers, registrar of record, expiration dates etc. The registrant, administrative, technical and billing contacts are all stored in a distributed manner among

the registrars of records. As a result, each of these registrars must provide access to this information through their own Whois server.

Listed below is a chart summarizing the protocol and Whois data distribution of the current gTLD registries:

	Protocol	Thick v. Thin
.com	RRP	Thin
.org	RRP	Thin
.net	RRP	Thin
.info *	EPP	Thick
.biz *	EPP	Thick
.pro *	N/A	Thick
.name *	EPP	Thick
.aero *	SRSIO	Thick
.coop *	N/A	Thick
.museum *	N/A	Thick

* - ICANN Proof of Concept TLD

VII. Registration Authorities Issues Regarding Whois Data Initiatives

Domain name registration authorities, including both registrars and registries, have a vested interest to work with all parties involved in this debate to provide full and open access to accurate Whois data for those parties that need it. However, it is equally important that other parties appreciate the following issues that are important to registration authorities:

A. Continued Open Communication Between IP Owners and Registration Authorities

As chair of the ICANN Registrar Constituency, I strive to maintain an open line of communication between the intellectual property community and the ICANN Registrar Constituency. Over the last six months, the ICANN Registrar Constituency has had two presentations from the intellectual property regarding the accuracy of the Whois data. The first was from a representative from the Motion Picture Association during ICANN's annual meeting in Marina del Rey, California last November. The second was from Joe Keeley from the BSA during a registrar constituency meeting in Dulles, Virginia this past February. Maintaining an active ongoing dialogue allows for the exchange of ideas and continued progress toward a mutually acceptable solution.

B. Pre-Screening

The pre-screening of Whois data at the current time remains neither a technically or economically viable solution for registration authorities. This fact was recently reaffirmed in the recent launch of the ICANN proof of concept TLDs and the .us TLD. Instead, the focus must concentrate on standardizing the processing for identifying and

correcting false or inaccurate data that is brought to the attention of ICANN registrars through third parties.

C. ICANN Board Resolution 02.45

An important step to mitigate some of the effects of false and inaccurate Whois data was taken with ICANN Board resolution 02.45. This resolution provided for the convening of a technical steering group to "to develop a concrete proposal implementing the Redemption Grace Period Proposal." This redemption grace period is designed to provide domain name registrants with a safety net against accidentally deleted names, such as in the OECD case. A technical steering group of registrar and registry representatives has been convened and has already undertake progress toward producing a much needed safety net for domain name registrants, see <http://www.icann.org/announcements/announcement-04apr02.htm>.

D. Bulk Access to Whois

In accordance with Section 3.3.6 of the ICANN Registrar Accreditation Agreement, all ICANN accredited registrars are required to provide bulk-access to their Whois data for an annual fee not to exceed \$10,000. Intellectual property owners and law enforcement may view this provision as a mechanism to integrate Whois data into a valuable investigative tool. However, there are others that view this contractual requirement with less altruistic motives.

I remain a staunch advocate of Whois data being viewed as an open public resource. However the following factors give me cause for concern:

- the initial competitive advantage that NSI/VeriSign registrar had from the legacy Whois data is not as compelling;
- Whois data represents one of the registrar's most valuable assets which it contractually must make available to any third party, including a competitor, for a fixed fee;
- certain registrars attempts to circumvent these contractual requirements and limit access to their Whois data has frustrated legitimate uses of the Whois data;
- the Internet is a global communication medium and the privacy laws of other countries need to be taken into account, particularly when the contractual terms of the ICANN accreditation agreement might subject a registrar in another country to penalties.

Notwithstanding these factors, I remain steadfastly committed to intellectual property owners, law enforcement and other necessary parties, including consumers, having a right to access accurate Whois data to meet their individual needs.

E. Spam/Slamming

Unfettered access to Whois data has resulted in a proliferation of questionable marketing practices by third parties that threatens to undermine legitimate users from maintaining accurate Whois data. Included as attachment # 12 is a series of direct mail solicitations that my wife received in connection with a domain name that she initially registered with another registrar. The hostilities surround these questionable marketing practices continues to escalate and erode user confidence, and has resulted in one of the top-five registrars filing suit to stop the direct-marketing campaign of another top-five registrar.

F. Registrar Whois Data Verification

Despite the controversies, ICANN accredited registrars remain committed toward ensuring the accuracy of Whois data. Included as attachment #13 is an email notification that I recently received from my registrar of record seeking to verify the accuracy of my Whois data. I welcomed this procedure and would encourage other registrars to employ identical or similar mechanism.

VIII. Conclusion

There has been a series of positive steps taken to date to address some of the immediate problems associated with false and inaccurate Whois data, these include:

- ICANN's Registrar Advisory;
- ICANN Board resolution 02.45;
- continued communication between the intellectual property community and registration authorities;
- efforts by ICANN registrars to periodically re-verify Whois data; and
- a trend among ICANN proof of concept gTLD registries toward thick registries with centralized Whois data.

These positive steps do not indicate the end of a journey, merely its beginning. Issues that loom on the horizon and which will directly impact a permanent solution to Whois data accuracy include the following:

- successful restructuring of ICANN;
- design and adoption of uniform mechanisms for third parties to report claims of false or inaccurate Whois data;
- viability of a central repository to track Whois verification requests to registrars;
- usefulness of standard email address for each registrar to maintain for third parties to report false or inaccurate Whois data; and
- outreach to all Internet users and interested parties effected by Whois data issues but which are not presently included in the current debate;

ATTACHMENT #1

**Large-Scale Intentional Invalid WHOIS Data:
A Case Study of "NicGod Productions" / "Domains For Sale"
(<http://cyber.law.harvard.edu/people/edelman/invalid-whois/>)**

by

Mr. Ben Edleman

Large-Scale Intentional Invalid WHOIS Data: A Case Study of "NicGod Productions" / "Domains For Sale"

[[Overview](#) - ["Domains For Sale"](#) - [Types of WHOIS Errors](#) - [Specific Domains](#) - [Summary Statistics](#) - [Conclusions](#) - [Policy Implications](#) - [Motivation](#)]

Overview

In recent years, many Internet users have become aware that domain name registrants do not always offer accurate contact information. The distributed "WHOIS" database storing and distributing this contact data is generally thought to be important for correcting technical errata, resolving disputes over domain name allocation, and holding web site operators responsible for the content they distribute. A series of contracts, from ICANN to registrars to registrants, requires that contact data be complete and accurate, but nonetheless certain registrants fail to properly provide the required contact information.

While many WHOIS errors likely result from accidental error in data entry or data processing, certain registrants have been found to intentionally provide systematically inaccurate contact information to registrars for inclusion in the WHOIS database. Such fraud can include the entry of invalid street addresses and phone numbers, i.e. contact information that in fact reaches no one, or it can instead offer as the purported registrant of a domain some third party in fact wholly unrelated to the domain.

In recent research, I have documented 988 domains reregistered by one particular firm known for its widespread use of invalid WHOIS contact information. The majority of these domains redirect users to a single web page displaying a list of links to content that is, by and large, unrelated; the remaining domain names provide access to sexually-explicit images. While this research is by no means exhaustive -- other firms likely follow similar registration practices, and still others make numerous invalid registrations and reregistrations that no doubt differ in various ways -- a review of these specific registrations as well as their general characteristics may be helpful in understanding the behavior at issue.

A Case Study: "Domains For Sale" Reregistrations by an Undetermined Registrant

DNS zone files, default HTTP response pages, and WHOIS contact information reflect that a firm calling itself "NicGod Productions" and "Domains For Sale" (henceforth, "NicGod") operates some 900+ domain names that by and large redirect to a page that offers a list of links unrelated to the requested domain. A subset of NicGod's domains offer sexually-explicit images on a paid subscription basis.

NicGod's 988 domains include a wide variety of character strings. The vast majority of domain names explicitly suggest specific content other than what is present on the subsequent list of links -- for example, [angry-kids.com](#), [californiastateuniversity.com](#), [doctorjohn.com](#), [polygram-us.com](#), [reform-party-usa.org](#), and [winthrop-police.com](#).

It seems that most or all of NicGod's domains were previously held by other registrants.

According to archive.org, at least 637 (64%) of NicGod's domains previously offered HTML titles suggesting the availability of other content, precisely indicating that the domains were previously put to another use before registration by NicGod. Some 108 (11%) of NicGod's domains continue to be listed in Yahoo, in categories reflecting the prior availability of content other than the current NicGod listing of links. Similarly, some 774 (78%) of NicGod's domains are mentioned on one or more other pages, as reported by Google; these many outside references further suggest that the NicGod domains previously hosted other content. In this regard, NicGod's registration practices seem to be similar to those documented by this author in his April 2002 [Domains Reregistered for Distribution of Unrelated Content: A Case Study of "Tina's Free Live Webcam"](#).

A review of the current registrants of domains previously held by NicGod suggests that certain registrants, among them the major American firms of Hewlett-Packard and AOL, are coming to hold certain domains held by NicGod as recently as March of 2002. These firms may be purchasing the domains at issue from NicGod or may be using a UDRP or similar challenge to obtain the domains.

WHOIS Errors and "Tricks": NicGod's Methods for Keeping Its Identity Secret

A review of NicGod registration practices shows a variety of techniques used to keep secret the identity, location, and contact information of the NicGod staff.

The NicGod domains are notable for their wide variety of registration methods and purported contact locations. NicGod's domains use a total of eleven distinct registrars; leading registrars are Dotster (377 domains), Bulkregister (343), Namescout (113), enom (71), and iHoldings / dotRegistrar (62). Furthermore, NicGod provides at least nine distinct countries for registration of its various domain names, including Armenia, Bulgaria, Canada, Estonia, Germany, Hong Kong, the Netherlands, Russia, and the United States. A series of investigations has shown various of these addresses to be invalid. ([International Herald Tribune](#))

In addition to using a large number of invalid addresses for the registration of its domains, in many instances NicGod seems to enter the names of one or more well-known individuals as the purported registrant of its domains. For example, some 425 NicGod domains falsely purport to be registered by [Allen Ginsberg](#), a deceased American poet. For other domain registrations, NicGod uses a variety of company names – including "Domain ForSale," "Grakial Kompilations," "Triple Zero Networks," and "Merkus, Matching."

Many of the domains registered by NicGod offer a telephone and fax contact in the United States. The given phone number is a voice mail box in the 309 area code assigned to Bloomington, Illinois. Reviewing [documentation gathered by the OECD](#), it seems likely that NicGod purchases this service from an Illinois voice mail firm, but that NicGod itself has no presence in Illinois. This author attempted to contact NicGod at the given number, but received no response.

[Data collected by Patrick Jones of UDRPlaw.net](#) suggests that NicGod has faced at least 27 challenges under the [Uniform Domain-Name Dispute Resolution Policy](#) (UDRP) but has in every instance failed to respond to complaints. It is possible that staff of NicGod would prefer to forfeit their domains under the UDRP, rather than reveal their identity by responding to a UDRP

complaint; alternatively, staff of NicGod may not receive UDRP complaints precisely as a result of the invalid contact data provided by NicGod to its registrars.

Of course, even NicGod's methods may be inadequate for keeping secret its identity. Most or all NicGod domains are hosted at dslextrame.com, an ISP in Canoga Park, California; it is possible that this firm knows the true identity and location of NicGod, information that it might have obtained in the course of billing or customer support. Alternatively, any of NicGod's registrars might know the firm's identity location from similar interactions. It is possible that any or all of these firms might disclose known information on the basis of a subpoena.

Specific Domain Registrations with Invalid Contact Data

In recent testing and archiving, I have prepared a listing of a total of 988 distinct domains that are (or recently were) registered to (or by) NicGod, and that likely offer (or recently offered) invalid contact data.

For each domain, I have attempted to obtain a variety of information including:

- Current title of default web page (as of May 11, 2002)
- Date of domain registration by current registrant, when available from registrar; name of current registrar
- Prior page title, when available from archive.org (as of approximately January 1, 2000)
- Prior META DESCRIPTION and KEYWORDS tags, when available from archive.org (as of approximately January 1, 2000)
- Current Yahoo category, when available from Yahoo (as of May 11, 2002)
- Other pages referencing or linking to domain, when available from Google (with counts as of May 11, 2002)
- The number of times the domain's default web page was accessed by [Alexa](http://www.alexa.com) users between December 2001 and May 2002, with rank data when available
- The domain's registrant and administrative contact of record (as of May 11, 2002)
- Access to page archives, when available from archive.org

The results of this data collection effort are freely and publicly available. Due to the large size of the listing of results, the listing is provided in sections by first letter of domain name:

[A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#) [Q](#) [R](#) [S](#) [T](#) [U](#) [V](#) [W](#) [X](#) [Y](#) [Z](#) numbers

Summary Statistics

Of the 988 distinct domains registered to NicGod, 848 currently point to listings of links with pop-up advertising and possible click-through sponsorship. Of the remaining 140 domains, at least some have been transferred to other registrants (among them AOL and HP), and at least 23 offer sexually-explicit images.

According to current testing in Google, 774 of NicGod's domains (78%) are mentioned in one

or more web pages (as via a link or a textual reference to the domain name).

Yahoo continues to classify 108 of NicGod's domains (11%) into its hierarchical directory categories. In a casual inspection, none of these categories seems to properly characterize the content available from NicGod.

Archive.org reports that at least 637 (64%) of NicGod's domains previously contained a title suggesting the availability of other content.

NicGod uses at least eleven different registrars (primarily Dotster, Bulkregister, and Namescout) and uses multiple registration addresses in at least nine distinct countries. Contact information in some registrations invokes the names of well-known individuals who are deceased as well as unaffiliated with NicGod.

Of NicGod's domains, Alexa toolbar logs reflect that the most popular were ITLIBRARY.COM (previously a resource about information technology) and ASCGAMES.COM (a computer game developer site). In the past six months, these sites received 131788 and 59361 accesses, respectively, from users of the Alexa toolbar -- making them, at least among Alexa users, the 3161th and 6877th most popular sites on the web. A total of 69 of NicGod's domains received more than 100 requests from Alexa users in the past six months -- suggesting that many of NicGod's domains were and remain relatively popular.

Possible Conclusions

While the data linked above is but a single case study of what is known to be a more widespread phenomenon, it is nonetheless possible to draw certain conclusions on the basis of work completed to date. Possible conclusions include the following:

- There exist substantial numbers of registrations with intentionally-invalid WHOIS contact information, and at least some registrants take significant deliberate steps to obfuscate their true identities and locations.
- Of registrants providing intentionally-invalid WHOIS contact information, at least some register and hold large number of domains.
- The problems with DNS are interrelated in the sense that those who provide invalid WHOIS contact information may also engage in other activities of concern. For example, registrants offering invalid WHOIS contact information may tend to be the same registrants who reregister large numbers of domains for the distribution of unrelated and/or sexually-explicit materials, or who offer sexually-explicit material on domain names that do not immediately suggest the availability of such materials.
- Links and other online references continue to point to domain names even many months after those domains have come to host content inconsistent with the suggestion of the linking or referencing pages. This phenomenon holds both for relatively small linking entities (i.e. ordinary web pages) as well as large firms (such as Yahoo).
- The domains registered by NicGod are not "forgotten" or "unimportant." Indeed, many of these domains receive or previously received many thousands, if not millions, of accesses per year.

Future Work, Discussion, and Policy Implications

This work has focused on only several hundred registrations by a particular single firm. While that firm is in some circles notorious for the invalid data it enters into the WHOIS database, it would be desirable to collect additional data so as to better understand the scope of the problem. Unfortunately, large-scale analysis is difficult because it is in many instances time-consuming, difficult, and costly to determine whether or not a given contact is in fact invalid. Future work will seek to develop additional automated methods for verifying telephone numbers, for cross-checking telephone numbers with street addresses, and for otherwise recognizing suspect trends in WHOIS data. To this end, the author welcomes submission of additional examples of domains with intentionally-invalid contact information; send such submissions [to the author](#).

While a full policy analysis is beyond the scope of the current project, available data suggests that existing work by registrars and ICANN has been unsuccessful in assuring the accuracy of WHOIS data. Instead, systematic errors have remained over time, and known-abusers have continued to register at least hundreds of domains without providing valid contact information.

In this context, ICANN's recent [Registrar Advisory Concerning Whois Data Accuracy](#) seems arguably too limited to fully and efficiently address the entire problem at hand. Instead, when a given domain is found to contain invalid contact information, and when this contact information is found to be intentionally invalid, a registrar might consider canceling *all* of that registrant's domains rather than only a particular single domain. (To reduce the risk of error, the registrar would of course first use all available methods to attempt to contact the registrant. Furthermore, the domains at issue would initially be placed into some sort of "hold" status wherein they do not function on the Internet yet, for a limited time, can be returned only to the prior registrant but not to any other interested party.)

[John Berryhill](#) points out that improvements in the accuracy of the WHOIS database may have a dual effect -- first, as expected, to increase the ability of interested parties to learn the identity of the registrant of a given domain; second, to use that registrant's contact information to induce the registrant to transfer the domain to some other registrar or to otherwise defraud the registrant. ([More information about domain name scams from the FTC.](#))

Some registrants may prefer to keep their contact information confidential. ICANN's Registrar Accreditation Agreement anticipates this possibility and therefore allows registrars to hold registrants' valid contact information in trust, while publishing in WHOIS only a placeholder address. Certain third-party firms provide a similar service. Note, however, that these intermediary services are separate and distinct from the large-scale intentional entry of invalid contact information that is the subject of this document's discussion and of which NicGod is an example.

Motivation

The purpose of this work is primarily academic – to document the activity at issue for the benefit of those who seek to make policy decisions on related matters. In the context of ICANN's recent [Registrar Advisory Concerning Whois Data Accuracy](#) as well as associated Congressional [hearings](#), the availability of this data and analysis is intended to be helpful to policy-makers and other interested parties.

This page is made available to inform discussion about the registration of Internet domain names. The data contained here is not intended for use for other purposes, and it should not be used for other purposes without first contacting the author.

In order to confirm the results of my testing and to attempt to obtain certain other information, I attempted to reach the contacts listed in certain of the WHOIS records of domains registered by NicGod. I have to date received no reply. Comments from NicGod staff remain welcome, as are comments from others interested; with the permission of the author, comments may be posted or linked from this page as appropriate.

Ben Edelman

Last Updated: May 12, 2002 - [Notify me of major updates and additions to this page.](#)

This page is hosted on a server operated by the [Berkman Center for Internet & Society at Harvard Law School](#), using space made available to me in my capacity as a Berkman Center affiliate for academic and other scholarly work. The work is my own, and the Berkman Center does not express a position on its contents.

ATTACHMENT #2

**A Two Month Chronology of Events Involving Actions Taken
by Michael D. Palage to Correct Outdated Information
Associated With the Domain Name palage.com**

Chronology of Events in Connection with Correcting Outdate Whois Data Associated with the Domain Name palage.com

September 14, 2001

I realized that the email (mpalage@infonetworks.com) associated with my domain palage.com was out of date, I went to my registrar's website in attempt to update this information, see attachment #3.

One of the principal mechanisms used by registrars to verify changes in Whois data along with transfer requests is email confirmation, see attachment #4. However, this was not possible because the administrative contact email associated with the domain name was no longer in operation.

I then went back to my registrar's web site and filled in an online questionnaire, see attachment #5.

September 18, 2001

My registrar responded several days latter to my online inquiry providing me instructions on how to update my Whois data if my email was no longer functional, see attachment #6.

These instructions included the following:

It will then be necessary to send a fax to 703-326-7000. Please include the following:

- a) If the Contact handle is registered as a role or to a company (ORG), the request must be on company letterhead.
- b) If the request is to update a Contact record that is registered to a person, a photo-copy of a state issued ID or passport. Please be sure to enlarge and lighten your photo-copy so that your transmission will be legible.
- c) Tracking # of your original email request to our hostmaster---see above
- d) If the Contact record is registered to a person, the signature of the Contact If the Contact record is registered as a role or to a company, a signature and title of an officer who can legally bind the company.
- e) Phone number and email address.

October 19-26, 2001

Included as attachment #7 is the documentation that I submitted to my registrar via facsimile. I have redacted those sections of the documentation that include a copy of my passport and driver's license. I submitted this documentation to my registrar a total of three times over an eight-day period of time, see attachment #8.

November 8, 2002

Proof of payment after initial registration expired without being able to transfer to another registrar, see attachment #9.

ATTACHMENT #3

Online Request to Update the Administrative Contact Email Associated With the Domain Name palage.com



> HOME > MAKE CHANGES > PRODUCTS & SERVICES > SITE MAP > HELP



Manage Your Account

[> Back to Home Page](#)

[URL ftp://www.networksolutions.com/templates/contact-template.txt] [5/

***** Please DO NOT REMOVE Version Number *****

Contact Version Number: 1.0

***** Please see attached detailed instructions *****

Authorization

- 0a. (N)ew (M)odify (D)elete.: Modify
- 0b. Auth Scheme.: MAIL-FROM
- 0c. Auth Info.:

Contact Information

- 1a. NIC Handle.: MDP563
- 1b. (I)ndividual (R)ole.: Individual
- 1c. Name.: Palage, Michael D
- 1d. Organization Name.:
- 1e. Street Address.: 73 Camelia Circle
- 1f. City.: Tequesta
- 1g. State.: FL
- 1h. Postal Code.: 33469
- 1i. Country.:
- 1j. Phone Number.: (561) 744-6453
- 1k. Fax Number.:
- 1l. E-Mailbox.: michael@palage.com

Notify Information

- 2a. Notify Updates.:
- 2b. Notify Use.:

Authentication


- 3a. Auth Scheme.: MAIL-FROM
- 3b. Auth Info.: michael@palage.com
- 3c. Public (Y/N): NO



HOME | MAKE CHANGES | PRODUCTS & SERVICES | SITE MAP | HELP


ATTACHMENT #4

Online Registrar Confirmation of Request to Update the Administrative Contact Email Associated With the Domain Name palage.com



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A VeriSign[®] Company



[> HOME](#) [MAKE CHANGES](#) [> PRODUCTS & SERVICES](#) [> SITE MAP](#) [> HELP](#)

 **Manage Your Account** [> Back to Home Page](#)

A copy of the form you created has been mailed to you at: mpalage@infonyetworks.com

Once you receive the Contact Form, you must E-mail it to HOSTMASTER@NETWORKSOLUTIONS.COM

After you E-mail the form to the hostmaster, you should receive an auto-reply with a tracking number. Use that number as the subject of any future messages you send regarding this registration action. Once this registration action is completed you will receive a notification via E-mail.


 <p>Secure and certify your website, secure your e-mail, and accept online credit card payments with services from VeriSign.</p>	 <p>MyComputer.com Tools to power your eBusiness Stats, Counters, Guestbooks, Message Boards, Search Engine Submission</p>
---	--

[HOME](#) | [MAKE CHANGES](#) | [PRODUCTS & SERVICES](#) | [SITE MAP](#) | [HELP](#)


Questions? [Contact Us](#).
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Please read our [Disclaimer](#).


ATTACHMENT #5

Online Request to Update the Administrative Contact Email From a Non-Functioning Email Account

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A VeriSign® Company

> HOME | > MAKE CHANGES | > PRODUCTS & SERVICES | > SITE MAP | HELP

Register a Web Address (domain name): .com 

 [Contact Us Via E-mail](#) > [Back to Previous Page](#)

You have a question about How Do I for the domain name palage.com.

Please select the statement that most closely matches your question from the list below.

Your Name:

E-mail Address: *

(Example: your-

name@yourmailaddress.com)

* Required. We will send a reply to this address. It will NOT be added to any mailing list.

Please enter your Reference or Tracking Information below.

Service Request

Number:

(Example: 1-A1B2C)

NicTracking Number:

(Example: NIC-000605.1efc3)

Please type your question below. Be sure to give us complete details so that we are best able to help you.

I need to update the Admin, Billing and Technical contact associated with the domain name palage.com. The email account mpalage@infonetworks.com is no longer valid. Please advise on how to resolve this problem. I need to update this email address so that I can transfer my domain name to another registrar prior to its expiration next month.



HOME

MAKE CHANGES

PRODUCTS & SERVICES

SITE MAP

HELP

ATTACHMENT #6

**Instructions from Registrar on How to Update Administrative
Contact Email**

Michael D. Palage

From: Help Role Account [help@networksolutions.com]
Sent: Tuesday, September 18, 2001 4:54 PM
To: michael@palage.com
Subject: Re: [NIC-010914.279e] How do I update a contact record?

Thank you for contacting Network Solutions.

Below you will find instructions to assist you in making changes to your contact record:

1) To begin this process, please go to:
<http://www.networksolutions.com/cgi-bin/makechanges/itts/handle>

2) Put in your current email and NIC handle, and click the button next to "Modify" to change your current information on record.

(If you are unsure of your NIC handle, please click the following link and type in your domain-your NIC handle will be a set of numbers and letters to the right of your name on your contact record):

<http://www.networksolutions.com/cgi-bin/whois/whois>

The first screen will ask what your current Authentication Method is, (if you have not previously selected a method, scroll down to the bottom and click "Proceed to Contact Information".) If you have previously selected a modification, please click the button next to the appropriate method.

3) At the next screen you may change any information to your record. Once finished, click "Proceed to Set Authorization Scheme". This will allow you to pick an authorization method to approve changes to a domain/contact/host record.

4) Once completed a form will be sent to your email address; forward that form to: Hostmaster@networksolutions.com

5) You should receive 2 or 3 messages to the email address you provided. There will be a tracking number in the header of these messages NIC with some numbers and letters; please note this for your records. You should receive the following:

- a) A message stating we have received your request
- b) A message stating we can't authorize your request
- c) A NOTIFY message asking if you approve the request

NOTE: The NOTIFY message is sent to the current contact email address on record; if you are a contact and your email address on file is invalid you will not receive the NOTIFY message.

6) If you receive and approve the request in the NOTIFY message we will make the changes for you.

7) As stated above, if your email address has changed, you will not

receive the NOTIFY message. It will then be necessary to send a fax to 703-326-7000. Please include the following:

- a) If the Contact handle is registered as a role or to a company (ORG), the request must be on company letterhead.
- b) If the request is to update a Contact record that is registered to a person, a photo-copy of a state issued ID or passport. Please be sure to enlarge and lighten your photo-copy so that your transmission will be legible.
- c) Tracking # of your original email request to our hostmaster---see above
- d) If the Contact record is registered to a person, the signature of the Contact
If the Contact record is registered as a role or to a company, a signature and title of an officer who can legally bind the company.
- e) Phone number and email address.

Please know that we appreciate your patience in this regard, and your continued business.

Sincerely,

Network Solutions, a VeriSign company
<http://www.networksolutions.com>

Need your records updated in a hurry? For \$29.95, our Priority Services team can process your modifications within one business day. Restrictions may apply. Call us Monday to Friday, 7 a.m. to 9 p.m. to speak with a customer service representative. Within the U.S. and Canada, dial 1-800-779-1710. Internationally, dial +1 703 742-4777.

```
>From nobody@www6.networksolutions.com Fri Sep 14 12:51:45 2001
Received: from www6.networksolutions.com (www6.mgt.netsol.com [192.168.222.54])
    by opsmail.prod.netsol.com (8.9.3/8.9.1) with ESMTP id MAA06905
    for <webformmail@networksolutions.com>; Fri, 14 Sep 2001 12:51:40 -0400 (EDT)
Received: (from nobody@localhost)
    by www6.networksolutions.com (8.8.8+Sun/8.8.8) id MAA29166;
    Fri, 14 Sep 2001 12:51:38 -0400 (EDT)
Date: Fri, 14 Sep 2001 12:51:38 -0400 (EDT)
Message-Id: <200109141651.MAA29166@www6.networksolutions.com>
To: webformmail@networksolutions.com
    michael@palage.com
Subject: [NIC-010914.279e] How do I update a contact record?
X-MTS-Ticket: 010914.279e
X-MTS-Type: Question
X-MTS-Mode: Unknown
X-MTS-Priority: Normal
X-MTS-Status: Open
X-MTS-Timestamp: 010914125146
Status: OR
```

name: Michael D. Palage
comment: I need to update the Admin, Billing and Technical contact associated with the domain name palage.com. The email account mpalage@infonetworks.com is no longer valid. Please advise on how to resolve this problem. I need to update this email address so that I can transfer my domain name to another registrar prior to its expiration next month.

domain: palage.com
email: michael@palage.com
service_request:
topic_id: ISP3HDI
topic: How do I update a contact record?
nictrack:
type: ISP-hosted

ATTACHMENT #7

**Facsimile to Registrar to Correct Inaccurate Whois Data
(passport and driver's license information has been redacted)**

To:
703-326-7000

NIC-010914.279e

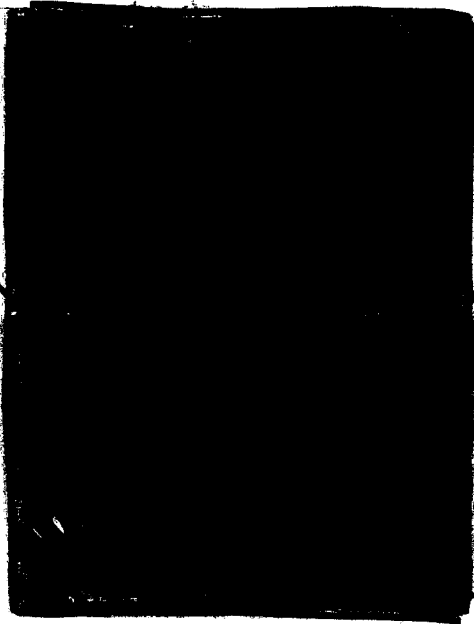
I AM the contact
PERSON for the
DOMAIN NAME
PALAGE.COM

I hereby request
modification of
my whois information
to reflect my proper
email address
michael@PALAGE.com

My phone number

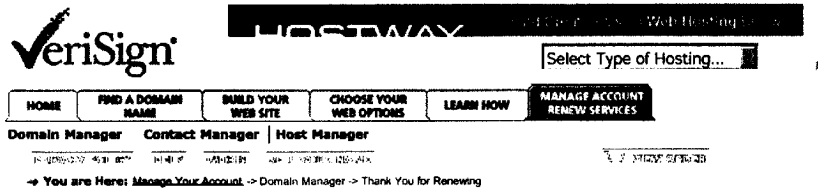
AS properly reflected in the current whois
IS (561) 744-6453.

Best Regards,
Michael D. Palage
michael D. Palage



ATTACHMENT #9

Proof of Payment After Initial Registration Expired Without Being Able to Transfer to Another Registrar



The screenshot shows the VeriSign website navigation menu. At the top left is the VeriSign logo. To its right is a 'HOSTWAY' banner with the text 'Web Hosting'. Below the banner is a search bar labeled 'Select Type of Hosting...'. The main navigation menu consists of several buttons: 'HOME', 'FIND A DOMAIN NAME', 'BUILD YOUR WEB SITE', 'CHOOSE YOUR WEB OPTIONS', 'LEARN HOW', and 'MANAGE ACCOUNT RENEW SERVICES'. Below the menu are links for 'Domain Manager', 'Contact Manager', and 'Host Manager'. A breadcrumb trail at the bottom reads: '→ You are Here: Manage Your Account → Domain Manager → Thank You for Renewing'.

MANAGE YOUR ACCOUNT
Thank You for Renewing

Please print this page as a record of your renewal request.

You should receive an e-mail within 24 to 48 hours confirming your renewal request has been processed. Please wait until you receive this e-mail before considering this transaction complete.

Thank you for renewing your domain name (Web address) with Network Solutions®, A VeriSign Company®.

Today's Date & Time: 11/8/2001 9:46AM EDT
New expiration Date: 11/6/2002
Domain Name

Domain Name	Renewal Term
palage.com	1 years
Total: \$35.00	

* The renewal term you are allowed may be less than displayed due to ICANN's 10-year aggregate term restriction. You will only be charged for the allowable renewal term.

Your new expiration date will be updated in our [WHOIS database](#) with 24 to 48 hours.

Network Solutions®, Inc.
A VeriSign® Company
505 Huntmar Park Drive
Herndon, VA 20170
USA

Inktomi Search/Si

Click to find out [more detail](#) our new service which gives site owners the assurance t their Web pages 'get in' and in' top search sites on the W

For Your Informa

Interested in selling any of your names? [Click here](#) to find out ho



ATTACHMENT #10**ICANN Registrar Advisory Concerning Whois Data Accuracy
(dated 10 May 2002)****Advisory**
10 May 2002

Registrar Advisory Concerning Whois Data Accuracy

The purpose of this advisory is to assist ICANN-accredited registrars in understanding their obligations under ICANN's Registrar Accreditation Agreement (RAA) regarding the accuracy of Whois data. Registrars are required to obtain contact information from registrants, to provide it publicly by a Whois service, and to investigate and correct any reported inaccuracies in contact information for names they sponsor. The following advisory will outline the relevant provisions of the RAA and suggest steps registrars can take to ensure they fulfill their obligations with respect to Whois data accuracy.

Relevant Provisions of the Registrar Accreditation Agreement

Several provisions of the RAA are relevant to the accuracy of registrar Whois data. They include:

A. Providing Whois Service

3.3.1 At its expense, Registrar shall provide an interactive web page and a port 43 Whois service providing free public query-based access to up-to-date (i.e., updated at least daily) data concerning all active Registered Names sponsored by Registrar for each TLD in which it is accredited. The data accessible shall consist of elements that are designated from time to time according to an ICANN adopted specification or policy. Until ICANN otherwise specifies by means of an ICANN adopted specification or policy, this data shall consist of the following elements as contained in Registrar's database:

3.3.1.1 The name of the Registered Name;

3.3.1.2 The names of the primary nameserver and secondary nameserver(s) for the Registered Name;

3.3.1.3 The identity of Registrar (which may be provided through Registrar's website);

3.3.1.4 The original creation date of the registration;

3.3.1.5 The expiration date of the registration;

3.3.1.6 The name and postal address of the Registered Name Holder;

3.3.1.7 The name, postal address, e-mail address, voice telephone number, and (where available) fax number of the technical contact for the Registered Name; and

3.3.1.8 The name, postal address, e-mail address, voice telephone number, and (where available) fax number of the administrative contact for the Registered Name.

B. Required Provisions in Service Agreements with Registrants

3.7.7 Registrar shall require all Registered Name Holders to enter into an electronic or paper registration agreement with Registrar including at least the following provisions:

3.7.7.1 The Registered Name Holder shall provide to Registrar accurate and reliable contact details and promptly correct and update them during the term of the Registered Name registration, including: the full name, postal address, e-mail address, voice telephone number, and fax number if available of the Registered Name Holder; name of authorized person for contact purposes in the case of an Registered Name Holder that is an organization, association, or corporation; and the data elements listed in Subsections 3.3.1.2, 3.3.1.7 and 3.3.1.8.

3.7.7.2 A Registered Name Holder's willful provision of inaccurate or unreliable information, its willful failure promptly to update information provided to Registrar, or its failure to respond for over fifteen calendar days to inquiries by Registrar concerning the accuracy of contact details associated with the Registered Name Holder's registration shall constitute a material breach of the Registered Name Holder-registrar contract and be a basis for cancellation of the Registered Name registration.

3.7.7.3 Any Registered Name Holder that intends to license use of a domain name to a third party is

license use of a domain name to a third party is nonetheless the Registered Name Holder of record and is responsible for providing its own full contact information and for providing and updating accurate technical and administrative contact information adequate to facilitate timely resolution of any problems that arise in connection with the Registered Name. A Registered Name Holder licensing use of a Registered Name according to this provision shall accept liability for harm caused by wrongful use of the Registered Name, unless it promptly discloses the identity of the licensee to a party providing the Registered Name Holder reasonable evidence of actionable harm.

C. Registrar Obligation to Correct Inaccurate Data

3.7.8 Registrar shall abide by any specifications or policies established according to Section 4 requiring reasonable and commercially practicable (a) verification, at the time of registration, of contact information associated with a Registered Name sponsored by Registrar or (b) periodic re-verification of such information. Registrar shall, upon notification by any person of an inaccuracy in the contact information associated with a Registered Name sponsored by Registrar, take reasonable steps to investigate that claimed inaccuracy. In the event Registrar learns of inaccurate contact information associated with a Registered Name it sponsors, it shall take reasonable steps to correct that inaccuracy.

In summary, based on the above provisions, a registrar must:

- Require each registrant to submit (and keep updated) accurate contact details (3.7.7.1);
- Provide both a web-based and Port 43 Whois service providing access to complete contact information for all TLDs covered under the RAA (3.3.1);
- Require registrants to agree that willfully submitting inaccurate contact details (or failing to respond within 15 days to an inquiry regarding accuracy) shall be a basis for cancellation of the registration (3.7.7.2); and,
- Take reasonable steps to investigate and correct the contact details in response to any reported inaccuracy (3.7.8).

Requiring Registrants to Provide Accurate Data

Subsection 3.7.7.1 of the RAA requires registrars to include in their registration

agreement with each registrant a provision under which the registrant promises to "provide to Registrar accurate and reliable contact details and promptly correct and update them" Although 3.7.8 envisions that ICANN may develop a policy requiring registrars to verify the contact details at the time of registration, ICANN has not yet done so. Nonetheless, registrars will find that implementing readily-available techniques to verify the format of data in the registration process (such as screening for blank fields or checking that addresses have valid post codes) will diminish the need for manual processes that would later be necessary to comply with the requirement to investigate reported inaccuracies.

Obligation to Investigate and Correct Reported Inaccuracies

Subsection 3.7.8 of the RAA obliges registrars to "take reasonable steps to investigate" any inaccuracy in Whois data upon notification from "any person." In order to facilitate compliance with this responsibility, registrars should establish a clear mechanism for receiving, investigating, and tracking reported inaccuracies in their Whois data. In the absence of a clearly designated contact or channel for receiving complaints about inaccurate Whois data, registrars are responsible for acting upon "notifications" that may be received by diverse, and even informal, means. This may make it difficult for registrars to fulfill their obligations.

Once a registrar receives notification of an inaccuracy, Subsection 3.7.8 requires the registrar to take "reasonable steps" to investigate and correct the reported inaccuracy. The term "reasonable steps" is not defined within the agreement; precisely what constitutes reasonable steps to investigate and correct a reported inaccuracy will vary depending on the circumstances (e.g., accepting unverified "corrected" data from a registrant that has already deliberately provided incorrect data may not be appropriate). At a minimum, "reasonable steps" to investigate a reported inaccuracy should include promptly transmitting to the registrant the "inquiries" concerning the accuracy of the data that are suggested by RAA Subsection 3.7.7.2. The inquiries should be conducted by all commercially practicable means available to the registrar: by telephone, e-mail, and postal mail.

Cancellation of Registrations in the Event of Material Breach by the Registrant

If the registrant fails to respond "for over fifteen calendar days to inquiries by Registrar concerning the accuracy of contact details", then pursuant to RAA Subsection 3.7.7.2 the registrant is in "material breach" of its registration agreement with the registrar. That subsection also provides that "willful provision of inaccurate or unreliable information" shall constitute a material breach of the registration agreement. Under either of these circumstances, the RAA provides that the material breach of the registration agreement shall be "a basis for cancellation of the Registered Name registration." Accordingly, if the registrar's investigation results in a determination that the registrant is in material breach of its registration agreement, then in the absence of extenuating circumstances the registrar should cancel the domain registration.

Applicability to Resellers

The registrar obligations outlined above (as well as all other registrar obligations under the RAA) apply with equal force to all registrations sponsored by a registrar in any TLD for which it is accredited by ICANN, whether those registrations were placed directly with the registrar or through some agent or reseller. In other words, registrars are responsible for providing Whois data (and correcting any reported inaccuracies in that data) for all names under their sponsorship, including the data pertaining to customers of their resellers.

Conclusion

This advisory is being published to promote registrar and community understanding about registrar's current obligations under ICANN's Registrar Accreditation Agreement with respect to Whois data accuracy. Interested members of the community should also be aware that ICANN's Domain Name Supporting Organization has convened a Whois Task Force to review and possibly suggest improvements to current ICANN policy and agreements relating to Whois. Anyone interested in contributing to the development of such policies through ICANN's bottom-up, consensus-based policy development system is invited to visit <http://www.icann.org/participate/> to learn how to participate.

Please contact Dan Halloran, ICANN's Chief Registrar Liaison, with any questions or comments relating to ICANN registrar accreditation and Whois requirements.

ATTACHMENT #11

Excerpt from NeuStar's Proposal to Become the Registry Operator for .us

NeuStar Response to SB1335-01-Q-0740



- The registrar name and URL or, where appropriate, the identity of the delegated manager under which the name is registered;
- The original creation date and term of the registration;
- The name and postal address of the domain name registrant;
- The name, postal address, e-mail address, voice telephone number, and (where available) fax number of the billing contact for the name registered;
- The name, postal address, e-mail address, voice telephone number, and (where available) fax number of the technical contact for the name registered; and
- The name, postal address, e-mail address, voice telephone number, and (where available) fax number of the administrative contact for the name registered.

Whois service will be subject to certain terms and conditions. The additional terms and conditions are intended to prevent the unauthorized use of Whois information for purposes such as unsolicited marketing, e-mail (spamming), and other unlawful purposes.

When requesting the Whois report, the requestor must provide the following information:

- A declaration that the data is being requested for a lawful reason, and that the data will not be used for marketing purposes, spamming, or any other improper purpose.
- A declaration that the reason for collecting the data is to protect legal rights and obligations. Such a reason could be, but is not limited to:
 - Investigating and defending a possible violation of intellectual property
 - Seeking information for use by a law enforcement agency or consumer protection group
 - Information collected for use within the applicable Dispute Resolution Procedures under the usDRP or Nexus Dispute Policy, or
 - Gathering or collecting information in pursuit of enforcing legal rights and/or remedies
- The name, postal address, e-mail address, voice telephone number and (where available) fax number of the requestor, and declaration that this information is correct.

Data collected from or about requestors will be used only to document the request and will not be used for any commercial purpose whatsoever.

NeuStar will reserve the right to prevent access to the Whois service to any individual, entity, or organization that it has reason to believe has violated the above terms and conditions of the Whois service.

Enforcement of Accurate Contact and Whois Information

Section 3.7.7 of the draft Registrar Accreditation Agreement provides in pertinent part that a Registrar shall require all registrants to enter into a registration agreement with a registrar including at least the following provisions:

3.7.7.1 [Registrant] shall provide to Registrar accurate and reliable contact details and promptly correct and update them during the term of the [Registrant] registration, including: the full name, postal address, e-mail address, voice telephone number, and fax number if available of the [Registrant]; name of authorized person for contact purposes in the case of an [Registrant] that is an



organization, association, or corporation; and the data elements listed in Subsections 3.3.1.2, 3.3.1.7 and 3.3.1.8.

3.7.7.2 A [Registrant]'s willful or grossly negligent provision of inaccurate or unreliable information, its willful or grossly negligent failure promptly to update information provided to Registrar, or its failure to respond for over fifteen (15) calendar days to inquiries by Registrar concerning the accuracy of contact details associated with the [Registrant]'s registration shall constitute a material breach of the [Registrant]'s Registration Agreement with the registrar and be a basis for cancellation of the [Registrant] registration.

Although this requirement has been in ICANN's Accreditation Agreement for Registrars in the .com, .net and .org TLDs since 1998, historically, the registrar community has largely ignored these provisions. As a result, this has led to an increase in inaccurate, false or out of date information in the Whois database.

NeuStar, as the administrator for the usTLD, will adopt additional provisions in both the Accreditation Agreement, the Registry-Registrar Agreement, and the Delegated Manager Agreement that would ensure that registrars and delegated managers take affirmative steps to enforce its agreements with its own registrants. For Example, NeuStar will require that registrars accept written complaints from third parties regarding false and/or inaccurate Whois data of domain name registrants. No later than thirty (30) days after receipt of a written complaint, the registrar shall be required to conduct an initial investigation into the accuracy of the Whois contact information. If the registrar determines that the information is either false, inaccurate or not up to date, the registrar will be required to issue a notice to the registrant stating that it believes that the information contained in the registrant's Whois record may be false, inaccurate or not up to date. The registrant shall be required to update its contact information no later than thirty (30) calendar days of the date of such notice. If, within thirty (30) days, the registrant can either (i) show that it has not provided false or inaccurate contact information or (ii) provide the updated Whois information, then the registrant will be allowed to maintain its usTLD domain name registration. If, however, after thirty (30) days, the registrant either does not respond to the registrar's notice or is unable to provide true and accurate contact information, the registrant shall be deemed to have breached its registration agreement and the registrar shall be required to delete the registration. The registrar shall not be required to refund any fees paid by the registrant if the registrar terminates a registrant's registration agreement due to its enforcement of this provision.

Reserved Names Policy

Consistent with existing policies and subject to approval by the DOC, NeuStar, as the usTLD Administrator proposes to reserve from registration by the general public certain second level domain names. The reservation of such names will be made to prevent their improper use in the marketplace and/or to permit the usTLD Administrator to introduce important new services and enhancements to the usTLD. Moreover, responsible management of some of the listed names will maximize utility of these second level domains and can uniquely serve the public interest if administered by a responsible party.

The draft list that follows is intended to be illustrative rather than definitive. NeuStar will work collaboratively with DOC and the Council to finalize a list that will responsibly preserve second level names in order to: prevent confusion; serve a public need; prevent theft of phone numbers, social security numbers and zip codes, and/or represent possible future enhancement

Terms and Conditions: By signing the reverse side of this form, you hereby authorize us to transfer the registration of your domain name(s) from your current registrar to VeriSign, renew your domain name registration(s) for a period of one year from the current record expires date, and change your credit card for this order. You agree to be bound by the terms of the VeriSign Change of Registrar Agreement, which is located at http://www.netsol.com/en_US/legal/change-registrar-agreement.jhtml, and the VeriSign Service Agreement, which is located at http://www.netsol.com/en_US/legal/static-service-agreement.jhtml, both of which form a part of the terms and conditions of this offer. You acknowledge and agree that our ability to transfer and renew your domain name(s) is subject to, among the other conditions set forth in the above-referenced agreements, your current registrar permitting the transfer to VeriSign. You acknowledge and agree that unless and until your domain name(s) is/are transferred to VeriSign's registrar, VeriSign will not be providing you with domain name registration services for the domain name(s) listed on the front of this form and you will continue to work with and pay your current registrar for such services.

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IMPORTANT NOTICE

We understand that your domain name **prolonghealth.com** expires on June 11, 2002. We recommend you renew your domain name at least 30 days prior to its expiration to avoid any "Registrar Lock". Should your current registrar lock your domain name you will be unable to renew your domain name at what are likely to be the new lower prices offered by our firm. Renew today to avoid being forced to pay higher prices. Failure to renew your Domain name by the expiration date may result in a loss of your online identity, which may make it difficult for your customers and friends to locate you on the Web. Should you lose your domain name it may be impossible for you to get it back.

Deregulation of Domain name registration now allows the consumer the choice of their registrar. This allows you to register or renew your domain name at a lower price than most other Registrars.

Domain name holders are not obligated to renew their domain name with their current Registrar (eg. Network Solutions) or with the Domain Registry of America. Review our prices and decide for yourself. You are under no obligation to pay the amounts stated below, unless you accept this offer. We are hoping you will choose the Domain Registry of America. This notice is not a bill, rather an easy means of payment should you decide to register or renew your domain(s) with us.

Renewal	Your Existing Domain	Period Covered	Price
1 year	prolonghealth.com	Jun 11, 2002 – Jun 11, 2003	\$25.00
2 Year (Recommended)		Jun 11, 2002 – Jun 11, 2004	\$40.00
5 year (Best Value)		Jun 11, 2002 – Jun 11, 2007	\$85.00

The following names are currently available for you to register and secure, protecting your domain name from being duplicated.

Other Available Domains	Period Covered	Price
prolonghealth.net	1 Year	\$25.00
	2 Year	\$40.00
prolonghealth.org	1 Year	\$25.00
	2 Year	\$40.00
prolonghealth.biz	2 Year	\$40.00
prolonghealth.info	2 Year	\$40.00

Registration of the above domain names includes DNS, URL and Email Forwarding to your original website and mailbox.

Renew your domain name instantly online at www.droamerica.com 24 hours a day, 7 days a week, or call Customer service at (866) 434-0212 to renew your domain name today.

Please detach this stub and include it with your payment.

Check the appropriate boxes of the Domain names you would like to order.

See reverse for payment address:



AUTO-3-DIGIT 334
NELLY PALAGE
73 CAMELIA CIR
TEQUESTA, FL 33469-2010



Current Domain name (must be renewed)

prolonghealth.com

- 1 Year \$25.00
- 2 Year \$40.00
- 5 Year \$85.00

Total \$ _____

Available Domain names (optional)

- prolonghealth.net
- 1 Year \$25.00
- 2 Year \$40.00
- prolonghealth.org
- 1 Year \$25.00
- 2 Year \$40.00
- prolonghealth.biz
- 2 Year \$40.00
- prolonghealth.info
- 2 Year \$40.00

T348 P1

Please print your domain name on your check. If paying by credit card, please enter your information below.

Card Number: _____

Expiry: _____ / _____

You must provide a valid email address to complete your renewal

Signature _____



ATTACHMENT #13

Registrar Email Verifying Whois Data

Michael D. Palage

From: VeriSign Inc. [migration@verisign.com]
Sent: Friday, April 19, 2002 10:04 AM
To: michael@PALAGE.COM
Subject: Important Information for Michael D. Palage



In our continuing effort to provide better products and service to our customers, we will be upgrading our data systems. These improvements will make managing your domain name registration(s) easier. You will now have password-protected access to your account status and online renewal options all in Account Manager at http://netsol.com/en_US/manage-it/.

In order for us to provide you access to your domain name registrations after the upgrade, we will be sending you new account access information. To ensure you receive this important information in a timely manner, please take a moment to make sure your contact information is current.

Your current Administrative Contact data is as follows:

- Michael Palage
- 73 Camelia Circle
- Tequesta, FL 33469
- US
- (561) 744-6453
- michael@PALAGE.COM

Your current Registrant data is as follows:

- Michael D. Palage
- 73 Camelia Circle
- Tequesta, FL 33469
- US

The domains scheduled for this phase of the upgrade are listed below.

If your information is correct, do nothing.

Please update this information by May 1, 2002 by following these instructions:

1. If you wish to make a change to any information click here www.verisignforms.info.
2. Enter e-mail address and domain name and click proceed.

ADDITIONAL IMPORTANT INFORMATION

If your domain registration(s) are about to expire please renew now at www.netsol.com/en_US/manage-it/bulk-renewal.html otherwise we will be unable to upgrade you.

During this upgrade process you will:

1. Receive an e-mail with instructions for managing your account and your account number. Your password will be sent to you via US postal mail at the address listed above.
2. Be able to change your domain name servers at any time.

If you have any questions please visit our FAQ page at http://www.netsol.com/en_US/promotions/offers/acct-migration-faq.html or e-mail us at migration@verisign.com.

Thank you for your business. We are committed to bringing you the best possible products and services to make your online business a successful one.

Your domain name registrations are:

PALAGE.COM

Mr. COBLE. I commend you gentlemen for complying with the 5-minute rule. You done good, as we say in the rural south. But we apply the 5-minute rule to ourselves as well. If we were not able to exhaust our questioning the first round, there will be a second round of questioning.

Mr. Palage, you represent the registrar community. Can you explain why the Subcommittee received such a poor response to our inquiry? I think we sent out 50 and received about a dozen in response. In your view, does that indicate an unwillingness for them to change their practices or to work with the Government?

Mr. PALAGE. I don't think it indicates an unwillingness. I think it is outreach. The registrars met in Dulles, Virginia, in February; and we asked—this particular question was asked to those that attended. There were about 48 registrars that attended. It is important, when understanding the registrar constituent, there are approximately 150 registrars, only about 40 of them actively participate within the registrar constituency. So unless I had a list of what registrars you sent that out to, it is possible that they do not actively participate within ICANN. It is voluntary.

So if Chris or any of the other Committee Members would provide me this list, I would be able to engage in meaningful outreach within the constituency.

Mr. COBLE. I see no violation of my privacy problem there. I don't think they would object to our doing that, because you are a team member. I think that might be a good idea.

Mr. Beales and Mr. Metalitz—Mr. Beales, you touched on this. To emphasize it, I want to revisit it. One question always arises when discussing the Whois database and that is this: privacy. Is there a conflict, in your opinion, between maintaining Internet privacy for consumers and an accurate and reliable Whois database?

Mr. BEALES. Well, I think there is certainly a tension with respect to Web sites that are registered by individuals such as those under the dot name top-level domain. On the one hand, they have an interest in legitimate privacy concerns. On the other hand, we

don't want to let fraudsters hide behind that simply by asserting that they are individual or noncommercial Web sites.

I think what is probably most important is to distinguish between general access and law enforcement access, that law enforcement has a legitimate need to look behind some of the—some people who might appear and may have a legitimate privacy interest to see whether that is real or whether it is a “dot con” that is hiding.

Mr. COBLE. Mr. Metalitz.

Mr. METALITZ. I think Mr. Beale's characterization as tension rather than conflict is one that I would agree with. I think the solution that he proposes or that he talks about in his testimony may not be realistic. It is very hard to draw a clear line between an individual and noncommercial domain name that is one that is being used for commercial purposes.

Individuals do commit cybersquatting. Individuals do commit copyright piracy. Or someone claiming to be an individual, some entity claiming to be an individual can register a domain name for many purposes. So it is very difficult to know when a domain name registrant steps over the line and, if you will, forfeits any right to privacy that they might have.

I think a more realistic solution is to recognize that there are many, many ways for individuals to have a very robust presence online without registering a domain name. But if they choose to register a domain name they should know that the information they provide has to be accurate, they have to be accountable, and it should be available to the public.

I also would question the distinction between law enforcement access and general access. Copyright owners think that we are enforcing legal rights as well when we obtain access to Whois data on sites that are committing copyright piracy. At least in the U.S. We don't expect the Federal Government and the taxpayers to incur that expense for us of enforcing our rights.

Mr. COBLE. Mr. Palage, you want to weigh in on this? I put the question to the other two gentlemen. Do you all have any comment to add?

Mr. POWELL. I think there is a resolvable tension between privacy and access. One of those is that free access can continue to be available on a particular registrar's Web site one domain name at a time.

The real problem with privacy is when a registrar is forced to give bulk access, all 1 million, all 5 million of its domain names to any comer, anybody who is willing to pay them \$10,000, anybody who might be engaging in telemarketing or spamming with that information.

So I think what you need is to give bulk access primarily or maybe only to entities who are restricted from using it for marketing purposes and the only purpose would be to build—to aggregate all 100 registrars' active registration data. These entities would parse each field so that you can do a search by domain name, or by the name of a cybersquatter, and find out everything that persons owns, even by a fax number, or come up with a list of every domain that falls into that category across all registrars.

That would cost some money to put together. There would be a search cost associated with that, just as there is now by Thomson & Thomson and NetBenefit and a few other entities who do provide searchable Whois databases on a smaller scale.

Mr. COBLE. My time has expired. Mr. Palage, I will give you a bite at that on the second round.

The gentleman from California, Mr. Berman.

Mr. PALAGE. Within the registrar constituency—

Mr. COBLE. I will come back to you on my second round. Thank you.

Mr. Berman.

Mr. BERMAN. Thank you, Mr. Chairman.

By and large, for the person who chooses to get a domain name and have a Web site, what is so different about that person than the person who wants to open a brick and mortar business and by city law is required to get a permit with accurate information? I mean, I am trying to understand the privacy—the legitimate privacy interest of that individual that would justify the total failure of the registrars to get serious about complying with what I understand to be their obligations and their agreements that got them accredited; and I am trying to better understand what ICANN is doing to actually enforce this.

Maybe I will just start with Mr. Palage. You essentially state that registrars shouldn't be obligated to prescreen contact data. You state this isn't technically or economically feasible. I don't understand why you say that.

Mr. PALAGE. Could I give you specific examples?

Mr. BERMAN. Let me finish. I mean, I have a funny feeling that the registrars verify the credit card number of the registrants when they pay. I mean, you do the things necessary to make sure that you are getting the money when you agree to register the domain name. Why can't you check the name on the card as well? Why can't you check whether fields have been filled in or whether zip codes are valid numbers?

They do that now at gas stations when I give my credit card. Verisign is providing more elaborate check services to eBay. SnapNames may be able to provide such services as well.

I am not saying that 100 percent accuracy is that achievable at a relatively inexpensive cost, but it wouldn't be hard to weed out a lot of blank entries or entirely false entries, and I am just wondering why these checks are really beyond the ability of the registrar. I am wondering if the failure of a lot of these registrars to comply is about maximizing their revenue and—or perhaps I am just an old man who doesn't understand. I am not with it in terms of some deep metaphysical feeling that there is something wrong with undertaking this obligation that is contrary to Internet philosophy.

Mr. PALAGE. I think it is a combination of a lot of different factors. There are some registrars that do employ checks. They will not accept no fields, blank fields during submission process. There are some registrars that, if the data fields are less than three characters, they will run a check. So there is some meaning—there are some registrars within the constituency that have voluntarily employed these prescreenings.

Mr. BERMAN. Why couldn't all registrars do that?

Mr. PALAGE. One of the things that we are trying to do right now within the constituency is to come up with a code of conduct or a best practice standards to move forward. One of the problems that we have in initiating this document are the current restraints within ICANN regarding consensus policy and bringing consensus to a code of conduct within the registrar constituency.

We meaningfully tried to engage in this approximately a year ago, and after about 6 to 8 months it unfortunately stalled.

One of the reasons I think that a meaningful reform of ICANN is needed is that it will provide a mechanism for new initiatives such as the accuracy of data to move forward in a less political environment and achieve results in a more timely fashion.

I would like to address some of your other concerns because I don't think they are valid concerns.

Regarding credit card verification, there are some registrars that I know that do use credit card processing to verify. Some of the limitations, however, deal with credit card verifications with European addresses. Within the U.S., it appears to be very accurate. I am heard positive things with some registrars that have employed this to cut down on fraud. Because if they don't get paid, it is a business decision. They are not out there just providing a forum for bad people to register domain names anonymously.

Another problem in the domain name industry is that there are a lot of different business models, and there are some registrars that actually provide reseller services for their channel partners. So sometimes the registrar does not have the actual registrant's credit card data. It may be through a third party. For example, Yahoo is not an accredited registrar, but if you go to Yahoo dot com you can register domain names. So there are a lot of different business channels.

Some of the things the constituency is trying to come up with is what is reasonable and what can be done to minimize, you know, the accuracy problems.

One of the concerns—and Mr. Metalitz and I agree on a lot of things. One of the only things where we did sort of disagree on is the screening upfront of data. I think the more important mechanism has to be on the back end. When data is found to be inaccurate, it needs to be tracked, docketed so that there could be, shall we say, a log of what conduct is going on. So that, in the example of the OECD case where the person just changed one field and then was required to change another field, to identify that contact and bring an end to it.

Dealing with at least one specific example of people providing false information upfront to get through filters, in the Affiliate Sunrise Challenge with the World Intellectual Property Organization we actually had one individual that literally stole the identity of a trademark owner. He had the business address, all the trademark data, and he purported himself to be the trademark owner before an administrative proceeding before the WIPO and actually prevailed. It wasn't until the trademark owner found out that someone had misappropriated his identity that we were able to correct the action.

Again, the nefarious element out there on the Internet, they will find everything they can to circumvent mechanisms put in place. That is why I think we need to look at meaningful enforcement and cancellation of domain names on the back end.

So I hope I tried to answer your questions.

Mr. BERMAN. My time has expired.

Mr. COBLE. As I said, we will have a second round.

Mr. Palage, I want to give you a chance to weigh in on the privacy question, but before I forget it, when I indicated that the staff would share the responses with you, what I indicated was I wanted to be sure it was proper. I want people who do respond to our inquiries to feel secure that we as a Subcommittee are not going to willy-nilly disseminate their names and responses. But in this case, since you represent them, I think there is nothing at all improper about that. And I would like to know why we didn't get more responses.

But on the privacy question, Mr. Palage.

Mr. PALAGE. Turning to the privacy question, one of the unique aspects, one of the things that I have appreciated working within the ICANN structure is that there is a global perspective on issues. There are—actually, I have seen one or two European registrars in this room today; and one of the things that the European registrars always try to enforce is the European directive on privacy.

It is a concern, however, based upon the current contracts with ICANN as they are stated, that data need to be made available. It needs to be open and available for all third parties. I think it is important to look for mechanisms in the future to possibly qualify or restrict access to data, but until those mechanisms can be properly vetted and explored, I think it is critical for law enforcement and intellectual property owners to have open and full access to the data.

Mr. COBLE. Thank you, sir.

Mr. Powell, this was touched on, but I want to again—for emphasis, I want to give you a shot at it. In your opinion, what would constitute a model Whois policy for registrars to maintain, A, and should Congress be the source of issuing such a model policy?

Mr. POWELL. That is a very good question. Taking the last part first, I am not sure I yet have an opinion of all the consequences of who issues the policy or where the mandate comes from. Certainly, even if Congress were to act, if it were to impose by statute a policy, then arguably that policy could only really be enforced against U.S.-based registrars. If the policy comes from ICANN, whether it is of ICANN's own volition or whether Congress encourages the policy, then there is something that is enforceable against all ICANN-accredited registrars, regardless of where they may live.

Mr. COBLE. Mr. Metalitz, you want to insert your oars into these waters?

Mr. METALITZ. Just briefly. I think Mr. Powell is right. ICANN is the logical party to do this. They have reserved to themselves their agreements, the authority to do it. They can require the registrars to live up to it. They can discredit registrars who don't live up to it.

If ICANN won't do it, I think you have to look at legislation and other options, but I think ICANN is the logical party to take this step.

Mr. COBLE. Do you want to comment as to what would constitute the policy. You want to get into that or not?

Mr. POWELL. Yes, I would. As I suggested in some of my recommendations, I think there are actually existing requirements that if enforced would get us a long way toward where we want to go. The problem, though, is that ICANN really doesn't have the budget to sue everyone who doesn't comply. By my count, perhaps three quarters of the 100 registrars have Whois policies that are at odds with what ICANN's agreements allow them to have. Very expensive. I would, I think, eliminate the idea of bulk Whois access. I think the law of intended consequences comes into play. Not only is bulk Whois access abused for the most part and not used as it was intended by third parties to provide a value added searchable database, but it actually gives registrars incentives to keep as much good data out of the bulk Whois that they might be handing to their competitors.

So they do things like they automatically opt out customers by default, even though the agreements with ICANN say that only the registrant can choose to opt out. So that what happens is the registrar then gives maybe one fifth of its total data in the bulk Whois format. So there are a lot of unintended consequences of that requirement.

Mr. COBLE. You all can think about that and let us know in writing if you would like to do that. We have a vote on now, but I want to recognize the gentleman from California for the second round.

Mr. BERMAN. I would like Mr. Beales just to sum up what you think—you made reference to this in your testimony, but I want to make sure I understand it, but just sum what you think the FTC or ICANN or the Congress should be doing to reach the—I mean you seem to be coming from the same place I am on a lot of these issues, and therefore I am curious on how you think we can make it make happen.

Mr. BEALES. I think ICANN is the logical place to try to make it happen.

Mr. BERMAN. We talked about ICANN for a year-and-a-half. I have a feeling there are people around here who have been talking about it longer than that. They don't seem to be serious about this up until now.

Mr. BEALES. There are discussions going on about the structure of ICANN that may be part of the problem here. And reform of ICANN itself may be a first step toward addressing problems with the Whois database. I think what is important to us is we don't want to see—the reason ICANN is important because it is an international body and an international standard, and we don't want to see standards that are different in the United States because we are concerned that it will simply push fraudsters abroad where it is even harder for us to get accurate information and to find out what is going on. So it may not be the perfect institution, but it is the only institution that can address the problem uniformly and across borders at the moment.

Mr. BERMAN. Well, Mr. Chairman, there is a lot in the testimony here, I think, to work with and, because of the votes, I think we can pursue this in a nonhearing mechanism, but I do want to thank you again for holding the hearing and yield back.

Mr. COBLE. Howard, if you have another question or two, we probably have time.

Mr. BERMAN. No. I think I am finished.

Mr. COBLE. I agree with the gentleman from California. I think it has been a good hearing and gentlemen and particularly—well, strike that. Not necessarily particularly, but my question regarding what would constitute the policy and who would disseminate it or who would issue it, I would like to hear from you about that. I thank you for your testimony, the Subcommittee appreciates your contribution. This concludes the oversight hearing on the accuracy and the integrity of the Whois database. The record will remain open for 1 week for you all to respond in any way you see fit. Thank you for your attendance as well as the people in the audience, and the Subcommittee stands adjourned.

[Whereupon, at 11:05 a.m., the Subcommittee was adjourned.]

A P P E N D I X

STATEMENTS SUBMITTED FOR THE HEARING RECORD

PREPARED STATEMENT OF THE HONORABLE HOWARD L. BERMAN, A REPRESENTATIVE
IN CONGRESS FROM THE STATE OF CALIFORNIA

Mr. Chairman,

I thank you for calling this hearing on the accuracy of the Whois database. This issue has been a priority for this Subcommittee over the last year, and I am pleased to advance the discussion of the Whois database through today's hearing. I look forward to the testimony of today's witnesses.

The internet is invaluable as a tool for communication, commerce, and information transfer. At the same time, however, it has proven invaluable as a tool for fraud, pornography, and piracy. These crimes are exacerbated by fraudulent contact information in a domain name registration—without accurate information, it is difficult for law enforcement officials to trace the perpetrator of a crime, and it is difficult for a consumer to make an informed decision about the integrity of a particular web site.

In several recent fraud investigations performed by the Federal Trade Commission, the Commission uncovered false registration information while investigating other cybercrimes. For instance, the FTC recently won a judgment against a domain name owner who operated an illegal web-based billing scam. That particular owner had registered his domain name with the address of "here there, California". The FTC has also found clearly false entries while sampling the Whois database, such as domain names registered to "mickey mouse" and "god". Some copyright owners estimate that 30% of web sites that sell pirated content are hosted on domain names with obviously false Whois information.

Clearly, there is a problem with this database. One counter-argument that is commonly made when discussing this issue is that of anonymity—that domain name registrants may lie because they wish to protect their privacy. However, I do not believe that accurate, valid Whois information conflicts with anonymity on the internet. I can understand that many people are concerned about protecting their privacy online, particularly if they choose to use the internet as a platform political or controversial speech. But there are ample opportunities for anonymity on the internet. Most ISPs provide a user with the opportunity to publish a web page at little or no cost using the ISP servers. A user can obtain an anonymous third-level domain name through some host companies. Anonymous email can be sent through re-mailers, and there are anonymous chat rooms and anonymous FTP servers. Privacy technologies exist to allow anonymous web surfing. A person who requires anonymity does not also require his own personal domain name to post whatever it is he wishes to say. Indeed, anonymity has no place in dot-com or dot-biz domain names, which are centered on commercial activity.

We can consider the analogy in the brick-and-mortar world. If a consumer has a question about a brick-and-mortar store, he can search publicly accessible records to determine who owns that store. That information is based upon the legal records, and the consumer can feel confident in the accuracy of the information. The same opportunity, and the same confidence, should exist for consumers in the online world.

Online, registrars and other entities already appear to be taking steps toward information verification, and I applaud these efforts. For instance, registrants to the dot-pro domain are required to be certified professionals, and RegistryPro will only register a domain name if it can first verify the certification information provided by the registrant. Additionally, eBay recently announced that it will use VeriSign to authenticate the addresses and telephone numbers of auction sellers by cross-checking with the U.S. Postal Service and phone records. I believe this type of ver-

ification must be done for domain name registrations, to ensure that internet web-surfers and consumers can have a positive online experience.

Several weeks ago, Mr. Coble and I introduced legislation to create criminal penalties for deliberately providing false information when registering an internet domain name. I hope that this legislation is a first step towards an improved, accurate Whois. I also hope that additional steps toward the goal of accurate Whois will be inspired by our discussion today.

MATERIAL SUBMITTED FOR THE HEARING RECORD

LETTER FROM BENJAMIN EDELMAN, THE BERKMAN CENTER FOR INTERNET & SOCIETY
AT HARVARD LAW SCHOOL



THE BERKMAN CENTER FOR INTERNET & SOCIETY
A T HARVARD LAW SCHOOL

May 20, 2002

The Honorable Howard Coble
Chairman
Subcommittee on Courts, the Internet, and Intellectual Property
Committee on the Judiciary
U.S. House of Representatives
Room 2125, Rayburn House Office Building
Washington, DC 20515-6115

Dear Chairman Coble:

It is my honor to provide the Committee with a copy of my recent publication, "Large-Scale Intentional Invalid WHOIS Data: A Case Study of 'NicGed Productions' / 'Domains For Sale,'" for your consideration in the context of the Committee's upcoming hearing on the accuracy and integrity of the WHOIS database.

I have attached a copy of my report as well as a sample of its lengthy appendix. The full appendix is available on the report's web site, at
<<http://cyber.law.harvard.edu/people/edelman/invalid-whois/>>.

Please don't hesitate to contact me if I can be of assistance in any way.

Sincerely,

Benjamin Edelman

Large-Scale Intentional Invalid WHOIS Data: A Case Study of "NicGod Productions" / "Domains For Sale"

[[Overview](#) - ["Domains For Sale"](#) - [Types of WHOIS Errors](#) - [Specific Domains](#) - [Summary Statistics](#) - [Conclusions](#) - [Policy Implications](#) - [Motivation](#)]

Overview

In recent years, many Internet users have become aware that domain name registrants do not always offer accurate contact information. The distributed "WHOIS" database storing and distributing this contact data is generally thought to be important for correcting technical errata, resolving disputes over domain name allocation, and holding web site operators responsible for the content they distribute. A series of [contracts](#), from ICANN to registrars to registrants, requires that contact data be complete and accurate, but nonetheless certain registrants fail to properly provide the required contact information.

While many WHOIS errors likely result from accidental error in data entry or data processing, certain registrants have been found to intentionally provide systematically inaccurate contact information to registrars for inclusion in the WHOIS database. Such fraud can include the entry of invalid street addresses and phone numbers, i.e. contact information that in fact reaches no one, or it can instead offer as the purported registrant of a domain some third party in fact wholly unrelated to the domain.

In recent research, I have [documented 1278 domains reregistered by one particular firm](#) known for its widespread use of invalid WHOIS contact information. The majority of these domains redirect users to a single web page displaying a list of links to content that is, by and large, unrelated; the remaining domain names provide access to sexually-explicit images. While this research is by no means exhaustive -- other firms likely follow similar registration practices, and still others make numerous invalid registrations and reregistrations that no doubt differ in various ways -- a review of these specific registrations as well as their general characteristics may be helpful in understanding the behavior at issue.

Note that this research is focused specifically on large-scale domain registrations. I do not address the questions of privacy, spam, and consumer protection raised by publication of individual registration data in the WHOIS database.

A Case Study: "Domains For Sale" Reregistrations by an Undetermined Registrant

Recent testing reflects that a firm calling itself "NicGod Productions" and "Domains For Sale" (henceforth, "NicGod") operates some 900+ domain names that by and large redirect to a page that offers a list of links unrelated to the requested domain. A subset of NicGod's domains offer sexually-explicit images on a paid subscription basis.

NicGod's 1278 domains include a wide variety of character strings. The vast majority of domain names explicitly suggest specific content other than what is present on the

subsequent list of links -- for example, angry-kids.com, californiastateuniversity.com, doctorjohn.com, polygram-us.com, reform-party-usa.org, and winthrop-police.com.

It seems that most or all of NicGod's domains were previously held by other registrants. According to archive.org, at least 843 (66%) of NicGod's domains previously offered HTML titles suggesting the availability of other content, precisely indicating that the domains were previously put to another use before registration by NicGod. Some 133 (10%) of NicGod's domains continue to be listed in Yahoo, in categories reflecting the prior availability of content other than the current NicGod listing of links. Similarly, some 1019 (80%) of NicGod's domains are mentioned on one or more other pages, as reported by Google; these many outside references further suggest that the NicGod domains previously hosted other content. In this regard, NicGod's registration practices seem to be similar to those documented by this author in his April 2002 [Domains Reregistered for Distribution of Unrelated Content: A Case Study of "Tina's Free Live Webcam"](#).

A review of the current registrants of domains previously held by NicGod suggests that certain registrants, among them the major American firms of Hewlett-Packard and AOL, are coming to hold certain domains held by NicGod as recently as March of 2002. These firms may be purchasing the domains at issue from NicGod or may be using a UDRP or similar challenge to obtain the domains.

Update: This author attempted to contact NicGod at one of the phone numbers provided in WHOIS contact records. In a return call of four days later, the author learned that a randomly-selected NicGod-registered domain was available for \$1200 (asking price) and could be transferred within 24 hours. The NicGod representative suggested payment via an escrow company, Paypal, or Afternic, noting that Afternic would charge a \$100+ fee that he thought to be excessive. The NicGod representative responded to complaints about the proposed fee by reporting the randomly-selected domain's popularity in search engines Lycos, Hotbot, and Altavista and further noting that the domain received, in his experience, 200 or more "type-in" requests per day. When asked about the minimum price he had ever accepted for a domain name ("to avoid a loss" as he put it), the representative said \$550 was his minimum, and when asked about his identity, he said he had "no secrets" and that his name was in fact Allen Ginsberg, notwithstanding that this is also (but, he seemed to suggest, only coincidentally) the name of a famous poet. The NicGod representative spoke fluent English in a heavy accent that this author found consistent with the hypothesis of Eastern European national origin. Caller ID was blocked on his incoming call. (May 15, 2002)

WHOIS Errors and "Tricks": NicGod's Methods for Keeping Its Identity Secret

A review of NicGod registration practices shows a variety of techniques that seem to be used to keep secret the identity, location, and contact information of the NicGod staff.

The NicGod domains are notable for their wide variety of registration methods and purported contact locations. NicGod's domains use a total of eleven distinct registrars;

leading registrars are Dotster (377 domains), Bulkregister (343), The Registry at Info Avenue (282), Namescout (113), enom (71), and iHoldings / dotRegistrar (62). Furthermore, NicGod provides at least nine distinct countries for registration of its various domain names, including Armenia, Bulgaria, Canada, Estonia, Germany, Hong Kong, the Netherlands, Russia, and the United States. A series of investigations has shown various of these addresses to be invalid. ([International Herald Tribune](#))

In addition to using a large number of invalid addresses for the registration of its domains, in many instances NicGod seems to enter the names of one or more well-known individuals as the purported registrant of its domains. For example, some 425 NicGod domains purport to be registered by [Allen Ginsberg](#), also the name of a deceased American poet. For other domain registrations, NicGod uses a variety of company names -- including "Domain ForSale," "Grafikal Kompilations," "Triple Zero Networks," and "Merkus, Matching." An [OECD report](#) further alleges that in some instances NicGod uses or previously used as the registrant name for one domain the prior registrant's name from another domain -- causing substantial confusion as to who is responsible for NicGod's registrations.

Many of the domains registered by NicGod offer a telephone and fax contact in the United States. The specified phone number is a voice mail box in the 309 area code assigned to Bloomington, Illinois. [Documentation gathered by the OECD](#) suggests that NicGod may purchase this service from an Illinois voice mail firm; in this case, NicGod itself may nonetheless have no actual presence in Illinois.

[Data collected by Patrick Jones of UDRPlaw.net](#) suggests that NicGod has faced at least 27 challenges under the [Uniform Domain-Name Dispute Resolution Policy \(UDRP\)](#) but has in every instance failed to respond to complaints. It is possible that staff of NicGod would prefer to forfeit their domains under the UDRP, rather than reveal their identity by responding to a UDRP complaint; alternatively, staff of NicGod may not receive UDRP complaints precisely as a result of the invalid contact data provided by NicGod to its registrars.

Of course, even NicGod's methods may ultimately prove inadequate for keeping secret its identity. Most or all NicGod domains are hosted at [dslextrreme.com](#), an ISP in Canoga Park, California; it is possible that this firm knows the true identity and location of NicGod, information that it might have obtained in the course of billing or customer support. Alternatively, any of NicGod's registrars might know the firm's identity location from similar interactions. It is possible that any or all of these firms might disclose known information on the basis of a subpoena or other request.

Specific Domain Registrations with Invalid Contact Data

In recent testing and archiving, I have prepared a listing of a total of 1278 distinct domains that are (or recently were) registered to (or by) NicGod, and that likely offer (or recently offered) invalid contact data.

For each domain, I have attempted to obtain a variety of information including:

- Current title of default web page (as of May 2002)
- Date of domain registration by current registrant, when available from registrar; name of current registrar
- Prior page title, when available from archive.org (as of approximately January 1, 2000)
- Prior META DESCRIPTION and KEYWORDS tags, when available from archive.org (as of approximately January 1, 2000)
- Current Yahoo category, when available from Yahoo (as of May 2002)
- Other pages referencing or linking to domain, when available from Google (with counts as of May 2002)
- The number of times the domain's default web page was accessed by Alexa users between December 2001 and May 2002, with rank data when available
- The domain's registrant and administrative contact of record (as of May 2002)
- Access to page archives, when available from archive.org

The results of this data collection effort are freely and publicly available. Due to the large size of the listing of results, the listing is provided in sections by first letter of domain name:

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z numbers

Summary Statistics

Of the 1278 distinct domains registered to NicGod, 1112 currently point to listings of links with pop-up advertising and possible click-through sponsorship. Of the remaining 166 domains, at least some have been transferred to other registrants (among them AOL and HP), and at least 32 offer sexually-explicit images.

According to current testing in Google, 1019 of NicGod's domains (80%) are mentioned in one or more web pages (as via a link or a textual reference to the domain name).

Yahoo continues to classify 133 of NicGod's domains (10%) into its hierarchical directory categories. In a casual inspection, none of these categories seems to properly characterize the content available from NicGod.

Archive.org reports that at least 843 (66%) of NicGod's domains previously contained a title suggesting the availability of other content.

NicGod uses at least eleven different registrars (primarily Dotster, Bulkregister, and Namescout) and uses multiple registration addresses in at least nine distinct countries. Contact information in some registrations invokes the names of well-known individuals who are deceased as well as unaffiliated with NicGod.

Of NicGod's domains, [Alexa](#) toolbar logs reflect that the most popular were ITLIBRARY.COM (previously a resource about information technology) and ASCGAMES.COM (a computer game developer site). In the past six months, these sites received 131788 and 59361 accesses, respectively, from users of the Alexa toolbar -- making them, at least among Alexa users, the 3161th and 6877th most popular sites on the web. A total of 75 of NicGod's domains received more than 100 requests from Alexa users in the past six months -- suggesting that many of NicGod's domains were and remain relatively popular.

Possible Conclusions

While the data linked above is but a single case study of what is known to be a more widespread phenomenon, it is nonetheless possible to draw certain conclusions on the basis of work completed to date. Possible conclusions include the following:

- There exist substantial numbers of registrations with intentionally-invalid WHOIS contact information, and at least some registrants take significant deliberate steps to obfuscate their true identities and locations.
- Of registrants providing intentionally-invalid WHOIS contact information, at least some register and hold large number of domains.
- The problems with DNS are interrelated in the sense that those who register large numbers of domains with invalid WHOIS contact information may also engage in other activities of concern. For example, registrants offering invalid WHOIS contact information may tend to be the same registrants who reregister large numbers of domains for the distribution of unrelated and/or sexually-explicit materials, or who offer sexually-explicit material on domain names that do not immediately suggest the availability of such materials.
- Links and other online references continue to point to domain names even many months after those domains have come to host content inconsistent with the suggestion of the linking or referencing pages. This phenomenon holds both for relatively small linking entities (i.e. ordinary web pages) as well as large firms (such as Yahoo).
- The domains registered by NicGod are not "forgotten" or "unimportant." Indeed, many of these domains receive or previously received many thousands, if not millions, of accesses per year.

Future Work, Discussion, and Policy Implications

This work has focused on only several hundred registrations by a particular single firm. While that firm is in some circles notorious for the invalid data it enters into the WHOIS database, it would be desirable to collect additional data so as to better understand the scope of the problem. Unfortunately, large-scale analysis is difficult because it is in many instances time-consuming, difficult, and costly to determine whether or not a given contact is in fact invalid. Future work will seek to develop additional automated methods for verifying telephone numbers, for cross-checking telephone numbers with street addresses, and for otherwise recognizing suspect trends in WHOIS data. To this end, the

author welcomes submission of additional examples of domains with intentionally-invalid contact information; send such submissions to the author.

While a full policy analysis is beyond the scope of the current project, available data suggests that existing work by registrars and ICANN has been unsuccessful in assuring the accuracy of WHOIS data. Instead, systematic errors have remained over time, and known-abusers have continued to register at least hundreds of domains without providing valid contact information.

In this context, ICANN's recent Registrar Advisory Concerning Whois Data Accuracy seems arguably too limited to fully and efficiently address the entire problem at hand. Instead, when a given domain is found to contain invalid contact information, and when this contact information is found to be intentionally invalid, a registrar might consider canceling *all* of that registrant's domains rather than only a particular single domain. (To reduce the risk of error, the registrar would of course first use all available methods to attempt to contact the registrant. Furthermore, the domains at issue would initially be placed into some sort of "hold" status wherein they do not function on the Internet yet, for a limited time, can be returned only to the prior registrant but not to any other interested party.)

John Berryhill points out that improvements in the accuracy of the WHOIS database may have a dual effect -- first, as expected, to increase the ability of interested parties to learn the identity of the registrant of a given domain; second, to use that registrant's contact information to induce the registrant to transfer the domain to some other registrar or to otherwise defraud the registrant. (More information about domain name scams from the FTC.)

Some registrants may prefer to keep their contact information confidential. ICANN's Registrar Accreditation Agreement anticipates this possibility and therefore allows registrars to hold registrants' valid contact information in trust, while publishing in WHOIS only a placeholder address. Certain third-party firms provide a similar service. Note, however, that these intermediary services are separate and distinct from the large-scale intentional entry of invalid contact information that is the subject of this document's discussion and of which NicGod is an example.

Motivation

The purpose of this work is primarily academic -- to document the activity at issue for the benefit of those who seek to make policy decisions on related matters. In the context of ICANN's recent Registrar Advisory Concerning Whois Data Accuracy as well as associated Congressional hearings, the availability of this data and analysis is intended to be helpful to policy-makers and other interested parties.

This page is made available to inform discussion about the registration of Internet domain names. The data contained here is not intended for use for other purposes, and it should not be used for other purposes without first contacting the author.

In order to confirm the results of my testing and to attempt to obtain certain other information, I sent an email inquiry to various of the contacts listed in WHOIS records of domains registered by NicGod. I have to date received no reply to the questions posed. Comments from NicGod staff remain welcome, as are comments from others interested; with the permission of the author, comments may be posted or linked from this page as appropriate.

Ben Edelman

Last Updated: May 16, 2002 - [Notify me of major updates and additions to this page.](#)

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Large-Scale Intentional Invalid WHOIS Data

A Case Study of 'NicGod Productions' / 'Domains For Sale'

[[A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#) [Q](#) [R](#) [S](#) [T](#) [U](#) [V](#) [W](#) [X](#) [Y](#) [Z](#) numbers]

The domains listed below were all found in testing of April-May 2002 to NicGod Productions. For each domain, the listing provides a variety of supplemental information including:

- Current title of default web page (as of April 17, 2002)
- Date of domain registration by current registrant, when available from registrar; name of registrar
- Prior page title, when available from archive.org (as of approximately January 1, 2000)
- Prior META DESCRIPTION and KEYWORDS tags, when available from archive.org (as of approximately January 1, 2000)
- Current Yahoo category, when available from Yahoo (as of May 11, 2002)
- Other pages referencing or linking to domain, when available from Google (with counts as of May 11, 2002)
- The number of times the page was accessed by Alexa users between December 2001 and May 2002, with rank data when available
- The domain's registrant and administrative contact of record (as of May 11, 2002)
- Access to page archives, when available from archive.org

For details, see [data analysis and discussion](#).

A2J.NET

Current title: A2J.NET - Welcome!

Registered on: Nov 19, 2001 *by registrar:* DOTSTER, INC.

Old title: This Page Has Moved

Google: [Pages containing a2j.net](#) (83), [linking to a2j.net](#)

Alexa Access Count: 13 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (3 distinct snapshots among 20 archives since Dec 6, 1998)

Domain Registrant: Domains For Sale SP/Vaastriku 9/1052/Tallinn, Estonia 19312/Estonia

Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP/Vaastriku 9/1052/Tallinn, Estonia 19312/Estonia/+1.309.296.9505/-1.309.296.9505

AARDVARK-MASTERING.COM

Current title: AARDVARK-MASTERING.COM - Welcome!

Registered on: Oct 31, 2001 *by registrar:* BULKREGISTER.COM, INC.

Old title: Aardvark Record Mastering - Mastering of vinyl records

Google: [Pages containing aardvark-mastering.com](#) (13), [linking to aardvark-mastering.com](#)

Old description: Mastering of phonograph records, reasonably priced fast turnaround.

Old keywords: acetate, acetates, lacquer, lacquers, analog, phonograph, phono, mastering, dubs, dub, master, aardvark, record, records, vinyl, locked, lock, groove, grooves, lock groove, westrex, cutterhead

Alexa Access Count: 2 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (11 distinct snapshots among 59 archives since Nov 11, 1998)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE <A // Vardanants St., # 32/Yarvan, AM 375010/AM
Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale/Zhealdyabova 1262/Kiev, - 03057/UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact:Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 1262/Kiev, - 03057/UA//Phone: (380 44) 436 24 29 //Fax:

ABAAD.COM

Current title: ABAAD.COM - Welcome!

Old title: а̀а̀а̀а̀ ã̀ë̀ú̀ç̀ı̀

Google: [Pages containing abaad.com](#) (9), [linking to abaad.com](#)

Old keywords:

Arab,Arabic,Arabian,Islam,Islamic,Muslim,news,travel,business,Computer,Magazine,Education,Reference,prayer,Press,Sports,Medical, ÙÑÈ, ÙÑÈi, ÙÑÈiÉ, Çá ÙÑÈiÉ, ÁÓáÇã, Á ÓáÇãiÉ, Çá Á ÓáÇãiÉ, ÇÓáÇã, ÁÏÈÇÑ, ÇÏÈÇÑ, Çá ÙÑÈi, ÁÐÈÕÇÏ, ÑiÇiÖÈ, ÓiÇiÉ, ÈÑÝiÉ, Ò È, ÈÐÇÝÉ, Çá ÙÇÈ, æßÇáÉ, æßÇáÇÈ, ã

Alexa Access Count: 224 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (1 distinct snapshot among 12 archives since Nov 28, 1999)

Domain Registrant: Triple Zero Networks/Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE

Domain Admin Contact: Ginsberg, Allen support@micgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@micgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505

ABERDEENS.D.COM

Current title:

Registered on: Oct 4, 2001 *by registrar:* DOTSTER, INC.

Old title: Aberdeen Area Chamber of Commerce

Google: [Pages containing aberdeensd.com](#), [linking to aberdeensd.com](#)

Alexa Access Count: 8 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (4 distinct snapshots among 21 archives since Dec 1, 1998)

Domain Registrant: Aberdeen Area Chamber of Commerce/516 S. Main Street/Aberdeen, SD 57401//US

Domain Admin Contact: Ogdahl, Gail gail@aberdeens-chamber.com//Aberdeen Area Chamber of Commerce/516 S. Main Street/Aberdeen, SD 57401//US//605) 225-2860//605) 225-2437

ABLOOK.COM

Current title: Welcome to: ABLOOK.COM!

Registered on: Nov 13, 2001 *by registrar:* DOTSTER, INC.

Google: [Pages containing ablook.com](#) (71), [linking to ablook.com](#)

Alexa Access Count: 73 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (6 distinct snapshots among 43 archives since Dec 21, 1997)

Domain Registrant: Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia

Domain Admin Contact: Ginsberg, Allen support@micgod.com//Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//+1.309.296.9505//+1.309.296.9505

ABRITUS-INT.COM

Current title: Welcome to: ABRITUS-INT.COM!

Registered on: Jan 1, 2002 *by registrar:* BULKREGISTER.COM, INC.

Old title: Abritus International -- Office databases and integrated business software

Google: [Pages containing abritus-int.com](#) (26), [linking to abritus-int.com](#)

Old description: Business software from Abritus International. Save time and resources,

Alexa Access Count: 18 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (10 distinct snapshots among 27 archives since Apr 15, 2000)

Domain Registrant: domains.micgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM
Domain Admin Contact: Host Master micgod@micgod.com//Domam For Sale//Zhealdyabova 1262//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@micgod.com//NicGod//Zhealdyabova 1262//Kiev, - 03057//UA//Phone: (-380 44) 436 24 29 //Fax:

ABSOLUTE PERFECT.COM

Current title: Absolute Perfect Free Sex - ABSOLUTE PERFECT

Registered on: Nov 28, 2001 *by registrar:* ENOM, INC.

Google: [Pages containing absoluteperfect.com](#), [linking to absoluteperfect.com](#)

Alexa Access Count: 21 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: Grafikal Kompilations//The Hostmaster (gkhost@yahoo.com)//+359 (2) 406-954//FAX- +359 (2) 406-954//c/o GK PO

Old keywords: accountancyage.com, accountancy-age.com, accountancy industry, accountancyage.co.uk, accountancy age, accountancyweb, accounting reviews, financial news, business news, business magazine, accountancy news, tax news, accounting age, online magazine, accou ...

Alexa Access Count: 42 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (2 distinct snapshots among 12 archives since Apr 10, 2000)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (380 44) 436 24 29 //Fax:

ACCP-VWC.ORG

Current title: ACCP-VWC.ORG - Welcome!

Old title: 1997 Virtual World Congress

Google: [Pages containing accp-vwc.org \(18\), linking to accp-vwc.org](#)

Archive: [index, as of ~1/1/2000](#) (5 distinct snapshots among 18 archives since Apr 3, 1997)

Domain Registrant: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505

ACCURESUME.COM

Current title: ACCURESUME.COM - Welcome!

Old title: AccuResume Home Page

Google: [Pages containing accuresume.com \(36\), linking to accuresume.com](#)

Old description: AccuResume is a comprehensive and customizable software system for recruiting and database management of resumes.

Old keywords: AccuResume, Resume, Recruiting, Software, Database Management, HTML Resume, ASCII Resume, Resume Database Management, Online Recruiting, Resume Creation, Software

Alexa Access Count: 8 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (4 distinct snapshots among 42 archives since Dec 21, 1997)

Domain Registrant: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505

ACTIONMICRO.COM

Current title: ACTIONMICRO.COM - Welcome!

Google: [Pages containing actionmicro.com, linking to actionmicro.com](#)

Alexa Access Count: 8 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (1 distinct snapshot among 4 archives since Mar 1, 2001)

Domain Registrant: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505

ADDRESS2.COM

Current title: ADDRESS2.COM - Welcome!

Registered on: Dec 11, 2001 *by registrar:* DOTSTER, INC.

Google: [Pages containing address2.com \(56\), linking to address2.com](#)

Alexa Access Count: 10 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (2 distinct snapshots among 4 archives since Apr 21, 2001)
 Domain Registrant: Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia
 Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//+1.309.296.9505//+1.309.296.9505

ADENGINE.NET

Current title: **ADENGINE.NET**
 Registered on: Dec 27, 2001 by registrar: BULKREGISTER.COM, INC.
 Google: [Pages containing adengine.net](#), [linking to adengine.net](#)
 Alexa Access Count: 3 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)
 Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM
 Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 1262//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 1262//Kiev, - 03057//UA//Phone: (380 44) 436 24 29 //Fax:

ADSERVER.ORG

Current title: ADSERVER.ORG - Welcome!
 Registered on: Dec 11, 2001 by registrar: DOTSTER, INC.
 Google: [Pages containing adserver.org](#), [linking to adserver.org](#)
 Alexa Access Count: 4 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)
 Domain Registrant: Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia
 Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//+1.309.296.9505//+1.309.296.9505

ADVERGO.COM

Current title: Welcome to: ADVERGO.COM!
 Registered on: Aug 30, 2001 by registrar: ENOM, INC.
 Old title: ADVANCED ERGONOMICS - Ergonomic Consulting and Training
 Google: [Pages containing advergo.com](#) (26), [linking to advergo.com](#)
 Old description: Description
 Old keywords: ergonomic office ergonomics training pre-employment testing employment screening human factors back injuries industrial safety program consultant consultants consulting worker's compensation carpal tunnel syndrome cumulative trauma disorders ctd resource ...

Alexa Access Count: 8 requests by Alexa users over past six months
 Archive: [index, as of ~1/1/2000](#) (6 distinct snapshots among 21 archives since Dec 2, 1998)
 Domain Registrant: Triple Zero Networks//Allen Ginsberg (support@nicgod.com)//1.309.296.9505//FAX- 1.309.296.9505//Vastriku 9/1052//Tallinn Estonia, 19312//EE
 Domain Admin Contact: Triple Zero Networks//Allen Ginsberg (support@nicgod.com)//1.309.296.9505//FAX- 1.309.296.9505//Vastriku 9/1052//Tallinn Estonia, 19312//EE

AEROPLANES.ORG

Current title: AEROPLANES.ORG - Welcome!
 Registered on: Dec 19, 2001 by registrar: BULKREGISTER.COM, INC.
 Google: [Pages containing aeroplanes.org](#), [linking to aeroplanes.org](#)
 Archive: [index, as of ~1/1/2000](#) (2 distinct snapshots among 3 archives since May 18, 2001)
 Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM
 Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 1262//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 1262//Kiev, - 03057//UA//Phone: (-380 44) 436 24 29 //Fax:

AETON.COM

Current title: Welcome to: AETON.COM!

Registered on: Dec 16, 2001 *by registrar:* BULKREGISTER.COM, INC.

Old title: Home Page

Google: [Pages containing aeton.com \(29\)](#), [linking to aeton.com](#)

Alexa Access Count: 28 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (6 distinct snapshots among 21 archives since Nov 11, 1998)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A /7 Vardanants St., # 32/Yerevan, AM 375010/AM
Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale//Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: (-380 44) 436 24 29 //Fax:

AFEE.ORG

Current title: AFEE.ORG - Welcome!

Registered on: Jan 21, 2002 *by registrar:* BULKREGISTER.COM, INC.

Old title: Association Française de l'Édition Multimédia

Google: [Pages containing afee.org \(58\)](#), [linking to afee.org](#)

Alexa Access Count: 19 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (5 distinct snapshots among 34 archives since Dec 29, 1996)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A /7 Vardanants St., # 32/Yerevan, AM 375010/AM
Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale//Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: (-380 44) 436 24 29 //Fax:

AFFILIATE-CHANNEL.COM

Current title:

Registered on: Feb 24, 2002 *by registrar:* BULKREGISTER.COM, INC.

Old title: Affiliate Channel -- Clients

Google: [Pages containing affiliate-channel.com \(37\)](#), [linking to affiliate-channel.com](#)

Alexa Access Count: 21 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (3 distinct snapshots among 20 archives since Jul 7, 2000)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE: -ENTRER IIRI: -/A /7 Vardanants St., # 32/Yerevan, AM 375010/AM
Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale//Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: (-380 44) 436 24 29 //Fax:

AFNLAW.COM

Current title: AFNLAW.COM - Welcome!

Old title: Asset Forfeiture Network

Google: [Pages containing afnlaw.com \(13\)](#), [linking to afnlaw.com](#)

Archive: [index, as of ~1/1/2000](#) (11 distinct snapshots among 55 archives since Dec 27, 1996)

Domain Registrant: Triple Zero Networks/Vastriku 9/1052/Tallinn Estonia, Estonia 19312/EE
Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// 11.309.296.9505 (FAX) 11.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// 11.309.296.9505 (FAX) 11.309.296.9505

AFRICAWEST.NET

Current title: AFRICAWEST.NET - Welcome!

Old title: AFRICA WEST

Google: [Pages containing africawest.net \(51\)](#), [linking to africawest.net](#)

Yahoo: Regional > Countries > Togo > Business and Economy

Old description: freight airline company, compagnie aeriennne de fret

Old keywords: fr

Alexa Access Count: 15 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (10 distinct snapshots among 48 archives since Dec 3, 1998)
 Domain Registrar: Triple Zero Networks//Vastriku 9/1052//Tallim Estonia, Estonia 19312//EE
 Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallim Estonia, Estonia 19312 EE// 1.309.296.9505 (FAX) 1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallim Estonia, Estonia 19312 EE// 1.309.296.9505 (FAX) 1.309.296.9505

AGING-WORLD.COM

Current title: Welcome to: AGING-WORLD.COM!

Old title: International Year of the Older Person

Google: [Pages containing aging-world.com](#) (183), [linking to aging-world.com](#)

Old description: Aging-World.Com celebrates innovations in aging and provides a mechanism for collaboration by professionals in the aging field during the 1999 observance of the International Year of Older Persons.

Old keywords: aging, International Year of Older Persons, elderly, senior citizen, aged, NCOA, United Nations, IYOP, geriatrics

Alexa Access Count: 2 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (4 distinct snapshots among 25 archives since Oct 9, 1999)

AGIS-USA.ORG

Current title: AGIS-USA.ORG - Welcome!

Registered on: Dec 17, 2001 by registrar: BULKREGISTER.COM, INC.

Old title: The Alliance for Global Internet Services

Google: [Pages containing agis-usa.org](#) (36), [linking to agis-usa.org](#)

Old description: The Alliance for Global Internet Services (AGIS) provides research, training, and consulting

Alexa Access Count: 6 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (2 distinct snapshots among 30 archives since Dec 6, 1998)

Domain Registrar: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A #7 Vardanants St., # 32/Yerevan, AM 375010//AM
 Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale//Zhealdybova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdybova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

AGNFILES.COM

Current title:

Registered on: Sep 18, 2001 by registrar: IHOLDINGS.COM, INC. D/B/A

Google: [Pages containing agnfiles.com](#) (122), [linking to agnfiles.com](#)

Alexa Access Count: 1 request by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (1 distinct snapshot among 9 archives since Dec 6, 1998)

Domain Registrar: Allen Ginsberg (AGNFIL-ES-COM-DOM)/bdomains.nicgod.com Domain For Sale /A#//19, Bondarenko square//Obninsk, Kaluga 249020//Russia//1.309.296.9505//1.309.296.9505//dotregister@nicgod.com
 Domain Admin Contact: Allen Ginsberg dotregister@nicgod.com//19, Bondarenko square//Obninsk, Kaluga 249020//Russia//1.309.296.9505//Fax- 1.309.296.9505

AH-GALLERY.COM

Current title: AH-GALLERY.COM - Welcome!

Registered on: Nov 13, 2001 by registrar: BULKREGISTER.COM, INC.

Old title: 02»Ö»ÄË

Google: [Pages containing ah-gallery.com](#) (13), [linking to ah-gallery.com](#)

Alexa Access Count: 51 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (6 distinct snapshots among 20 archives since Mar 3, 2000)

Domain Registrar: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A #7 Vardanants St., # 32/Yerevan, AM 375010//AM
 Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale//Zhealdybova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-

9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

AIBA-NOTICIAS.COM

Current title: AIBA-NOTICIAS.COM - Welcome!

Old title: Index of /

Google: [Pages containing aiba-noticias.com \(17\), linking to aiba-noticias.com](#)

Alexa Access Count: 12 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (7 distinct snapshots among 30 archives since May 2, 1998)

Domain Registrant: Triple Zero Networks//Vastrika 9/1052//Tallinn Estonia, Estonia 19312//EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastrika 9/1052// Tallinn Estonia, Estonia 19312 EE// -1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastrika 9/1052// Tallinn Estonia, Estonia 19312 EE// -1.309.296.9505 (FAX) +1.309.296.9505

AIHEU.ORG

Current title: AIHEU.ORG - Welcome!

Registered on: Jan 12, 2002 *by registrar:* BULKREGISTER.COM, INC.

Old title: Cougar Hill Sanctuary Association

Google: [Pages containing aiheu.org \(86\), linking to aiheu.org](#)

Alexa Access Count: 13 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (13 distinct snapshots among 30 archives since Oct 14, 1999)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A //7 Vardanants St., # 32//Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

AINFOLINE.COM

Current title: Welcome to: AINFOLINE.COM!

Registered on: Jan 24, 2002 *by registrar:* BULKREGISTER.COM, INC.

Old title: Mingster.com

Google: [Pages containing ainfoline.com, linking to ainfoline.com](#)

Old description: mingster.com

Old keywords: Ming Tsai, home page

Alexa Access Count: 5 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (3 distinct snapshots among 10 archives since Dec 5, 1998)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A //7 Vardanants St., # 32//Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

AKMAKJIAN.NET

Current title:

Google: [Pages containing akmakjian.net, linking to akmakjian.net](#)

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: //temporary info (domainz@mcht.com)//2532144//87 Temporary Adress//Los Angeles, CA 90004//US

Domain Admin Contact: //temporary info (domainz@ncht.com)//2532144//87 Temporary Adress//Los Angeles, CA 90004//US

ALEGRIA.NET

Current title: ALEGRIA.NET - Welcome!

Registered on: Jan 13, 2002 *by registrar:* DOTSTER, INC.

Google: [Pages containing alegria.net, linking to alegria.net](#)

Alexa Access Count: 8 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: Domains For Sale SP/Vastriku 9/1052//Tallinn, Estonia 19312//Estonia
Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP/Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//+1.309.296.9505//+1.309.296.9505

ALEXANDRYA.COM

Current title: ALEXANDRYA.COM - Welcome!

Old title: Alexandrya.com

Google: [Pages containing alexandrya.com \(62\)](#), [linking to alexandrya.com](#)

Alexa Access Count: 6 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (6 distinct snapshots among 20 archives since Jan 25, 1999)

Domain Registrant: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) -1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505

ALGATEHOTEL.COM

Current title: ALGATEHOTEL.COM - Welcome!

Old title: Hotel Algate

Google: [Pages containing algatehotel.com \(14\)](#), [linking to algatehotel.com](#)

Alexa Access Count: 1 request by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (2 distinct snapshots among 16 archives since Oct 10, 1999)

Domain Registrant: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) -1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505

ALGORE-2000.ORG

Current title: ALGORE-2000.ORG - Welcome!

Registered on: Oct 4, 2001 *by registrar:* DOTSTER, INC.

Old title: Welcome to the Gore-LIEberman 2000 unofficial campaign web site

Google: [Pages containing algore-2000.org \(249\)](#), [linking to algore-2000.org](#)

Old description: algore-2000.org and gorelieberman-2000.com are the Unofficial Gore-Lieberman 2000 campaign web sites

Old keywords: al gore, gore, algore, gore2000, al gore campaign, scandal, hypocrisy, corruption, racism, lies, fraud, sex, censorship, bill clinton, hillary clinton, illegal drugs, john mccain, bill bradley, jesse jackson, anti semitism, marijuana, communist, armand ha

...

Alexa Access Count: 4 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (7 distinct snapshots among 19 archives since Nov 27, 1999)

Domain Registrant: Domains For Sale SP/Vastriku 9/1052//Tallinn, Estonia 19312//Estonia

Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP/Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//+1.309.296.9505//+1.309.296.9505

ALIX.NET

Current title: ALIX.NET - Welcome!

Registered on: Dec 11, 2001 *by registrar:* DOTSTER, INC.

Google: [Pages containing alix.net \(6\)](#), [linking to alix.net](#)

Alexa Access Count: 13 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (2 distinct snapshots among 2 archives since Apr 28, 2001)

Domain Registrant: Domains For Sale SP/Vastriku 9/1052//Tallinn, Estonia 19312//Estonia

Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP/Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//+1.309.296.9505//+1.309.296.9505

ALLOS.ORG

Current title: ALLOS.ORG - Welcome!

Registered on: Dec 27, 2001 *by registrar:* NAMESCOUT CORP

Old title: Alliance Operating System Web Site

Google: [Pages containing allos.org](#), [linking to allos.org](#)

Old description: Alliance is a new open-source project setting out to develop an operating system based on the ideas in the Caching Model of Operating System Functionality as developed at Stanford University.

Old keywords: alliance, allos, os, operating, system, systems, open, source, open-source, cache, kernel, gnu, gpl, general, public, license, emulator, emulation

Alexa Access Count: 24 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (10 distinct snapshots among 34 archives since Dec 6, 1998)

Domain Registrar: Domain ForSale//DomainForSale//b//7 Vardanants St., # 32//Yerevan//--//AM//375010//

Domain Admin Contact: Domain ForSale//DomainForSale//President//7 Vardanants St., # 32//Yerevan//--//375010//AM//1.309.296.9505//1.309.296.9505//admin@elazy.net

ALLTHEPLANET.COM

Current title: ALLTHEPLANET.COM - Welcome!

Registered on: Dec 26, 2001 *by registrar:* BULKREGISTER.COM, INC.

Google: [Pages containing alltheplanet.com](#) (289), [linking to alltheplanet.com](#)

Alexa Access Count: 6 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (1 distinct snapshot among 3 archives since Nov 29, 1999)

Domain Registrar: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

ALOHAGAMES.COM

Current title: ALOHAGAMES.COM - Welcome!

Old title: AlohaBowl.net

Google: [Pages containing alohagames.com](#) (36), [linking to alohagames.com](#)

Old description: The Jeep Aloha Bowl site

Alexa Access Count: 10 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (15 distinct snapshots among 34 archives since Mar 27, 1997)

Domain Registrar: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) -1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505

ALPHA-C.NET

Current title: ALPHA-C.NET - Welcome!

Old title: IP TECHNOLOGIES

Google: [Pages containing alpha-c.net](#) (122), [linking to alpha-c.net](#)

Archive: [index, as of ~1/1/2000](#) (7 distinct snapshots among 15 archives since Dec 26, 1996)

Domain Registrar: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505

ALTAVIZSLA.COM

Current title: ALTAVIZSLA.COM - Welcome!

Old title: Altavizsla.com - A virtuális szimat

Google: [Pages containing altavizsla.com \(76\)](#), [linking to altavizsla.com](#)

Alexa Access Count: 67 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (1 distinct snapshot among 32 archives since Jan 25, 1999)

Domain Registrant: Grafikal Komplikations/The Hostmaster (gkhost@yahoo.com)/+359 (2) 406-954/FAX: +359 (2) 406-954/c/o GK PO Box 229 KaimakChalan Street/Sofia, 1505/BG

ALTEZZA.NET

Current title: ALTEZZA.NET - Welcome!

Registered on: Mar 4, 2002 by registrar: BULKREGISTER.COM, INC.

Google: [Pages containing altezza.net \(158\)](#), [linking to altezza.net](#)

Alexa Access Count: 6 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (6 distinct snapshots among 11 archives since May 25, 2000)

Domain Registrant: domans.niegod.com DOMAIN FOR SALE - ENTER HERE -/A // Vardanants St., # 32//Yerevan, AM 375010//AM
Domain Admin Contact: Host Master niegod@niegod.com/Domain For Sale/Zhaldyabova 1262//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@niegod.com//NncGod//Zhaldyabova 1262//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

ALTGIRL.COM

Current title: Alternative Girls - ALTGIRL

Registered on: Dec 27, 2001 by registrar: NAMESCOUT CORP

Google: [Pages containing altegirl.com](#), [linking to altegirl.com](#)

Alexa Access Count: 17 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: Domain ForSale/DomainForSale/b// Vardanants St., # 32//Yerevan//AM//375010//
Domain Admin Contact: Domain ForSale/DomainForSale/President// Vardanants St., # 32//Yerevan//AM//375010//AM//1.309.296.9505//1.309.296.9505/admin@elazy.net

ALTOSNET.COM

Current title: ALTOSNET.COM - Welcome!

Old title: Altos Education Network

Google: [Pages containing altosnet.com \(55\)](#), [linking to altosnet.com](#)

Old description: The Altos Education Network offers business courses and training for managers, professionals and entrepreneurs on the Internet. Students interact directly with the instructor and members of their class group.

Old keywords: education, training, distance learning, online education, learn, entrepreneur, intrapreneur, business, finance, college graduate school, mba, open university, online education, online training, web-based training, web courses, cyber education, cybered, mo

Alexa Access Count: 10 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (17 distinct snapshots among 63 archives since Dec 23, 1996)

Domain Registrant: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE
Domain Admin Contact: Ginsberg, Allen support@niegod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@niegod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// 1.309.296.9505 (FAX) 1.309.296.9505

ALWAYSAPPLE.COM

Current title: ALWAYSAPPLE.COM - Welcome!

Old title: Global Gold UK: Domain Registration and Web Hosting

Google: [Pages containing alwaysapple.com \(23\)](#), [linking to alwaysapple.com](#)

Old description: Global Gold offers low cost internet services from just £6.00. We offer Domain Registration, Web Hosting on UNIX, NT and Macintosh (Mac)

Old keywords: domain,free,domain registration,domain registration,transfers,easy,business, web hosting, unix hosting, crusier, launcher, resellers, reselling, domains, domain names, domain name registration, free domain space, domains, domain registration, uk domains, webs

Alexa Access Count: 3 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (10 distinct snapshots among 16 archives since Dec 11, 1997)

Domain Registrant: Triple Zero Networks/Vastriku 9/1052/Tallinn Estonia, Estonia 19312/EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// -1.309.296.9505 (FAX) -1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) 1.309.296.9505

AMAGA.COM

Current title: AMAGA.COM - Welcome!

Old title: Welcome to Shamrock

Google: [Pages containing amaga.com \(133\)](#), [linking to amaga.com](#)

Old description: Shamrock is a major manufacturer of a wide range of color CRT and LCD monitors. Shamrock produces over 180,000 monitors a month for OEMs, distributors, and sales offices worldwide.

Old keywords: monitors, monitor, LCD, display, displays, Cathode ray tube, Liquid crystal display, screen, USB, Diamondtron, Mitsubishi, Invar mask, Shadow mask, aperture grille, Short length, Short-length, large screen, PC monitors

Alexa Access Count: 2 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (5 distinct snapshots among 19 archives since Dec 3, 1998)

Domain Registrant: Triple Zero Networks/Vastriku 9/1052/Tallinn Estonia, Estonia 19312/EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// -1.309.296.9505 (FAX) 1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) -1.309.296.9505

AMANDAPEET.NET

Current title: Amanda Peet HomePage - AMANDAPEET

Registered on: Mar 3, 2002 *by registrar:* BULKREGISTER.COM, INC.

Google: [Pages containing amandapeet.net \(52\)](#), [linking to amandapeet.net](#)

Alexa Access Count: 21 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32/Yerevan, AM 375010//AM

Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 1262//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 1262//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

AMERICAN-ADOPTION-CONG.ORG

Current title: AMERICAN-ADOPTION-CONG.ORG - Welcome!

Google: [Pages containing american-adoption-cong.org \(29\)](#), [linking to american-adoption-cong.org](#)

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: Triple Zero Networks/Vastriku 9/1052/Tallinn Estonia, Estonia 19312/EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// -1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) -1.309.296.9505

AMERICANBEAUTYMOVIE.COM

Current title: Welcome to: AMERICANBEAUTYMOVIE.COM!

Registered on: Dec 9, 2001 *by registrar:* NAMESCOUT CORP

Old title: AMERICANBEAUTYMOVIE.COM

Google: [Pages containing americanbeautymovie.com \(97\), linking to americanbeautymovie.com](#)

Alexa Access Count: 15 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (2 distinct snapshots among 17 archives since Apr 7, 2000)

Domain Registrant: Domain ForSale/DomainForSale/b//7 Vardanants St., # 32//Yerevan//--//AM//375010//

Domain Admin Contact: Domain ForSale/DomainForSale/President//7 Vardanants St., # 32//Yerevan//--//375010//AM//1.309.296.9505//1.309.296.9505//admin@elazy.net

AMERICANGALLERY.ORG

Current title:

Registered on: Feb 24, 2002 *by registrar:* BULKREGISTER.COM, INC.

Old title: XO(TM) Web Site Hosting

Google: [Pages containing americangallery.org, linking to americangallery.org](#)

Yahoo: Regional > U S States > New York > Cities > New York > Business and Shopping > Shopping and Services > Arts and Crafts > Galleries

Alexa Access Count: 3 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (8 distinct snapshots among 13 archives since Sep 2, 2000)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM

Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

AMERICANWEBADVANTAGE.COM

Current title: Welcome to: AMERICANWEBADVANTAGE.COM!

Registered on: Oct 19, 2001 *by registrar:* BULKREGISTER.COM, INC.

Old title: Welcome To American Web Advantage

Google: [Pages containing americanwebadvantage.com, linking to americanwebadvantage.com](#)

Old description: American Web Advantage Site Design and Hosting Services. Great looking web pages don't have to cost a bundle.

Alexa Access Count: 1 request by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (4 distinct snapshots among 8 archives since Dec 4, 2000)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM

Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

AMERICARJ.COM

Current title: Welcome to: AMERICARJ.COM!

Registered on: Dec 25, 2001 *by registrar:* BULKREGISTER.COM, INC.

Old title: Web Services Ltda/ espaço gratuito / gratis / correio facil / remailer/hospedagem

Google: [Pages containing americarj.com \(25\), linking to americarj.com](#)

Yahoo: Regional > Countries > Brazil > Recreation and Sports > Sports > Soccer > Clubs and Teams > America F C

Alexa Access Count: 11 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (10 distinct snapshots among 25 archives since Jan 21, 1998)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM

Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

AMMAC.ORG

Current title:

Registered on: Nov 19, 2001 *by registrar:* DOTSTER, INC.

Old title: New Page 1

Google: [Pages containing ammac.org \(178\)](#), [linking to ammac.org](#)

Alexa Access Count: 7 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (1 distinct snapshot among 5 archives since Aug 23, 2000)

Domain Registrant: Domains For Sale SP/Vastriku 9/1052/Tallinn, Estonia 19312/Estonia

Domain Admin Contact: Ginsberg, Allen support@nicgod.com/Domains For Sale SP/Vastriku 9/1052/Tallinn, Estonia 19312/Estonia/+1.309.296.9505/-1.309.296.9505

AMRS.ORG

Current title: AMRS.ORG - Welcome!

Registered on: Dec 11, 2001 *by registrar:* DOTSTER, INC.

Old title: AMRS

Google: [Pages containing amrs.org \(42\)](#), [linking to amrs.org](#)

Yahoo: Science > Earth Sciences > Geology and Geophysics > Remote Sensing > Organizations

Alexa Access Count: 44 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (13 distinct snapshots among 44 archives since Dec 1, 1998)

Domain Registrant: Domains For Sale SP/Vastriku 9/1052/Tallinn, Estonia 19312/Estonia

Domain Admin Contact: Ginsberg, Allen support@nicgod.com/Domains For Sale SP/Vastriku 9/1052/Tallinn, Estonia 19312/Estonia/+1.309.296.9505/-1.309.296.9505

ANESTESIA.NET

Current title: ANESTESIA.NET - Welcome!

Registered on: Dec 11, 2001 *by registrar:* DOTSTER, INC.

Google: [Pages containing anestesia.net](#), [linking to anestesia.net](#)

Alexa Access Count: 3 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: Domains For Sale SP/Vastriku 9/1052/Tallinn, Estonia 19312/Estonia

Domain Admin Contact: Ginsberg, Allen support@nicgod.com/Domains For Sale SP/Vastriku 9/1052/Tallinn, Estonia 19312/Estonia/+1.309.296.9505/+1.309.296.9505

ANGELCYNN.ORG

Current title: Angel Cynn Home - ANGELCYNN

Registered on: Mar 2, 2002 *by registrar:* BULKREGISTER.COM, INC.

Google: [Pages containing angelcynn.org \(251\)](#), [linking to angelcynn.org](#)

Yahoo: Regional > Countries > United Kingdom > Arts and Humanities > Humanities > History > By Time Period > Middle Ages > Organizations

Alexa Access Count: 6 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A /7 Vardanants St., # 32/Yerevan, AM 375010/AM

Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale/Zhealdyabova 1262/Kiev, - 03057/UA/Phone: 1 (309) 296-9505 /Fax: 1 (309) 296-9505/Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 1262/Kiev, - 03057/UA/Phone: (+380 44) 436 24 29 /Fax:

ANGRY-KIDS.COM

Current title:

Registered on: Dec 2, 2001 *by registrar:* BULKREGISTER.COM, INC.

Old title: Angry KIDS! - We are MAD!

Google: [Pages containing angry-kids.com \(9\)](#), [linking to angry-kids.com](#)

Alexa Access Count: 19 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (13 distinct snapshots among 14 archives since Nov 10, 2000)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A /? Vardamants St., # 32/Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale/Zhealdyabova 1262//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 1262//Kiev, - 03057//UA//Phone: (380 44) 436 24 29 //Fax:

ANIMALRIGHTS2000.ORG

Current title: ANIMALRIGHTS2000.ORG - Welcome!

Registered on: Feb 28, 2002 *by registrar:* BULKREGISTER.COM, INC.

Old title: Animal Rights 2000 National Conference

Google: [Pages containing animalrights2000.org \(54\), linking to animalrights2000.org](#)

Old description: Information about the Animal Rights 2000 Conference

Old keywords: Animal Rights 2000 National Conference, animal rights

Alexa Access Count: 1 request by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (7 distinct snapshots among 27 archives since Apr 7, 2000)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A /? Vardamants St., # 32/Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale/Zhealdyabova 1262//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 1262//Kiev, - 03057//UA//Phone: (-380 44) 436 24 29 //Fax:

ANIMEPITSTOP.COM

Current title: Welcome to: ANIMEPITSTOP.COM!

Registered on: Aug 6, 2001 *by registrar:* ENOM, INC.

Old title: Anime Pitstop! The First Anime Search Engine

Google: [Pages containing animepitstop.com \(252\), linking to animepitstop.com](#)

Yahoo: Entertainment > Comics and Animation > Animation > Anime > Web Directories

Old description: Anime Pitstop! Your First Anime Search Engine!

Old keywords: Anime, Manga, Hentai, Search Engines, Anime Links, Links, Japanimation, Japanimation

Alexa Access Count: 92 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (28 distinct snapshots among 59 archives since Dec 3, 1998)

Domain Registrant: Grafikal Kompilations//The Hostmaster (gkhost@yahoo.com)//+359 (2) 406-954//FAX: +359 (2) 406-954//c/o GK PO Box 229 KaimakChalan Street//Sofia, 1505//BG
Domain Admin Contact: Grafikal Kompilations//The Hostmaster (gkhost@yahoo.com)//+359 (2) 406-954//FAX: +359 (2) 406-954//c/o GK PO Box 229 KaimakChalan Street//Sofia, 1505//BG

ANNAUNIV.ORG

Current title: ANNAUNIV.ORG - Welcome!

Old title: Anna University

Google: [Pages containing annauniv.org \(133\), linking to annauniv.org](#)

Yahoo: Regional > Countries > India > States and Union Territories > Tamil Nadu > Districts > Chennai District > Cities > Chennai Madras > Education > College and University > Anna University

Alexa Access Count: 61 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (7 distinct snapshots among 50 archives since Jan 10, 1998)

Domain Registrant: Grafikal Kompilations//The Hostmaster (gkhost@yahoo.com)//+359 (2) 406-954//FAX: +359 (2) 406-954//c/o GK PO Box 229 KaimakChalan Street//Sofia, 1505//BG
Domain Admin Contact: Grafikal Kompilations//The Hostmaster (gkhost@yahoo.com)//+359 (2) 406-954//FAX: +359 (2) 406-954//c/o GK PO Box 229 KaimakChalan Street//Sofia, 1505//BG

ANNIE20TH.COM

Current title: Welcome to: ANNIE20TH.COM!

Registered on: Sep 4, 2001 *by registrar:* DOTSTER, INC.

Old title: Annie!

Google: [Pages containing annie20th.com \(50\)](#), [linking to annie20th.com](#)

Alexa Access Count: 34 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (8 distinct snapshots among 41 archives since Jul 7, 1997)

Domain Registrant: Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia

Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//+1.309.296.9505//+1.309.296.9505

ANTARCTICAFLIGHTS.COM

Current title: ANTARCTICAFLIGHTS.COM - Welcome!

Registered on: Mar 4, 2002 *by registrar:* BULKREGISTER.COM, INC.

Google: [Pages containing antarcticaflights.com \(71\)](#), [linking to antarcticaflights.com](#)

Yahoo: Regional > Countries > Australia > States and Territories > Victoria > Cities and Regions > Croydon > Business and Shopping > Shopping and Services > Travel

Alexa Access Count: 10 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM

Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

ANYGIVENSUNDAY-JP.NET

Current title: ANYGIVENSUNDAY-JP.NET - Welcome!

Registered on: Jan 5, 2002 *by registrar:* BULKREGISTER.COM, INC.

Old title: Any Given Sunday

Google: [Pages containing anygivensunday-jp.net \(35\)](#), [linking to anygivensunday-jp.net](#)

Alexa Access Count: 6 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (1 distinct snapshot among 18 archives since May 11, 2000)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM

Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

ANYPLACE.NET

Current title: ANYPLACE.NET - Welcome!

Old title: Internet Space Provider www.anyplace.net CHEAP WEBSITE!

Google: [Pages containing anyplace.net \(140\)](#), [linking to anyplace.net](#)

Archive: [index, as of ~1/1/2000](#) (1 distinct snapshot among 2 archives since Oct 17, 2000)

Domain Registrant: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE -1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505

ANYPOINT.NET

Current title: ANYPOINT.NET - Welcome!

Registered on: Sep 13, 2001 *by registrar:* NAMESCOUT CORP

Old title: Any Point Australia - Home Page

Google: [Pages containing anypoint.net \(69\)](#), [linking to anypoint.net](#)

Old description: Travel and Historical Guide to Australia

Alexa Access Count: 5 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (2 distinct snapshots among 24 archives since Nov 11, 1998)
 Domain Registrant: Domain ForSale//DomainForSale//Vardanants St., # 32//Yerevan//AM//375010//
 Domain Admin Contact: Allen Ginsberg//None//1052 West Alameda Avenue #
 211//Burbank//CA//91504//US//213.401.2100//admin@ecex.net

AONE.NET

Current title: AONE.NET - Welcome!

Registered on: Mar 24, 2002 by registrar: BULKREGISTER.COM, INC.

Google: [Pages containing aone.net](#), [linking to aone.net](#)

Yahoo: Regional > Countries > Australia > States and Territories > Australian Capital Territory > Cities and Regions > Canberra > Community > Organizations > Science // Regional > Countries > Australia > Arts and Humanities > Performing Arts > Storytelling // En

Alexa Access Count: 2 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (2 distinct snapshots among 3 archives since Apr 4, 2001)
 Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -A //7 Vardanants St., # 32//Yerevan, AM 375010//AM
 Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

ARAGUAONLINE.COM

Current title: Welcome to: ARAGUAONLINE.COM!

Registered on: Dec 11, 2001 by registrar: DOTSTER, INC.

Old title: Aragua Online El Primer Directorio de Aragua

Google: [Pages containing araguaonline.com](#) (59), [linking to araguaonline.com](#)

Yahoo: Regional > Countries > Venezuela > States > Aragua

Old description: The gateway to on and off-line industry, commerce and services in the state of Aragua, Venezuela, El Portal de Servicios, Comercio y Industrias del Estado Aragua

Old keywords: Aragua, Venezuela, Maracay, Choroni, Ocumare, omithology, ecotourism

Alexa Access Count: 20 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (22 distinct snapshots among 54 archives since Dec 21, 1996)
 Domain Registrant: Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia
 Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//+1.309.296.9505//+1.309.296.9505

ARK-INC.ORG

Current title:

Registered on: Nov 13, 2001 by registrar: DOTSTER, INC.

Old title: Autism Resource Konnection

Google: [Pages containing ark-inc.org](#) (63), [linking to ark-inc.org](#)

Alexa Access Count: 16 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (5 distinct snapshots among 16 archives since May 11, 2000)
 Domain Registrant: Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia
 Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//+1.309.296.9505//+1.309.296.9505

ARMENAK.COM

Current title: Welcome to: ARMENAK.COM!

Registered on: Dec 14, 2001 by registrar: DOTSTER, INC.

Google: [Pages containing armenak.com](#), [linking to armenak.com](#)

Alexa Access Count: 14 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (1 distinct snapshot among 3 archives since Mar 31, 2001)

Domain Registrant: Domains For Sale SP/Vastriku 9/1052/Tallinn, Estonia 19312/Estonia
Domain Admin Contact: Ginsberg, Allen support@nicgod.com/Domain For Sale SP/Vastriku 9/1052/Tallinn, Estonia 19312/Estonia/+1.309.296.9505/+1.309.296.9505

ARMENIANSCHOOLS.COM

Current title: ARMENIANSCHOOLS.COM - Welcome!

Registered on: Dec 10, 2001 *by registrar:* BULKREGISTER.COM, INC.

Google: [Pages containing armenianschools.com](#), [linking to armenianschools.com](#)

Alexa Access Count: 8 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A /7 Vardanants St., # 32/Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale/Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com/NicGod/Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: (+380 44) 436 24 29 //Fax:

ARMOURARCHIVE.COM

Current title: Welcome to: ARMOURARCHIVE.COM!

Registered on: Oct 25, 2001 *by registrar:* BULKREGISTER.COM, INC.

Old title: The Armour Archive

Google: [Pages containing armourarchive.com](#) (107), [linking to armourarchive.com](#)

Old description: The Armour Archive is a complete reference source for information on recreating medieval armour. Essays, Chat, Message Boards, Auctions, and more, for Armourers and Fighters of any organization.

Alexa Access Count: 23 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (8 distinct snapshots among 36 archives since Nov 11, 1998)

Domain Registrant: NicGod//7 Vardanants St., # 32/Yerevan, AM 375010//AM
Domain Admin Contact: Ugol Hostmaster tech@nicgod.com/NicGod/Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: (1380 44) 436 24 29 //Fax: //Technical Contact://Ugol Hostmaster tech@nicgod.com/NicGod/Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: (+380 44) 436 24 29 //Fax:

ARROW1045.COM

Current title: Welcome to: ARROW1045.COM!

Registered on: Dec 22, 2001 *by registrar:* BULKREGISTER.COM, INC.

Old title: Nashville's "JAMMIN' OLDIES 104.5" Coming Soon

Google: [Pages containing arrow1045.com](#) (12), [linking to arrow1045.com](#)

Alexa Access Count: 16 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (9 distinct snapshots among 20 archives since Mar 27, 1997)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE: - ENTER HERE -/A /7 Vardanants St., # 32/Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale/Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com/NicGod/Zhealdyabova 126/2/Kiev, - 03057/UA//Phone: (1380 44) 436 24 29 //Fax:

ART-BAG.NET

Current title: ART-BAG.NET - Welcome!

Registered on: Dec 10, 2001 *by registrar:* NAMESCOUT CORP

Old title: art-bag.net

Google: [Pages containing art-bag.net](#) (913), [linking to art-bag.net](#)

Alexa Access Count: 18 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (4 distinct snapshots among 37 archives since Jan 14, 1998)

Domain Registrant: Domain ForSale/DomainForSale/b//7 Vardanants St., # 32/Yerevan//1375010//AM//
Domain Admin Contact: Domain ForSale/DomainForSale/President//7 Vardanants St., # 32/Yerevan//1375010//AM//1.309.296.9505//1.309.296.9505//admin@clazy.net

ART-DIARY.COM*Current title:**Registered on:* Feb 12, 2002 *by registrar:* BULKREGISTER.COM, INC.*Old title:* Domain for SALE*Google:* [Pages containing art-diary.com \(26\)](#), [linking to art-diary.com](#)*Alexa Access Count:* 6 requests by Alexa users over past six months*Archive:* [index, as of ~1/1/2000](#) (3 distinct snapshots among 7 archives since Mar 27, 1997)*Domain Registrant:* domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A //7 Vardanants St., # 32/Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (380 44) 436 24 29 //Tax:**ARTE63.COM***Current title:* Welcome to: ARTE63.COM!*Registered on:* May 17, 2001 *by registrar:* ENOM, INC.*Old title:* index*Google:* [Pages containing arte63.com \(40\)](#), [linking to arte63.com](#)*Alexa Access Count:* 4 requests by Alexa users over past six months*Archive:* [index, as of ~1/1/2000](#) (11 distinct snapshots among 15 archives since Nov 28, 1999)*Domain Registrant:* Triple Zero Networks//Allen Ginsberg (support@nicgod.com)//1.309.296.9505//FAX: 1.309.296.9505//Vastriku 9/1052//Tallinn Estonia, 19312//EE
Domain Admin Contact: Triple Zero Networks//Allen Ginsberg (support@nicgod.com)//1.309.296.9505//FAX: 1.309.296.9505//Vastriku 9/1052//Tallinn Estonia, 19312//EE**ARTHRITISNET.COM***Current title:* Welcome to: ARTHRITISNET.COM!*Registered on:* Nov 13, 2001 *by registrar:* DOTSTER, INC.*Old title:* ArthritisWebSite.com - Home*Google:* [Pages containing arthritisnet.com \(87\)](#), [linking to arthritisnet.com](#)*Old description:* A web site dedicated to embracing the Arthritis community by providing a human touch to current news, insightful articles and important facts, as well as providing a much-needed forum for members of the Arthritis community to reach out to one another, inc ...*Old keywords:* arthritis, back pain, osteoporosis, lupus, fibromyalgia, bursitis, tennis elbow, osteoarthritis, rheumatoid arthritis, rhumatoid arthritis, juvenile rheumatoid arthritis, pain management, joint mobility, what is arthritis, non-steroidal anti-inflammatory ...*Alexa Access Count:* 6 requests by Alexa users over past six months*Archive:* [index, as of ~1/1/2000](#) (10 distinct snapshots among 42 archives since Dec 1, 1998)*Domain Registrant:* Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia
Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//1.309.296.9505// 1.309.296.9505**ARTINDEX.ORG***Current title:* ARTINDEX.ORG - Welcome!*Registered on:* Jan 14, 2002 *by registrar:* DOTSTER, INC.*Google:* [Pages containing artindex.org](#), [linking to artindex.org](#)*Alexa Access Count:* 5 requests by Alexa users over past six months*Archive:* [index, as of ~1/1/2000](#) (1 distinct snapshot among 3 archives since May 19, 2001)*Domain Registrant:* Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia
Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia//1.309.296.9505// 1.309.296.9505

ART-OF-GOLD.COM

Current title: ART-OF-GOLD.COM - Welcome!

Google: [Pages containing art-of-gold.com](#) (14), [linking to art-of-gold.com](#)

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: Triple Zero Networks/Vastriku 9/1052/Tallinn Estonia, Estonia 19312/EE
Domain Admin Contact: Ginsberg, Allen support@nicgod.com/ Triple Zero Networks/ Vastriku 9/1052/ Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505// *Technical Contact, Zone Contact://* Ginsberg, Allen support@nicgod.com/ Triple Zero Networks/ Vastriku 9/1052/ Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505

ARTSLINK.ORG

Current title: ARTSLINK.ORG - Welcome!

Registered on: Jan 12, 2002 *by registrar:* BULKREGISTER.COM, INC.

Google: [Pages containing artslink.org](#) (44), [linking to artslink.org](#)

Alexa Access Count: 6 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A //7 Vardanants St., # 32/Yerevan, AM 375010/AM
Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale/Zhealdyabova 126/2/Kiev, - 03057/UA/Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505// *Technical Contact://*Ugol Hostmaster tech@nicgod.com/NicGod/Zhealdyabova 126/2/Kiev, - 03057/UA/Phone: (-380 44) 436 24 29 //Fax:

ASCGAMES.COM

Current title: Welcome to: ASCGAMES.COM!

Registered on: Nov 13, 2001 *by registrar:* ENOM, INC.

Google: [Pages containing ascgames.com](#) (343), [linking to ascgames.com](#)

Yahoo: Business and Economy > Shopping and Services > Computers > Software > Games > Developers and Publishers

Alexa Access Count: 59361 requests by Alexa users over past six months, ranked 6877 among Alexa users

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: Grafikal Kompilations/The Hostmaster (gkhost@yahoo.com)/+359 (2) 406-954/FAX: +359 (2) 406-954/c/o GK PO Box 229 KaimakChalan Street/Sofia, 1505/BG
Domain Admin Contact: Grafikal Kompilations/The Hostmaster (gkhost@yahoo.com)/+359 (2) 406-954/FAX: -359 (2) 406-954/c/o GK PO Box 229 KaimakChalan Street/Sofia, 1505/BG

ASIANCLICK.COM

Current title: ASIANCLICK.COM - Welcome!

Registered on: Jan 14, 2002 *by registrar:* DOTSTER, INC.

Google: [Pages containing asianclick.com](#), [linking to asianclick.com](#)

Alexa Access Count: 4 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: Domains For Sale SP/Vastriku 9/1052/Tallinn, Estonia 19312/Estonia
Domain Admin Contact: Ginsberg, Allen support@nicgod.com/Domains For Sale SP/Vastriku 9/1052/Tallinn, Estonia 19312/Estonia/+1.309.296.9505/+1.309.296.9505

ASLRA.ORG

Current title: ASLRA.ORG - Welcome!

Registered on: Jan 24, 2002 *by registrar:* BULKREGISTER.COM, INC.

Old title: ASLRA: American Short Line and Regional Railroad Association

Google: [Pages containing aslra.org](#) (15), [linking to aslra.org](#)

Alexa Access Count: 11 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (6 distinct snapshots among 38 archives since Mar 27, 1997)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A //7 Vardanants St., # 32/Yerevan, AM 375010/AM
Domain Admin Contact: Host Master nicgod@nicgod.com/Domain For Sale/Zhealdyabova 126/2/Kiev, - 03057/UA/Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505// *Technical Contact://*Ugol Hostmaster tech@nicgod.com/NicGod/Zhealdyabova 126/2/Kiev, - 03057/UA/Phone: (-380 44) 436 24 29 //Fax:

ASTONISHED.ORG

Current title: ASTONISHED.ORG - Welcome!

Registered on: Jan 18, 2002 *by registrar:* BULKREGISTER.COM, INC.

Google: [Pages containing astonished.org](#) (56), [linking to astonished.org](#)

Alexa Access Count: 12 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (5 distinct snapshots among 7 archives since Feb 18, 2001)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A //7 Vardanants St., # 32/Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

ATLANTIS-AD.COM

Current title: Welcome to: ATLANTIS-AD.COM!

Registered on: Dec 27, 2001 *by registrar:* BULKREGISTER.COM, INC.

Old title: ATLANTIS ADVERTISING

Google: [Pages containing atlantis-ad.com](#) (9), [linking to atlantis-ad.com](#)

Yahoo: Business and Economy > Business > Business > Communications and Networking > Internet and World Wide Web > Web Site Designers > By Region > Countries > India

Old description: ATLANTIS ADVERTISING - for 2d and 3d animation, architectural modelling and walk throughs, web hosting and designing, multimedia production and presentation.

Old keywords: ATLANTIS, atlantic, atlantis-ad, 2d, 3d, modelling, animation, architectural, architect, visualization, visualisation, web, hosting, designing, corporate, training, multimedia, communication, production, advertising, video, film, scripting, script, direct

...

Alexa Access Count: 13 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (4 distinct snapshots among 20 archives since Oct 12, 1999)

Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A //7 Vardanants St., # 32/Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod/Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

ATLASMV.COM

Current title: ATLASMV.COM - Welcome!

Registered on: Aug 30, 2001 *by registrar:* NAMESCOUT CORP

Old title: Atlas Motor Vehicle: Vintage, classic, and collectible motorcycles from around the world.

Google: [Pages containing atlasmv.com](#) (44), [linking to atlasmv.com](#)

Yahoo: Regional > U S States > Illinois > Cities > Chicago > Business and Shopping > Shopping and Services > Automotive > Motorcycles

Old description: Motorcycle trading resource. International multi-lingual motorcycle catalog.

Vintage, classic, collectible and exotic motorcycles from private sellers and dealers around the world. All text in eight languages. Shipping and financial services available.

Th ...

Old keywords: motorcycles, vintage, classic, collectible, rare, motorrad, moto, motocicletti, cykle, Indian, Vincent, Harley, Triump, Velocette, Ariel, BMW, Zundapp, Agusta, Bimota, Ducati, Cagiva, collectibles, knapp, scarso, Russian, German, Italian, French, Polish, ...

Alexa Access Count: 19 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (16 distinct snapshots among 70 archives since Oct 29, 1996)

Domain Registrant: Domain ForSale/DomainForSale/b/7 Vardanants St., # 32/Yerevan, -- (AM)/375010//

Domain Admin Contact: Domain ForSale/DomainForSale/President/7 Vardanants St., # 32/Yerevan/--/375010//AM//1.309.296.9505/1.309.296.9505/admin@elazy.net

ATTITUDEFORMEN.COM

Current title: Attitude For Men - ATTITUDEFORMEN

Google: [Pages containing attitudeformen.com, linking to attitudeformen.com](#)

Alexa Access Count: 1 request by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#)

Domain Registrant: Triple Zero Networks/Vastriko 9/1052/Tallinn Estonia, Estonia 19312/EE

Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks/Vastriko 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriko 9/1052// Tallinn Estonia, Estonia 19312 EE// -1.309.296.9505 (FAX) -1.309.296.9505

ATWATER.NET

Current title: ATWATER.NET - Welcome!

Registered on: Nov 13, 2001 *by registrar:* DOTSTER, INC.

Old title: Temporary Page-/home/httpd/html/index.html

Google: [Pages containing atwater.net, linking to atwater.net](#)

Alexa Access Count: 6 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (4 distinct snapshots among 7 archives since Oct 6, 1999)

Domain Registrant: Domains For Sale SP//Vastriko 9/1052//Tallinn, Estonia 19312//Estonia

Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP//Vastriko 9/1052//Tallinn, Estonia 19312//Estonia//+1.309.296.9505//+1.309.296.9505

AUDIOFUSION.COM

Current title: AUDIOFUSION.COM - Welcome!

Registered on: Dec 28, 2001 *by registrar:* NAMESCOUT CORP

Old title: AudioFusion : the virtual studio music

Google: [Pages containing audiofusion.com](#) (34), [linking to audiofusion.com](#)

Old description: AudioFusion, the virtual studio music on Mac

Old keywords: techno, dj, electronic, house, dance, studio, mac, music, trance,

Alexa Access Count: 13 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (6 distinct snapshots among 13 archives since Jan 25, 1999)

Domain Registrant: Domain ForSale/DomainForSale/b/7 Vardanants St., # 32/Yerevan/--/AM//375010//

Domain Admin Contact: Domain ForSale/DomainForSale/President/7 Vardanants St., # 32/Yerevan, -- (AM)/375010//1.309.296.9505/1.309.296.9505/admin@elazy.net

AUSMETAL.NET

Current title:

Registered on: Mar 19, 2002 *by registrar:* DOMAINSITE.COM, INC.

Old title: Venomous Records

Google: [Pages containing ausmetal.net](#) (102), [linking to ausmetal.net](#)

Alexa Access Count: 37 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (14 distinct snapshots among 43 archives since Mar 27, 1997)

Domain Registrant: Domain ForSale admin@elazy.net/DomainForSale/7 Vardanants St., # 32/Yerevan - 375010 AM/1.309.296.9505/1.309.296.9505 fax

AUSSIEDENVER.COM

Current title: Welcome to: AUSSIEDENVER.COM!

Registered on: Dec 17, 2001 *by registrar:* BULKREGISTER.COM, INC.
Old title: Welcome to Australian American Chamber of Commerce
Google: [Pages containing aussiedenver.com](#) (18), [linking to aussiedenver.com](#)
Old description: Colorado Non-Profit corporation for Rocky Mountain Australian Community. Provides business and social liaison for Australian business interests in Rocky Mountains
Old keywords: Australian-American Chamber of Commerce, businesses and people of Australian and Colorado Rocky Mountain Region.
Alexa Access Count: 14 requests by Alexa users over past six months
Archive: [index, as of ~1/1/2000](#) (8 distinct snapshots among 36 archives since Apr 14, 1997)
Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A //7 Vardanauts St., # 32//Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

AUSTEXMUSIC.COM

Current title: AUSTEXMUSIC.COM - Welcome!
Google: [Pages containing austexmusic.com](#) (20), [linking to austexmusic.com](#)
Alexa Access Count: 1 request by Alexa users over past six months
Archive: [index, as of ~1/1/2000](#) (2 distinct snapshots among 4 archives since Jan 25, 1999)
Domain Registrant: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE//
Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) // +1.309.296.9505// Technical Contact, Zone Contact:// Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// +1.309.296.9505 (FAX) // +1.309.296.9505

AUTAN-SORTIR.COM

Current title: Welcome to: AUTAN-SORTIR.COM!
Registered on: Nov 26, 2001 *by registrar:* BULKREGISTER.COM, INC.
Old title: Autan-Sortir Toulouse - Toutes les infos pratiques pour sortir dans la ville rose
Google: [Pages containing autan-sortir.com](#) (84), [linking to autan-sortir.com](#)
Old description: Rubriques cinéma, musique, théâtre avec programmes lieux et horaires - Annonces, rencontres ... Autan-sortir, l'agenda et le guide des sorties Toulousaines.
Old keywords: cinéma, musique, théâtre, annonces, rencontres : toutes les infos pratiques pour sortir à Toulouse
Alexa Access Count: 7 requests by Alexa users over past six months
Archive: [index, as of ~1/1/2000](#) (18 distinct snapshots among 21 archives since Apr 8, 2000)
Domain Registrant: domains.nicgod.com DOMAIN FOR SALE - ENTER HERE -/A //7 Vardanauts St., # 32//Yerevan, AM 375010//AM
Domain Admin Contact: Host Master nicgod@nicgod.com//Domain For Sale//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: 1 (309) 296-9505 //Fax: 1 (309) 296-9505//Technical Contact://Ugol Hostmaster tech@nicgod.com//NicGod//Zhealdyabova 126/2//Kiev, - 03057//UA//Phone: (+380 44) 436 24 29 //Fax:

AUTO-INFO.NET

Current title: AUTO-INFO.NET - Welcome!
Old title: Background Checks - Criminal Records - Credit Reports - Public Records
Google: [Pages containing auto-info.net](#) (32), [linking to auto-info.net](#)
Old description: Background Checks - Public Records - Criminal Record
Old keywords: background checks,records research,public records,public records research,background check,criminal record,criminal background check,background search,court records,felony records,misdemeanor records,credit checks,background information,criminal record se
Archive: [index, as of ~1/1/2000](#) (14 distinct snapshots among 40 archives since Dec 3, 1998)
Domain Registrant: Triple Zero Networks//Vastriku 9/1052//Tallinn Estonia, Estonia 19312//EE//
Domain Admin Contact: Ginsberg, Allen support@nicgod.com// Triple Zero Networks// Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE//

-1.309.296.9505 (FAX) +1.309.296.9505// Technical Contact, Zone Contact// Ginsberg, Allen support@nicgod.com// Triple Zero Networks//
Vastriku 9/1052// Tallinn Estonia, Estonia 19312 EE// -1.309.296.9505 (FAX) +1.309.296.9505

AVANTOS.COM

Current title: Welcome to: AVANTOS.COM!

Registered on: Nov 13, 2001 *by registrar:* DOTSTER, INC.

Old title: avantos.com

Google: [Pages containing avantos.com \(61\)](#), [linking to avantos.com](#)

Alexa Access Count: 12 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (10 distinct snapshots among 16 archives since Oct 29, 1996)

Domain Registrant: Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia 19312//Estonia

Domain Admin Contact: Ginsberg, Allen support@nicgod.com//Domains For Sale SP//Vastriku 9/1052//Tallinn, Estonia
19312//Estonia//+1.309.296.9505// -1.309.296.9505

AVENUE-ENTERTAINMENT.COM

Current title:

Registered on: Aug 6, 2001 *by registrar:* ENOM, INC.

Old title: Avenue Entertainment Group

Google: [Pages containing avenue-entertainment.com \(27\)](#), [linking to avenue-entertainment.com](#)

Alexa Access Count: 7 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (5 distinct snapshots among 35 archives since Dec 3, 1998)

Domain Registrant: Grafikal Kompilations//The Hostmaster (gkhost@yahoo.com)//+359 (2) 406-954//FAX: +359 (2) 406-954//c/o GK PO
Box 229 KaimakChalan Street//Sofia, 1505//BG

Domain Admin Contact: Grafikal Kompilations//The Hostmaster (gkhost@yahoo.com)//+359 (2) 406-954//FAX: +359 (2) 406-954//c/o GK
PO Box 229 KaimakChalan Street//Sofia, 1505//BG

AVIATIONLINKEXCHANGE.COM

Current title: AVIATIONLINKEXCHANGE.COM - Welcome!

Registered on: Dec 27, 2001 *by registrar:* NAMESCOUT CORP

Old title: Aviation Link Exchange - Banner-Link Exchange Services

Google: [Pages containing aviationlinkexchange.com \(20\)](#), [linking to aviationlinkexchange.com](#)

Old description: Aviation Link Exchange - Banner-Link Exchange Services for Aviation Web Sites.

Old keywords: Banners, Link Exchanges, Services, webmail,email,flight crews,pilots, fa's, airlines.html, webmasters, free. web, internet, how to make a website, cgi, tutorial. make money, money, resources, guide, software, java, javascripts, email, domain, banner exch

...

Alexa Access Count: 12 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (1 distinct snapshot among 22 archives since May 10, 2000)

Domain Registrant: Domain ForSale//DomainForSale//b//7 Vardanants St., # 32//Yerevan, -- (AM)//375010//

Domain Admin Contact: Domain ForSale//DomainForSale//President//7 Vardanants St., # 32//Yerevan, -- (AM)//375010//+1.309.296.9505//+1.309.296.9505//admin@elazy.net

AWARDSJUNGLE.COM

Current title: Welcome to: AWARDSJUNGLE.COM!

Registered on: Jan 13, 2002 *by registrar:* NAMESCOUT CORP

Old title: Awards Jungle - The One-Stop Awards Application Site

Google: [Pages containing awardsjungle.com \(41\)](#), [linking to awardsjungle.com](#)

Old description: Users can submit applications to multiple web award sites, saving time and

bandwidth.

Alexa Access Count: 21 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (14 distinct snapshots among 31 archives since Jan 17, 1999)

Domain Registrant: Domain ForSale/DomainForSale/b/7 Vardanants St., # 32/Yerevan, -- (AM)/375010/

Domain Admin Contact: Domain ForSale/DomainForSale/President/7 Vardanants St., # 32/Yerevan/-- /375010/AM/1.309.296.9505/1.309.296.9505/admin@elazy.net

A-WEDDING.COM

Current title: Welcome to: A-WEDDING.COM!

Registered on: Jul 5, 2001 *by registrar:* I HOLDINGS.COM, INC. D/B/A

Old title: Internet Wedding Links Global Search Homepage

Google: [Pages containing a-wedding.com](#) (146), [linking to a-wedding.com](#)

Yahoo: Regional > U S States > Pennsylvania > Cities > Pittsburgh > Business and Shopping > Shopping and Services > Gifts and Occasions > Weddings // Regional > Countries > France > Overseas Departments > Guadeloupe > Islands > St Martin > Business and Shoppin

Old description: We're a sophisticated, wedding-related

Alexa Access Count: 11 requests by Alexa users over past six months

Archive: [index, as of ~1/1/2000](#) (24 distinct snapshots among 35 archives since May 10, 1996)

Domain Registrant: Allen Ginsberg (A-WEDDING-COM-DOM)/bdomains.nicgod.com Domain For Sale /A/b/19, Bondarenko square/Obninsk, Kaluga 249020/Russia/1.309.296.9505/1.309.296.9505/dotregister@nicgod.com

Domain Admin Contact: Allen Ginsberg dotregister@nicgod.com/19, Bondarenko square/Obninsk, Kaluga 249020/Russia/1.309.296.9505/Fax: 1.309.296.9505

99 domains total

[Return to index](#)

