

WHOIS Challenges: A Toolkit for Intellectual Property Professionals

October 15, 2018

**Prepared by the WHOIS/RDS Subcommittee of the
Internet Committee**

WHOIS Challenges: A Toolkit for Intellectual Property Professionals

Statton Hammock, MarkMonitor, San Francisco, California, USA

Bradley Silver, Time Warner, Inc., New York, New York, USA

Todd Williams, Turner Broadcasting System, Inc., Atlanta, Georgia, USA

Internet Committee

Share Your Story

INTA wants to understand how the new policies are affecting INTA members. If you have a story or solution to share please contact us at WHOISchallenges@inta.org.

As a result of measures taken by the Internet Corporation for Assigned Names and Numbers (ICANN) and registrars and registry operators to comply with the General Data Protection Regulation (GDPR) by May 25, 2018, the public WHOIS database has been significantly modified to mask important contact data of the registrant of a domain name. On May 17, ICANN approved a Temporary Specification, which sets the rules for how registry operators and registrars will collect and display registrant data. Under the Temporary Specification, the name, email address, and physical/postal address of the registrant will be hidden from public display, except for the country and region. See <https://www.icann.org/resources/pages/gtld-registration-data-specs-en>.

This toolkit, compiled by the WHOIS/Registrant Directory Services Subcommittee of INTA's Internet Committee, suggests ways to meet intellectual property (IP) enforcement challenges in a landscape where most WHOIS registrant data is redacted.

Below are a number of tips to assist with investigation of IP infringement, identification of the registrant, and enforcement of rights.

INVESTIGATION

1. **Consider using more human resources.** Protecting IP rights online will become a more resource-intensive process without WHOIS data. This means processes to identify registrant contact information will take greater time and involve more human intervention, as investigators will have to manually search websites for contact information. What used to take one or two steps may now require several steps and/or assistance from outside sources. IP rights holders should consider using additional internal and external human resources to carry out enforcement activities.
2. **Explore other data sources.**
 - a. While the name and email address of the domain registrant may be absent from the new WHOIS output, it may be possible to find out more about the source of alleged harm via other means, such as data on any active websites associated with the domain. Searching for this data will be more time consuming, particularly where there is a high volume of domains and websites. To address this issue, some vendors and companies offer tools that crawl the web and scan metadata from websites and other sources to provide information to help link particular activity to responsible parties.

- b. You may also be able to discern additional information from the IP address associated with a particular website in the following ways:
 - i. While the IP address will not provide details of domain registrants, using certain online tools such as those found through websites like <http://cqcouter.com/whois/> and arin.net can tell you more about how the website is connected to the Internet (e.g., the Internet Service Provider (ISP) or hosting provider).
 - ii. The IP address could also provide more detail on the location of the website's host, which may assist when seeking to identify possible fraudulent activity. (For example, if a website is purporting to be providing services from a particular territory, the IP address could reveal that the services are in fact being provided from elsewhere.)
 - iii. If there is a concern that the domain is associated with spam or phishing, using services such as <https://mxttoolbox.com/blacklists.aspx> you may be able to determine whether it is also associated with an IP address that has been blacklisted for similar activities.

See: <https://www.wikihow.com/Find-a-Website%27s-IP-Address> for additional information.

- c. Also, a domain name nameserver can be checked to correlate other possibly related domain names (see, e.g., <http://dailychanges.domaintools.com/>). Once similar names are identified as “sitting on” the same IP or nameservers, those names can be correlated through the “thin data” that will be available in WHOIS after implementation of GDPR (e.g., registrar, state, date of registration). Through these correlation exercises, one may be able to identify if infringing or harmful domains are under common control.
- d. And, finally, there are more “old-fashioned” means of identifying the source of alleged harm. Where the registrant is a corporate entity, the Temporary Specification requires the display of the name of the legal entity, although not its email address or other contact details. Even if the “address” field in WHOIS provides only the state and/or country of the registrant of the domain name, that information may still be useful to direct you to a particular U.S.-based Secretary of State corporate database, or to a particular country's Trademark Office. While most bad actors are presumably savvy enough not to have filed corporate documents with a U.S.-based Secretary of State or applied for a trademark, not all will be.

IDENTIFICATION

1. **Ask for it.** ICANN's Temporary Specification for a GDPR-compliant WHOIS requires registry operators and registrars to grant access to non-public WHOIS information on the basis of legitimate interests pursued by the requesting party, except where such interests are

overridden by the interests or fundamental rights of the data subject. While there is some skepticism about whether a registrar will provide such information for fear of reprisal from a data protection authority, asking for it, particularly in instances where the registrant is blatantly committing harmful illegal activity, and the request is appropriately tailored, may garner results. Failure to do so, if unreasonable, may violate the terms of ICANN's Temporary Specification, which would warrant a complaint to ICANN's compliance department. The process by which a registrar or registry operator receives and responds to such requests has not been standardized, however see [Annex A](#) for a guide for contacting registrars for WHOIS information. In general, in order to substantiate a request based on legitimate interests, the following information should be included:

- a. Full name, address and contact details of the requesting party.
 - b. The basis on which the request is being made--i.e., infringement of a trademark, copyright or other illegal activity.
 - c. The domain or URL where the infringement is occurring.
 - d. The interest of the requesting party--i.e., owner of the trademark/copyright which is being infringed, or authorized representative.
 - e. Statement of reasonable belief that the domain in question is being used to infringe IP rights.
2. **Pursue other legal means to obtain data.** Most jurisdictions permit a plaintiff that does not yet know a defendant's identity to file suit against John Doe and then use the tools of the discovery process to seek the defendant's true name, as well as other details. Without access to registrant contact information, rights holders will turn to a common practice when a registrant is not known—serving subpoenas on registries and registrars that hold that information. Subpoenas provide for the ability to obtain disclosure of more detailed data elements from over a much longer period of time about potentially malicious registrants—so while more expensive and time consuming than the current “self-serve” WHOIS system, more information can be garnered from the process to assist with prosecuting bad actors.
3. **Review WHOIS history.** Much of the discussion has focused on what will happen to the current WHOIS system, but as we know, databases exist of historical WHOIS information maintained by parties which are not in the European Union, and which are not contractually obligated to ICANN. To the extent that such databases exist, this may prove to be a valuable source for enforcement, at least for as long as it is relevant and reasonably timely.

ENFORCEMENT

1. **Engage with other relevant intermediaries.** Registries, hosting providers, and ISPs are in a position to contact the registrant in the event that some abuse has occurred and the registrant is itself a victim of wrongdoing. Maintain good relationships with the compliance department of the largest registries and registrars.
2. **Contact registrants using an anonymized email address or web form.** Under ICANN's Temporary Specification, the public WHOIS must include an anonymized email address or a web form from which messages could be forwarded to the registrant email address. This approach will enable non-accredited users to contact the registrant. However, as many have experienced,

where communication is relayed by the registrar, there is no way for the requesting party to determine whether the email has been received by the registrant unless it receives a response.

3. **Don't forget about the registrar's abuse contact email address and WHOIS accuracy obligations.** Under Section 3.18 of ICANN's Registrar Accreditation Agreement, registrars are required to maintain an abuse contact email address to receive complaints of abuse, and are obliged to take reasonable and prompt steps to investigate and respond appropriately to any reports of abuse, including any illegal activity involving the use of a domain. The abuse contact email address still will be provided in WHOIS search results post-GDPR. Furthermore, under ICANN's Temporary Specification, a smaller subset of WHOIS data will still be made available

(["thin" data as opposed to "thick" data](#)). This includes the name of the registrant organization (if any provided by the registrant), province, and country. To the extent any of this information is obviously inaccurate, it is advisable to report any inaccuracy to the registrar, which is contractually obligated to terminate, lock, or suspend the domain if it does not hear from the registrant to correct the information within 15 days.

Any failure to include an abuse contact email address, or to investigate and respond to reports of abuse, should be reported to ICANN compliance here:

<https://forms.icann.org/en/resources/compliance/complaints/registrars/standards-complaint-form>.

Report inaccurate WHOIS info to ICANN here:

<https://forms.icann.org/en/resources/compliance/complaints/whois/inaccuracy-form>.

4. **File a Uniform Rapid Suspension System (URS)/Uniform Domain Name Dispute Resolution Policy (UDRP) dispute.** Under the Temporary Specification for a GDPR-compliant WHOIS, the dispute resolution mechanisms—the UDRP and the URS—will continue in their current policy requirements. Consequently, when these rights protection mechanisms are triggered, registrars will have to disclose the registrant information to the complaining party just as they do today. This, of course, doesn't resolve the issue of the complainant trying to obtain registrant information in the first instance to prepare and file a UDRP or URS complaint.
5. **Report Issues to WHOISchallenges@inta.org.** INTA encourages its members to share their stories at WHOISchallenges@inta.org and report any problems obtaining a registrant's information from registrars or registries. INTA is collecting this data for informational and advocacy purposes, as well as possible public relations efforts, and will not use members' names nor disclose any personally identifiable information without the permission of members and/or members' clients. INTA wants to understand how the new policies are affecting INTA members.

Reports will be anonymized and data will be used to inform INTA's advocacy positions moving forward. Please note that your responses may appear in a public document even if information is anonymized. If you do not wish to be quoted anonymously, you will have an opportunity to notify INTA through the WHOISchallenges@inta.org email upon submission of your story. In the event that INTA desires to disclose any member's name or personally identifiable information, the member or member's representative will be contacted for their express, written permission for the intended purpose.

As the effects of the implementation of ICANN's new WHOIS policies become clearer, INTA will be updating the toolkit and providing timely advice to help members navigate the new world of a closed WHOIS system.

Annex A

Requesting Access to Redacted WHOIS Contact Data “How To Guide” 18 July 2018

Introduction

This is a simple set of instructions to contact domain name registrants whose WHOIS contact data is redacted due to GDPR (General Data Protection Regulation).

Many brand protection firms send take-down requests for infringing content to Internet Service Providers via terms of service. While this may provide temporary relief, the domain name still exists, and infringing content can resurface through another ISP, leading to a “whack a mole” problem. Because WHOIS contact data has been redacted, it is now much harder to take the additional step of definitively remediating brand in domain issues. This document demonstrates how to request the reveal of redacted registrant data for more effective and complete enforcement of brand in domain infringement or other domain name abuse. Please note that ICANN’s processes are changing, and these processes may be updated in the future.

To investigate crime, cyber security incidents, consumer protection matters or intellectual property issues, you can request redacted registrant contact information by following the steps below:

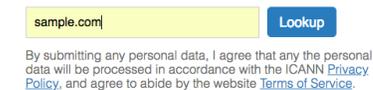
Steps:

In order to request redacted WHOIS contact data to be revealed you must:

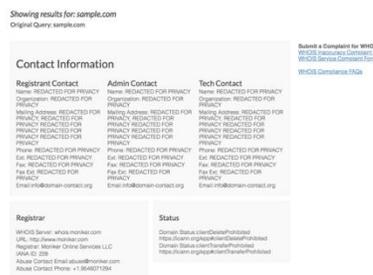
- 1) Find the ICANN-accredited registrar and abuse contact for the domain and registrant.
- 2) Write and submit the request for the redacted contact information
- 3) Track & share results

Step 1 – Using WHOIS to find the registrar

- A) Go to the ICANN [WHOIS](#) Lookup page and request the WHOIS record.



- B) Find the registrar information.



- C) Find the abuse contact for the registrar in the list provided in Appendix A (below) or on the website of the registrar. (At writing all registrars are accepting requests through their abuse contact)

Step 2 – Write and Submit the request for the redacted contact information

- A) Use or modify one of the consumer protection / intellectual property templates in Appendix B or create one of your own.

(note: If you use an agent or representative to issue this type of request to registrars, the registrar may require you to submit a signed authorization on letterhead along with your request as in the case of Tucows)

- B) Submit your request to the registrar abuse contact via the email address you've found in the step above

Step 3 – Sharing Your Results (from [A toolkit for Intellectual Property Owners](#))

- A) Report Issues to WHOISchallenges@inta.org. INTA is collecting this data for informational and advocacy purposes at ICANN, as well as possible public relations efforts, and will not use members' names nor disclose any personally identifiable information without the permission of members and/or members' clients.
- B) You may also submit a report to ICANN compliance if your request is unanswered [here](#).

Appendix A – Registrar Abuse Contacts – Supplied by [AppDetex](#)

Registrar	Email
! #1 Host China, Inc.	abuse@web.com
1 API GmbH	abuse@1api.net
1&1 Internet SE	abuse@1and1.com
101domain GRS Limited	abuse@101domain.com
10dencehispahard, S.L.	abuse@cdmon.com
123-Reg Limited	abuse@domainbox.com
22net, Inc.	abuse@22.cn
AB Name ISP	abuse@nameisp.com
Above.com Pty Ltd.	abuse@above.com
Acens Technologies, S.L.U.	abuse@acens.net
Aerotek Bilisim Sanayi ve Ticaret AS	registrar_abuse@aerotek.com.tr
Alibaba Cloud Computing (Beijing) Co., Ltd.	domainabuse@service.aliyun.com
Alibaba Cloud Computing Ltd. d/b/a HiChina (www.net.cn)	domainabuse@service.aliyun.com
ALIBABA.COM SINGAPORE E-COMMERCE PRIVATE LIMITED	domainabuse@service.aliyun.com
Allworldnames.com LLC	abuse@web.com
AlpNames Limited	abuse@alpnames.com
Amazon Registrar, Inc.	registrar-abuse@amazon.com
Annulet LLC	abuse@annulet.com
APRIL SEA INFORMATION TECHNOLOGY CORPORATION	abuseinquiry@maprilis.net
Arsys Internet, S.L. d/b/a NICLINE.COM	abuse@nicline.com
Ascio Technologies, Inc. Danmark - Filial af Ascio technologies, Inc. USA	abuse@ascio.com
Atak Domain Hosting Internet ve Bilgi Teknolojileri Limited Sirketi d/b/a Atak Teknoloji	abuse@atateknoloji.com
AtlanticFriendNames.com LLC	abuse@web.com
Atomicdomainnames.com LLC	abuse@web.com
Automattic Inc.	domainabuse@automattic.com
BigRock Solutions Limited	abuse-contact@publicdomainregistry.com
Binero AB	abuse@binero.se
Bizcn.com, Inc.	abuse@bizcn.com
Blacknight Internet Solutions Ltd	abuse@blacknight.com
BlastDomains LLC	abuse@namebright.com
Blue Razor Domains, LLC	abuse@bluerazor.com
Brandon Gray Internet Services, Inc. dba NameJuice.com	abuse@namejuice.com
BullRunDomains.com LLC	abuse@web.com
Center of Ukrainian Internet Names	abuse@ukrnames.com
Chengdu West Dimension Digital Technology Co., Ltd.	abuse@west.cn
ChocolateChipDomains, LLC	abuse@web.com
Cool River Names, LLC	abuse@web.com

Corehub, S.R.L.	abuse@corehub.net
CPS-Datensysteme GmbH	en.complaint@cps-datensysteme.de
Crazy Domains FZ - LLC	registry@crazydomains.com
Cronon AG	abuse@strato.de
CSC Corporate Domains, Inc.	domainabuse@cscglobal.com
CSL Computer Service Langenbach GmbH d/b/a joker.com	abuse@joker.com
CV. JOGJACAMP	abuse@resellercamp.com
CV. Rumahweb Indonesia	abuse@rumahweb.co.id
DanCue Inc.	abuse@web.com
DanDomain A/S	abuse@dandomain.dk
DanESCO Trading Ltd.	abuse@danescenames.com
Dattatec.com SRL	abuse@donweb.com
Desert Sand Domains, LLC	abuse@web.com
Deutsche Telekom AG	sece.leitstellenservice@telekom.de
Diamatrix C.C.	abuse@domains.co.za
Dinahosting SL	abuse-domains@dinahosting.com
DNC Holdings, Inc.	abuse@directnic.com
Domain Grabber LLC	abuse@web.com
Domain.com, LLC	compliance@domain-inc.net
Domaincapitan.com LLC	abuse@web.com
Domaincatcher LLC	abuse@web.com
DOMAINCONTEXT, INC.	tld-abuse@domaincontext.com
Domaindrop LLC	abuse@web.com
Domainer Names LLC	abuse@web.com
DomainPeople, Inc.	abuse@domainpeople.com
Domainshype.com, Inc.	abuse-contact@publicdomainregistry.com
Domainyeti.com LLC	abuse@web.com
Domeneshop AS	abuse@domainnameshop.com
DomReg Ltd.	abuse@registrar.libris.com
Dot Holding Inc.	abuse@dotology.com
Dotname Korea Corp	abuse@dotnamekorea.com
Dotservice Inc	abuse@radixregistry.com
DreamHost, LLC	domain-abuse@dreamhost.com
DropCatch.com 1006 LLC	abuse@reg.ru
DropCatch.com 1071 LLC	abuse@namebright.com
DropCatch.com 1123 LLC	abuse@namebright.com
DropCatch.com 1208 LLC	abuse@namebright.com
DropCatch.com 1479 LLC	abuse@namebright.com
DropCatch.com 358 LLC	abuse@namebright.com
DropCatch.com 412 LLC	abuse@namebright.com
DropCatch.com 442 LLC	abuse@namebright.com
DropCatch.com 464 LLC	abuse@namebright.com
DropCatch.com 497 LLC	abuse@namebright.com

DropCatch.com 565 LLC	abuse@namebright.com
DropCatch.com 566 LLC	abuse@namebright.com
DropCatch.com 792 LLC	abuse@namebright.com
DropCatch.com 852 LLC	abuse@namebright.com
DYNADOT, LLC	abuse@dynadot.com
EASYSYSPACE LTD.	abuse@easyspace.com
EndeavourDomains, LLC	abuse@web.com
eNom, Inc.	abuse@enom.com
eNom1033, Inc.	abuse@web.com
eNom1034, Inc.	abuse@web.com
enom393 Incorporated	abuse@web.com
enom399 Incorporated	abuse@web.com
enom409 Incorporated	abuse@web.com
enom411 Incorporated	abuse@web.com
enom415 Incorporated	abuse@web.com
enom419 Incorporated	abuse@web.com
enom421 Incorporated	abuse@web.com
enom425 Incorporated	abuse@web.com
enom429 Incorporated	abuse@web.com
enom433 Incorporated	abuse@web.com
enom435 Incorporated	abuse@web.com
enom437 Incorporated	abuse@web.com
enom441 Incorporated	abuse@web.com
enom455 Incorporated	abuse@web.com
enom459 Incorporated	abuse@web.com
eNom646, Inc.	abuse@web.com
eNom650, Inc.	abuse@web.com
Enomfor Inc	abuse@web.com
EPAG DOMAINSERVICES GmbH	compliance@epag.de
Epik, Inc.	support@epik.com
Eranet International Limited	abuse@eranut.com
Ethos Domains, LLC	abuse@web.com
EuroDNS S.A	legal@eurodns.com
Everyones Internet, Ltd. dba SoftLayer	abuse@softlayer.com
Fabulous.com Pty Ltd.	c.bell@au.darkblueseas.com
FastDomain, Inc.	abuse@fastdomain.com
FBS Inc.	abuse@domaintime.biz
Fine Grain Domains, LLC	abuse@web.com
FREEPARKING DOMAIN REGISTRARS, INC	abuse@freeparking.co.uk
Gabia, Inc.	rrinfo@gabia.com
Gal Communication (CommuniGal) Ltd.	abuse@galcomm.com
Gandi SAS	abuse@support.gandi.net
GKG.Net, Inc.	abuse@gkg.net

GMO Internet, Inc. d/b/a Onamae.com	abuse@gmo.jp
Go Australia Domains, LLC	abuse@godaddy.com
Go Canada Domains, LLC	abuse@godaddy.com
Go China Domains, LLC	abuse@godaddy.com
Go France Domains Inc	abuse@godaddy.com
Go Montenegro Domains, LLC	abuse@godaddy.com
GoDaddy.com, LLC	abuse@godaddy.com
Google Inc.	registrar-abuse@google.com
Gransy s.r.o. d/b/a subreg.cz	abuse@regtons.com
Guangzhou Ming Yang Information Technology co., Ltd	hupo@gz.com
Hetzner Online GmbH	abuse@hetzner.com
Hogan Lovells International LLP	raabuse@hoganlovells.com
Hosting Concepts B.V. d/b/a Openprovider	abuse@registrar.eu
Hosting Ukraine LLC	abuse@ukraine.com.ua
Hostinger, UAB	domains@hostinger.com
ICM Registry LLC	support@icmregistry.com
IHS Telekom, Inc.	abuse@ihs.com.tr
In2Net Network, Inc.	abuse@in2net.com
InsaneNames LLC	abuse@namebright.com
Instra Corporation Pty, Ltd.	abuse@instra.com
Internet Domain Service BS Corp	abuse@internet.bs
Key-Systems GmbH	abuse@key-systems.net
Key-Systems, LLC	abuse@key-systems.net
Kingdomains, Incorporated	abuse@web.com
Ladas Domains LLC d/b/a Principium Strategies	abuse@principiumstrategies.com
Launchpad.com, Inc.	abuse@websitewelcome.com
LCN.COM Ltd.	abuse@lcn.com
Lemon Shark Domains, LLC	abuse@web.com
LEXSYNERGY LIMITED	abuse@lexsynergy.com
Ligne Web Services SARL dba LWS	abuse@lws.fr
LiquidNet Ltd.	abuse@liquidnetlimited.com
Marcaria.com International, Inc.	abuse@marcaria.com
MarkMonitor Inc.	abusecomplaints@markmonitor.com
Mat Bao Corporation	abuse@matbao.com
Media Elite Holdings Limited	billing@registermatrix.com
Megazone Corp. dba Hosting.kr	abuse@hosting.kr
Melbourne IT Ltd	abuse@melbourneit.com
Mesh Digital Limited	abuse.contact@hosteuropegroup.com
Metaregistrar BV	abuse@metaregistrar.com
Mijn InternetOplossing B.V.	abuse@mijninternetoplossing.nl
Misk.com, Inc.	abuse@misk.com
Moniker Online Services LLC	abuse@moniker.com
Name Connection Area LLC	abuse@web.com

Name Nelly Corporation	abuse@web.com
Name.com, Inc.	abuse@name.com
NameCheap, Inc.	abuse@namecheap.com
NameJolt.com LLC	abuse@NameBright.com
NameKing.com, Inc.	abuse@nameking.com
NamePal.com #8011	abuse@web.com
NamePal.com #8016	abuse@web.com
NamePanther.com LLC	abuse@web.com
Namesaplenty LLC	abuse@web.com
NameScout Corp	abuse@rebel.com
NameSilo, LLC	abuse@namesilo.com
NameWeb BVBA	law-enforcement-only@nameweb.biz
Naugus Limited, LLC.	abuse@naugus.com
NetArt Sp z o.o	abuse@netart-registrar.com
NetEarth One Inc. d/b/a NetEarth	a-b-u-s-e.whois.field@netearthone.com
Netowl, Inc.	registrar-abuse@netowl.jp
NetTuner Corp. dba Webmasters.com	abuse@webmasters.com
Network Solutions, LLC.	abuse@web.com
Nhan Hoa Software Company Ltd	dunght@nhanhoa.com.vn
Nicco Ltd.	accreditation@nicco.com
Nics Telekomunikasyon Tic Ltd. Sti.	abuse@nicproxy.com
Nom-iq Ltd. dba COM LAUDE	abuse@comlaude.com
Nominalia Internet S.L.	abuse@nominalia.com
Octopusdomains.net LLC	abuse@web.com
Omnis Network, LLC	abuse@omnis.com
One.com A/S	abuse@one.com
Online SAS	abuse@bookmyname.com
OnlineNIC, Inc.	abuse@onlinenic.com
OpenTLD B.V.	abuse@freenom.com
Oracle America, Inc.	abuse@dyn.com
OregonURLs.com LLC	abuse@web.com
OVH	abuse@ovh.net
P.A. Viet Nam Company Limited	abuse@pavietnam.vn
Paragon Internet Group Ltd t/a Paragon Names	abuse@paragonnames.com
Pararescuedomains.com, LLC	abuse@web.com
PDR Ltd. d/b/a PublicDomainRegistry.com	abuse@publicdomainregistry.com
Pheenix Inc.	tan@pheenix.com
PIR Special Projects	abuse@pir.org
PlanetHoster Inc.	abuse@support.planethoster.net
Porkbun LLC	abuse@porkbun.com
Ports Group AB	abuse@portsgroup.se
PSI-USA, Inc. dba Domain Robot	domain-abuse@psi-usa.info
RealTime Register BV	realtimeregisterabuse.com@mydomainprovider.com

Rebel Ltd	abuse@rebel.com
Rebel.ca Corp.	abuse@rebel.com
REG2C.COM, INC.	abuse@reg2c.com
Regional Network Information Center, JSC dba RU-CENTER	tld-abuse@nic.ru
REGISTER NV DBA REGISTER.EU	abuse@register.eu
Register.com, Inc.	abuse@web.com
Register.it SPA	abuse@register.it
Registrar of Domain Names REG.RU, LLC	abuse@reg.ru
RegistryGate GmbH	abuse@registrygate.com
Ripcurl Domains, LLC	abuse@web.com
SafeNames Ltd	abuse@safenames.net
Search Rebel, LLC.	gpd-r-godaddy@hotmail.com
Searchnresq Inc.	abuse@web.com
Shanghai Meicheng Technology Information Development Co., Ltd.	domain@cndns.com
Shining Star Domains, LLC	abuse@web.com
Shinjiru Technology Sdn Bhd	abuse@ilovewww.com
Sibername Internet and Software Technologies Inc.	bulent.turkoglu@sibername.com
Site Matrix LLC	abuse@profilebuilder.com
SiteName Ltd.	abuse@galcomm.com
Slow Motion Domains LLC	abuse@web.com
Small Business Names and Certs, Incorporated.	abuse@web.com
Soluciones Corporativas IP, SL	abuse@scip.es
Tecnocratica Centro de Datos, S.L.	abuse@tecnocratica.net
The Registrar Company B.V.	abuse@theregistrarcompany.com
TierraNet Inc. d/b/a DomainDiscover	abuse@tierra.net
TLD Registrar Solutions Ltd	abuse@tldregistrarsolutions.com
TLDs, LLC dba SRSplus	abuse@web.com
TPP Wholesale Pty Ltd.	abuse@tppwholesale.com.au
Trademark only	whois.namebright.com
Trademark only	whois.dynadot11.com
Trademark only	whois.namespro.ca
Trademark only	whois.neen.it
Trademark only	whois.pairnic.com
Trademark only	whois.hostingservicesinc.net
Trademark only	abuse@vodien.com
Trademark only	whois.nuxit.com
Tucows Domains Inc.	domainabuse@tucows.com
TurnCommerce, Inc. DBA NameBright.com	abuse@namebright.com
Uniregistrar Corp	abuse@uniregistry.com
united-domains AG	abuse@united-domains.de
URL Solutions Inc.	abuse@pananames.com

Vautron Rechenzentrum AG	hu@vautron.de
Vitalwerks Internet Solutions LLC DBA No-IP	abuse@noip.com
Web Commerce Communications Limited dba WebNic.cc	compliance_abuse@webnic.cc
Web4Africa Inc	abuse@web4africa.net
West263 International Limited	abuse@hkdns.hk
White Rhino Domains, LLC	abuse@web.com
Whoisnetworks Co., Ltd.	abuse@yesnic.com
Wild West Domains, LLC	abuse@wildwestdomains.com
World4You Internet Services GmbH	abuse@world4you.com
Xiamen 35.Com Technology Co., Ltd.	abuse@35.cn
Xin Net Technology Corporation	supervision@xinnet.com
ZigZagNames.com LLC	abuse@web.com

Appendix B – Consumer Protection / Intellectual Property Claims Templates

TRADEMARK

To [Registrar/Registry]

I write on behalf of the [company] to request domain registration records as described below. We have become aware that the below-listed domain names misuse one or more of the following trademarks:

Trademark	US Trademark Reg. #	EU Trademark Reg. #	Registry
[trademark]	[us trademark number]	[eu trademark number]	[eu trademark registry]

The fame and recognition of [this/these mark/marks] entitles [company] to broad legal protection globally. [This/These trademark registration entitle [company] to legal protection globally]

In order to investigate and prevent intellectual property infringement and to contact infringing parties and relevant service providers, we request information regarding the following domain names:
[domains]

We seek the following information from the non-public WHOIS consistent with the principles enumerated under Section 4 of the Temporary Specification for gTLD Registration Data adopted by ICANN on May 18, 2018:¹

- 1) Registrant name, address, phone, fax number, and email address
- 2) Technical contact name, address, phone, fax number, and email address
- 3) Administrative name, address, phone, fax number, and email address

To the extent that the requested information is believed to be subject to the European Union's General Data Protection Regulation (Commission Regulation (EU) 2016/679), we submit this request pursuant to Article 6(1)(f) of that Regulation. The information requested is necessary for the purposes of our legitimate interests, namely (1) identifying the registered holder of a domain name and their contact information to investigate and respond to potential trademark infringement and (2) enforcing legal claims.

We seek this information by [DEADLINE = 48hrs from now] in order to facilitate legal action against the registrant. Please provide the requested information by responding to this email.

NOTE: Please do not change the subject line of this email.

[company]
[and - transmitted [company agent]

¹ <COMPANY NAME> [and its affiliated companies] reserves all of its legal rights in relation to this request and by making this request with respect to the domain name referenced above does not waive any and all rights it may have to request additional information regarding other domain names registered by the registrant or the contacts reflected in the WHOIS record.

COPYRIGHT

To [Registrar/Registry]

I write on behalf of the [company] to request domain registration records as described below. We have become aware that the below-listed domain[s] include content for which [company] owns the copyright. Specifically, [company] owns copyrights for which [company] has received copyright registrations.

In order to investigate and prevent intellectual property infringement and to contact infringing parties and relevant service providers, we request information regarding the following domain names:

[domain list]

We seek the following information consistent with the principles enumerated under Section 4 of the Temporary Specification for gTLD Registration Data adopted by ICANN on May 18, 2018:²

- 1) Registrant name, address, phone, fax number, and email address
- 2) Technical contact name, address, phone, fax number, and email address
- 3) Administrative name, address, phone, fax number, and email address

To the extent that the requested information is believed to be subject to the European Union's General Data Protection Regulation (Commission Regulation (EU) 2016/679), we submit this request pursuant to Article 6(1)(f) of that Regulation. The information requested is necessary for the purposes of our legitimate interests, namely (1) identifying the registered holder of a domain name and their contact information to investigate and respond to potential copyright infringement and (2) enforcing legal claims.

We seek this information by [DEADLINE = 48 hrs from now] in order to facilitate legal action against the registrant. Please provide the requested information by responding to this email.

NOTE: Please do not change the subject line of this email.

[company]
[and - transmitted [company agent]]

² <COMPANY NAME> [and its affiliated companies] reserves all of its legal rights in relation to this request and by making this request with respect to the domain name referenced above does not waive any and all rights it may have to request additional information regarding other domain names registered by the registrant or the contacts reflected in the WHOIS record.

TRADEMARK and ABUSE

To [Registrar/Registry]

I write on behalf of the [company] to request domain registration records as described below. We have become aware that the below-listed domain names misuse one or more of the following trademarks, including:

Trademark	US Trademark Reg. #	EU Trademark Reg. #	Registry
[trademark]	[us trademark number]	[eu trademark number]	[eu trademark registry]

In addition, we have become aware that the below-listed domain[s] include[s] malicious content or may be engaged in activities posing a cyber-security risk to [company] and its users.

In order to investigate and prevent this malicious behavior and intellectual property infringement, determine the scope of the abuse, and contact infringing parties and relevant service providers, we request information regarding the following domain names:

[domains]

We seek the following information consistent with the principles enumerated under Section 4 of the Temporary Specification for gTLD Registration Data adopted by ICANN on May 18, 2018:³

- 1) Registrant name, address, phone, fax number, and email address
- 2) Technical contact name, address, phone, fax number, and email address
- 3) Administrative name, address, phone, fax number, and email address

To the extent that the requested information is believed to be subject to the European Union's General Data Protection Regulation (Commission Regulation (EU) 2016/679), we submit this request pursuant to Article 6(1)(f) of that Regulation. The information requested is necessary for the purposes of our legitimate interests, namely identifying the registered holder of a domain name and their contact information, to address threats to online security and request that service providers remove trademark infringing content.

We seek this information by [DEADLINE = 48hr from now] in order to facilitate legal action against the registrant. Please provide the requested information by responding to this email.

NOTE: Please do not change the subject line of this email.

[company]
[and - transmitted [company agent]

³ <COMPANY NAME> [and its affiliated companies] reserves all of its legal rights in relation to this request and by making this request with respect to the domain name referenced above does not waive any and all rights it may have to request additional information regarding other domain names registered by the registrant or the contacts reflected in the WHOIS record.

OTHER TOS

To [Registrar/Registry]

I write on behalf of the [company] to request domain registration records as described below. We have become aware that the below-listed domain[s] include[s] content that violates [company] terms of service, potentially confusing and/or harming its users.

In order to investigate and determine the scope of this abuse, and to prevent or mitigate this behavior, we request information regarding the following domain names:

[domains]

We seek the following information consistent with the principles enumerated under Section 4 of the Temporary Specification for gTLD Registration Data adopted by ICANN on May 18, 2018:⁴

- 1) Registrant name, address, phone, fax number, and email address
- 2) Technical contact name, address, phone, fax number, and email address
- 3) Administrative name, address, phone, fax number, and email address

To the extent that the requested information is believed to be subject to the European Union's General Data Protection Regulation (Commission Regulation (EU) 2016/679), we submit this request pursuant to Article 6(1)(f) of that Regulation. The information requested is necessary for the purposes of our legitimate interests, namely enforcing [company] terms and conditions and preventing misuse of its services.

We seek this information by [DEADLINE = 48hrs from now] in order to facilitate legal action against [DM8] the registrant. Please provide the requested information by responding to this email.

NOTE: Please do not change the subject line of this email.

[company]
[and - transmitted [company agent]]

⁴ <COMPANY NAME> [and its affiliated companies] reserves all of its legal rights in relation to this request and by making this request with respect to the domain name referenced above does not waive any and all rights it may have to request additional information regarding other domain names registered by the registrant or the contacts reflected in the WHOIS record.

ABUSE

To [Registrar]

I write on behalf of the [company] to request domain registration records as described below. We have become aware that the below-listed domain names misuse one or more of the following trademarks, including:

Trademark	US Trademark Reg. #	EU Trademark Reg. #	Registry
[trademark]	[us trademark number]	[eu trademark number]	[eu trademark registry]

The below-listed domain[s] include[s] malicious content posing a risk to [COMPANY] and its users. Specifically, [DESCRIBE]

In order to investigate and determine the scope of this abuse, and to prevent or mitigate this behavior, [COMPANY] requests information regarding the following domain names:

[DOMAINS]

We seek the following information consistent with the principles enumerated under Section 4 of the Temporary Specification for gTLD Registration Data adopted by ICANN on May 18, 2018:⁵

1. Registrant name, address, phone, fax number, and email address
2. Technical contact name, address, phone, fax number, and email address
3. Administrative name, address, phone, fax number, and email address

To the extent that the requested information is believed to be subject to the European Union's General Data Protection Regulation (Commission Regulation (EU) 2016/679), we submit this request pursuant to Article 6(1)(f) of that Regulation. The information requested is necessary for the purposes of our legitimate interests, namely responding to or preventing malware, fraud, hacking, spying, and other threats to online privacy and security. Recital 47 of the Regulation explicitly lists fraud prevention as a legitimate interest, stating "the processing of personal data strictly necessary for the purposes of preventing fraud also constitutes a legitimate interest of the data controller concerned."

We seek this information by [DEADLINE] in order to facilitate legal action against the registrant. Please provide the requested information by [METHOD].

[company]
[and - transmitted [company agent]

⁵ <COMPANY NAME> [and its affiliated companies] reserves all of its legal rights in relation to this request and by making this request with respect to the domain name referenced above does not waive any and all rights it may have to request additional information regarding other domain names registered by the registrant or the contacts reflected in the WHOIS record.