

WHOIS Open Consultation Feedback

Comments Provided by Online Form

Your new policy is a mess as far as I'm concerned.

The worst thing is not showing the true expiry date of the domain. It seems like you are only showing it one year ahead - or perhaps it is domainsatcost.ca who is only renewing it one year ahead even when we've paid for multiple years. For hosting providers like us, it provides much confusion. We and the customers panic to try and renew domain names that have already been paid for.

Restricting the whois information in the way

you have done, makes it almost difficult for hosting providers such as ourselves to respond to our customer's desire to move a domain name to new hosting or get control of an existing domain they own.

Most people and companies lose track of their domain name registration. Their contact person leaves or retires, their e-mail address changes and they do not update them, they lose their registrar login info.

If we at least know the name and e-mail address of the owner/admin contact, then we can tell if it will be difficult to wrest control of a domain because the email is stale or if its going to be some complicated process to re-establish the login at the registrar. This is especially a disaster when you have a two-tier domain reseller in play such as tu cows/opensrs.

After all is said and done, the registration system is a mess and your whois policy makes it worse.

J. Carl Wagar

jcwagar@entrenet.com

TheHostingService.ca

Bonjour, je considère que les propositions sont adéquates et correspondent bien à nos besoins.

Par ailleurs, je n'ai jamais eu de problème avec la gestion de mon domaine (<http://rambit.qc.ca>) en plus de 10 ans, et ce malgré plusieurs modifications que j'ai eu à effectuer.

merci,

Alain

rambit.qc.ca

The major problem here is balancing the need to know with the need for privacy.

Experience thus far has shown that in many TLDs some domain owners have chosen anonymizing registrants. Unfortunately, all too many domain owners using anonymizing registrants are operating commercial businesses with questionable business practices or even downright fraudulent "businesses" or scams. This means that I do not trust operations that use an anonymous type registration.

At the same time, many registrants use throw away mail accounts on Yahoo!, Hotmail, gmail etc. Many corporations forget to update their registrant contact information, or use the name of a company officer who hasn't a clue as to what it's all about anyway! Others include fraudulent information such as 555-xxxx phone numbers to protect their privacy. So the whois info is all too often invalid anyway!

In an effort to balance privacy with need to know, therefore, it is my belief that whois information should include

- 1) Contact name
- 2) Position in organisation, or "Individual"
- 3) City where the contact is located
- 4) email address at contact's option
- 5) phone number at contact's option
- 6) domain owner's registrar

Domain owners should not be able to substitute a 3rd party for anonymizing themselves, except for the registrar, and even then the domain owner contact info must be on file with CIRA.

Full information for the domain should be available with a justified request from CIRA or the domain's registrar.

Releasing personal information without a court order may be in line with CIRA's policy, but it is not in line with Canadian law.

What is your overall level of satisfaction with the new WHOIS Disclosure Policy given the experience of the last 12 months? What are the main reasons for your view?

Did not know there was a new policy. Did not know that the policy was being revised. Do not know why a revision was needed.

CIRA's WHOIS Disclosure Policy was designed to strike an appropriate balance between protecting the privacy of individual Registrants and providing timely mechanisms for legitimate information requests by stakeholders such as intellectual property interests and law enforcement agencies. In your view, how effective is the Policy in striking this balance?

I do not understand these issues. Why do IP interests need this info? What is an "IP interest"? Law enforcement agencies IN CANADA (not foreign) should have access as needed within the scope of our individual rights under common law.

What specific changes, if any, would you recommend to make the Policy more effective at striking this balance? Why would you recommend these changes?

Again, I do not understand these issues, so I cannot make informed comments.

I am:

USERNAME:

PASSWORD:

Truly,

Paul Larocque, Chartered Chemist, FTOPRA

President

ACERNA Incorporated

Tel.: 905-472-5747 E-mail: paul.larocque@acerna.ca www.Acerna.ca

The information should be protected not only for one yr. It should be for ever unless some wish to be public.

I am whole-heartedly in agreement with the new policy.

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I highly value the way CIRA is protecting my personal information online. I have a personal domain registered, which means that the WHOIS registry contains my home address and phone number. Having this information protected on the web is very important to me.

Also, I must commend CIRA on the mechanism by which people can still contact me via CIRA's "online Message Delivery Form". I believe this is the way all registrars should be protecting their members.

Big THANK YOU!

At the same time, I recognize that in some cases domain owners might want to provide their information online, and CIRA's mechanism for turning the privacy off addresses such case. In all, a well balanced approach.

Best Regards,

Marcin Komorowski

I think the policy has for the most part been a positive step forward. It protects individuals and firms from datamining of information by internet crawlers while permitting legitimate inquiries.

The one drawback it does have is it removes a tool for "grassroots" policing. That is to say individuals in seeing something amiss or not quite right could tell by a simple query of the information for the domain if it was being held by a "domain collector", cybersquatter, or ineligible registrant.

It's a fine balance to strike and a difficult one.

CYBER SQUATTING:

Many Canadian companies do not use .ca names due to cyber squatting. CIRA should be doing contact information management via phone automation as well. Example every year I renew my domains. I should receive calls for each domain to ensure my registered phone number is correct. This would cut down cyber squatters and ensure the WHOIS contact information is correct.

It's no longer about "protecting individual privacy" it's about allowing malicious people to hide!

I run a download listing site & we have been forced to revise our rules regarding domain owner anonymity. A rising number of owners of malicious websites & programs are hiding behind anonymous domain registrations/services. This is a serious security risk which most of the registrars refuse to respond to or address. It is

now our policy NOT to accept submissions where no information about the author is available from our form, the author's website or the domain registration.

MINIMAL information is acceptable - name; location; email address.

It's hardly a problem now with all the free email with good filters that is available. So you get some spam, deal with it! filter it out or dump it in the trash where it belongs. No way to contact you, or only a redirect service, can mean you don't get a message that your website is unavailable!

Dee Hughes - Nova Scotia

L'ACEI fait une erreur en modifiant sa politique en matière de confidentialité du service WHOIS! Le détenteur d'un domaine devrait obligatoirement divulguer son identité, ainsi qu'une adresse et un numéro de téléphone valide. L'ancienne politique était tout à fait convenable.

As a long time user of the internet, I realise that it isn't the collegial group of friends it once was. The use of the net for unintended purposes such as identity theft makes the hiding of personal information more and more necessary. However, internet criminals should not be able to hide behind the anonymity of the net either. Therefore I feel that:

1) The publicly available whois record should contain only the minimum necessary to make contact. The system CIRA uses is very good.

2) CIRA should be very reluctant to hand over information without a very good reason and perhaps the only good reason would be a court order or subpoena. In this case, CIRA should be generous with the information.

Thanks for the opportunity to comment.

Tim Allman
Amount of information released seems fine to me

Comments Provided by Email

From: laprange@gmail.com on behalf of Laurie Prange-Martin [prangeresearch@gmail.com]

Sent: Monday, September 21, 2009 2:22 PM

To: Sheila Bergeron

Cc: Christie Jamieson; Pamela Ward

Subject: Re: Reminder: CIRA WHOIS Members' Forum will close September 24, 2009/ Rappel : Le Forum pour les membres du service WHOIS fermera le 24 septembre 2009

If they're going to be incorporated into the report, I guess I should give some more information about me to give some context to why I sent my email, huh? As a librarian, I know all about writing reports about implementing privacy policy so I can imagine the work you have in front of you!

My blog address is LaurieTheLibrarian.ca and I host it on the site electrified.ca where I also run the Northern Research Network (<http://northernresearchnetwork.electrified.ca/>) for my husband. We live in one of the most isolated areas of Canada, specifically Whitehorse, Yukon.

I could have set-up a domain address with any end to the address, but it was important to me that I had something Canadian. And as someone who teaches students about responsible online browsing, I know that the URL of a website is incredibly important. I wanted mine to have a Canadian identity, but that's not the main reason why we have continued to run our sites.

Our sites are our way of networking with peers. Living in the Yukon, these networking opportunities are crucial because we have no peers with whom to network with locally due to the sparse population of the North and the extreme expense it costs to travel south. We would have far less opportunities to network if we didn't have our sites. Having a .ca site is not about making money, which is probably good 'cause we've never made any and the sites actually costs us hosting fees, but they can pay in other ways. For example, both of us have had our expenses paid to attend and/or present at several conferences in our field down south all based upon the expertise that we showcase on our sites, sites which are identified as being Canadian.

While it seems that the vast majority of sites out there that are .ca are run by companies trying to sell products, they are still a few of us out there running .ca websites out of a love to use the Internet to share information without charging money. But we also don't want to be anonymous. Instead, we want the right to control how much information there is online about us and our home address is one of those pieces of information we would rather not have online.

The new privacy rules are the right thing to keep .ca members like us happy and we truly appreciate CIRA taking these steps!

On Mon, Sep 21, 2009 at 10:27 AM, Sheila Bergeron <sheila.bergeron@cira.ca> wrote:

Hi Laurie,

Thank you for your email regarding our forum and privacy policy. I appreciate you taking the time to give me your feedback.

I will ensure that your feedback is incorporated into our report on this consultation.

Sincerely,

Sheila Barrows
Marketing Manager
Canadian Internet Registration Authority (CIRA)

From: laprange@gmail.com [mailto:laprange@gmail.com] **On Behalf Of** Laurie Prange-Martin

Sent: September 21, 2009 12:41 PM

To: Sheila.Barrows@cira.ca

Subject: Re: Reminder: CIRA WHOIS Members' Forum will close September 24, 2009/ Rappel : Le Forum pour les membres du service WHOIS fermera le 24 septembre 2009

Hi Sheila,

I just want to say that I REALLY appreciate that this privacy policy exists. I set-up my blog several years ago and was disturbed to discover that my personal information was available online for anyone to see; something a single woman living alone never wants, which I was at the time. I sent an email complaining about this practice and eventually this new policy came into being.

As someone who has benefited from this policy, I wanted to send you a thank you note for your hard work and those of your colleagues but the forum was too public for me so I thought I'd send this email instead.

Thank you for this privacy policy!

My best regards,
Laurie

From: Paul Larocque [paul.larocque@sympatico.ca]

Sent: Tuesday, July 07, 2009 4:32 PM

To: CIRA Consultation

Subject: CIRA Open Consultation: Input on the WHOIS Disclosure Policy

From your email link, I do not know how to respond! There is no link to tell Strategic Counsel my views! So, here they are: please forward my views on to Strategic Counsel.

- What is your overall level of satisfaction with the new WHOIS Disclosure Policy given the experience of the last 12 months? What are the main reasons for your view?

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- What specific changes, if any, would you recommend to make the Policy more effective at striking this balance? Why would you recommend these changes?

Again, I do not understand these issues, so I cannot make informed comments.

I am:

USERNAME: paul.larocque

PASSWORD: password01539

Truly,

Paul Larocque, Chartered Chemist, FTOPRA

President

ACERNA Incorporated

Tel.: 905-472-5747 E-mail: paul.larocque@acerna.ca www.Acerna.ca

From: YCS [mailto:ycs@ycs.yk.ca]
Sent: September 17, 2009 7:21 PM
To: Sheila.Barrow@cira.ca
Subject: WHOIS Privacy Policy

Hello Sheila,

I just received our invitation to participate in the CIRA WHOIS Members Forum, and I would like to make my recommendation here and now, as we cannot participate.

We are in favour of public access to domain name registrants' name and contact information. More details than that should be requested directly from the domain name registrant.

Thank you for inviting this input from the CIRA membership.

Sincerely,

Georgia Greetham

Office Coordinator

Yukon Conservation Society

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YCS pursues ecosystem well-being throughout the Yukon and beyond, recognizing that human well-being is ultimately dependent upon fully functioning healthy ecosystems.