January 5th, 2017

Göran Marby, President & CEO, ICANN
Dr. Stephen Crocker, Chair, ICANN Board of Directors

Dear Mr. Marby, Dr. Crocker and ICANN Directors:

The Commercial Business Users Constituency, the Intellectual Property Constituency, and the Internet Service Providers Constituency are writing to request that ICANN make the collection and publication of data a priority, and that the Board and CEO commit to expeditiously providing the public with unfettered, routine access to raw, unfiltered data related to ICANN's mission.

It is difficult to know where and how to bring our outside expertise to bear in support of ICANN's mission without access to datasets that define the organization's operations and effectiveness. We believe, in the interest of transparency, that ICANN must make that data more easily available on an ongoing basis. Doing so would help the community understand what data exists and what information, metrics and analysis can be gleaned from it. Such transparency also would assist the community in prioritizing areas of greatest need, enabling us to engage staff in a discussion about solutions, identify additional data that may be helpful, and chart a course for making the information available publicly in a complete and timely way.

ICANN has (or has access to) the following datasets, and our constituencies call on ICANN to make them publicly available now. Please note that we are seeking access to datasets – that is, raw data, measurements or analytics that offer insight into the operation of the identifier system – personally identifiable information and business proprietary information should be excluded.

- Historical and ongoing zone file data
- Historical and ongoing WHOIS system performance and compliance data
- Historical and ongoing Compliance data
- Anonymized pricing data
- Domain block list data
- DNSSEC implementation/deployment data beyond the top-level
- Domain abuse data (a broad and deep category within which our constituencies have provided detailed data collection recommendations) (data that may provide direct information about potential attack vectors should not be shared)

We also think that ICANN has, or has access to, other datasets not listed above. While we believe that ICANN should move expeditiously to make the actual datasets listed above available, we also believe, in the interests of transparency, that ICANN should tell us what other datasets they have. This is consistent with the stated goal of the Open Data Initiative. Making such an inventory public would help the community understand what data is available and what information, metrics and analysis could be gleaned from that data. It also would assist the community in assessing priorities for making specific datasets immediately available, and enable us to engage staff in a discussion about their approach to these datasets. We note that, for numbering resources, the Regional Internet Registries have long committed to transparent, routine and unfettered release of data related to addressing and numbering resources on the Internet. The same should be true for data related to the DNS and the registrar/registry ecosystem that supports the DNS. Not only should ICANN provide the public repository of raw data, but it should also provide an API for accessing and manipulating the data - so that the community is not stymied in use of the data by incompatible formats or difficult-to-use access techniques. Here are two (out of many) examples that illustrate our point: Several new gTLD registries are not providing daily zone file data as contractually obligated and the construct of the Centralized Zone Data Service limits its utility; and limited ICANN Compliance data is published in the form of selective graphics and summary reports which are of little use, rather than publishing programmatically accessible data that can facilitate further analysis by the community.

ICANN's founding mission, as stated in its Bylaws, is to coordinate, at the overall level, the global Internet's systems of unique identifiers, and in particular to ensure the stable and secure operation of these related systems. This is instantiated in ICANN's Strategic Plan, which commits ICANN to "Support the evolution of domain name marketplace to be robust, stable and trusted" and "Foster and coordinate a healthy, secure, stable, and resilient identifier ecosystem." Underpinning these goals, objectives, and responsibilities is ICANN's ability to collect and publish relevant data. After years of delay, we were pleased to see initiatives such as the Open Data Initiative, the Identifier Technology Health Initiative, the DNS Abuse Study, and the gTLD Marketplace Health Index recently get underway. We are concerned, however, that these efforts are in their infancy or moving very slowly, do not seem to have the necessary resource or expertise to properly advance, may be inhibited by staff opinion regarding which data they do and do not want to see in the public sphere and, in the case of the gTLD Marketplace Health Index, seem to be developed to promote gTLDs rather than to provide a meaningful, comprehensive set of metrics that truly address the stability and trust of gTLDs.

As former Board Director, Bruce Tonkin, recently stated, "If ICANN collects the data then the ICANN community owns the data – it's all of our data." We see unrestricted, ongoing access to a range of data as a top priority and a critical test of the post-transition ICANN's commitment to transparency and accountability.

We look forward to receiving expeditious access to the data listed above and a list of other datasets to which ICANN has access. If there are perceived impediments to publishing any of this data, please contact us as soon as possible so that we have an opportunity to quickly work through these issues and reach our shared goal.

Sincerely,

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Intellectual Property Constituency: ipc-gnso@icann.org