

April, 2017

Dear.....

ICANN – a huge disappointment and a worry

The Internet Corporation for Assigned Names and Numbers (ICANN) is the global body with responsibility for running key parts of the internet. It is legally domiciled in California.

Inter alia, ICANN is responsible for “keeping the internet secure”. As you will see from the examples provided in the attached briefing ICANN has **not** been keeping the internet secure for children. This has led to real dangers that could have been prevented or mitigated.

ICANN’s revenues are derived from the sale of website addresses (domain names). The money reaches ICANN via Registries and Registrars who are therefore its effective paymasters. One Registry (Verisign) and one Registrar (Go Daddy) between them account for over 40% of ICANN’s operational income in the current year.

ICANN, the Registries and the Registrars have an obvious financial interest in increasing the number of domain names being sold. This interest appears to have blinded them to a larger obligation to protect the weak and vulnerable e.g. in this instance children.

Historically there was only a small number of so-called “generic top level domains” e.g. .com. org and .net. In 2012 ICANN began a process which led to the creation of over 1,000 new ones. Pursuant to this ICANN established a domain called “.kids”.

Who is going to win the global contract to run the .kids domain in the English language is still not decided. Amazon and Google are in contention. However, thanks to ICANN’s obscure processes we recently discovered ICANN had in fact already let .kids in Cyrillic script. Yet ICANN made no stipulations to ensure known paedophiles would not be able to buy or operate a website within the domain. Neither did they make stipulations forbidding known paedophiles from working for a company or organization operating such a site.

Obviously there is a risk this could be repeated when .kids in English is finally decided and while we are sure both Google and Amazon will choose to do the right thing, whichever one is the eventual winner of the contract, the point is matters of this kind should never have been left as an option. By not making even the most rudimentary child protection practice compulsory for domains that pitch directly to children ICANN was grossly negligent and if ICANN does not change its approach it could happen again with other child focused domains in other languages.

What happened with .kids stands in sharp contrast to what happened when the .bank, .pharmacy, .insurance and a number of other domains were created as a result of the same 2012 process. In the latter cases a “pre-approval” procedure was developed to minimise or eliminate the possibility of bad actors being able to buy or run a banking, insurance or pharmaceuticals website. So far there are no known cases of misuse.

On a different point, down the years the domains where the lion’s share of child abuse images have been found is .com and .net, both owned by Verisign (see above). On 3rd April 2017, the Internet Watch Foundation, the UK’s hotline, released numbers showing that .com and .net accounted for 70% of all child abuse images reported in 2015. The IWF’s numbers also showed

that in amongst the *new* post-2012 domains, criminals have started spreading child abuse images on a significant scale. In 2016 IWF took action against 272 websites involving over 1,550 web addresses. This represents an increase of over 200% and almost 400% respectively on 2015, demonstrating that a trend is taking root and gathering pace.

Allowing these new domains to be created added to ICANN's, Registries' and Registrars' income streams. Plainly it is also adding to an already terrible global problem in relation to the spread of child abuse images over the internet. Faced with a choice about whether or when to create the new gTLDs ICANN could have chosen not to proceed until stronger security measures could be put in place to reduce the scope for misuse, perhaps by insisting that the true identities and location details of every web site owner are verified and known. They didn't do this.

Stricter controls of this type cost money and therefore would eat into the profit margins of the Registries and Registrars and ultimately into ICANN's revenues while at the same time potentially depressing sales of domain names because crooks wouldn't buy as many.

ICANN is an independent organization. No single government can direct its actions but the ICANN Board have to listen if a large enough number of governments, public agencies and citizens speak out. For that reason, as you will gather from the briefing paper, children's organizations across the world are asking their national Governments and a number of intergovernmental agencies to make their views known to the ICANN Board in particular through ICANN's Government Advisory Committee. ICANN must be persuaded to acknowledge they have a duty of care to children then act accordingly.

Yours sincerely,