

# Neustar<sup>®</sup> Registry Services

## .US REGISTRY BASED PRIVACY SERVICE PLAN

Prepared for:



Submitted by Neustar, Inc.

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# .US Registry Based Privacy Service Plan

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## **usTLD PRIVACY SERVICE PLAN REQUEST FOR PUBLIC COMMENT**

The usTLD Stakeholder Council (“Council”) and Neustar, Inc. (“Neustar”), the registry operator for the usTLD, is seeking public comment on its recommendation to allow for the implementation of a registry-based wholesale privacy registration service in the .US Top Level Domain. Stakeholders at the 2015 usTLD Stakeholder Town Hall identified the lack of privacy services as a key issue suppressing domain name registration in the .US TLD. In an increasingly competitive landscape, in which many of the competitors to .US allow some type of privacy or proxy service, Neustar and the Council want to increase domain name registrations to ensure a robust, healthy namespace and believe that the implementation of such services will put .US on an equal footing with its closest competitors in both the generic and country code top-level domain namespaces.

### **BACKGROUND**

Neustar operates registry services for the usTLD pursuant to a contract with the Department of Commerce. Currently, that contract does not allow for the provision of privacy services. When a registrant buys a domain name, registry policy in line with industry standards require registrars to obtain and provide to the registry, the registrant’s contact information, including name, physical address, email address, and phone number. This information is publically available in the WHOIS database, a searchable directory that holds all the contact information for domain name registrants. The WHOIS database is freely searchable by anyone with access to the internet. In these times of increased awareness of the dangers of identity theft and other threats, many registries and registrars offer privacy services to their registrants. A privacy service lists alternative, reliable registrant contact information in WHOIS, while keeping the domain name registered to its beneficial user, the registrant.

The Council is requesting your comments on a plan that will be submitted to the Department of Commerce that will request authority under the contract to allow privacy services to be implemented for .US.

### **QUESTIONS**

The Council is seeking public comments on the following questions:

- Do you support the implementation of privacy services for .US domain name holders?
- What issues, if any, will registrars have with implementing privacy services as set forth in the plan?
- Does the plan adequately address the concerns of law enforcement while preserving the expected level of privacy of registrants who request the service?

Comments will be published and provided to the usTLD Stakeholder Council and Secretariat for consideration. Comments or questions may be submitted by emailing [stakeholdercouncil@neustar.us](mailto:stakeholdercouncil@neustar.us).

## INTRODUCTION

When a registrant buys a domain name, registry policy in line with industry standards require registrars to obtain and provide to the registry, the contact information, including name, physical address, email address, and phone number. This information is publically available in the WHOIS database, a searchable directory that holds all the contact information for domain name registrants. The WHOIS database is freely searchable by anyone with access to the internet. In these times of increased awareness of the dangers of identity theft, spamming, spoofing, and, more recently, swatting and doxing, many Domain Name Registries and registrars offer the allowance of privacy and proxy services to their registrants. These services allow registrants to keep their contact information private from the general public while continuing to maintain genuine registrant data per policy requirements. A privacy service lists alternative, reliable registrant contact information in WHOIS, while keeping the domain name registered to its beneficial user, the registrant. A proxy service registers the domain name itself and licenses use of the domain name to its customer. In both cases, the contact information of the service provider is displayed rather than the customer's identifying data.

At the 2015 Stakeholder Town Hall, the .US Stakeholder Council (the "Council") and other interested parties identified the lack of privacy and proxy services as a key issue suppressing registration in the .US TLD. In an increasingly competitive landscape, in which many of the competitors to .US allow some type of privacy or proxy service, .US needs to be able to offer registrants and registrars certain capabilities to remain competitive. Neustar and the Council want to increase domain name registrations to ensure a robust, healthy namespace and believe that the implementation of such services will put .US on an equal footing with its closest competitors in both the generic and country code top-level domain namespaces.

The Council formed a subcommittee to address the implementation of privacy and proxy services. Council member, with the exception of representatives from law enforcement agencies, supported the implementation of privacy and proxy services. Law enforcement agency representatives argued that .US should remain a namespace where all information about a registrant remains available and publically accessible in order to efficiently conduct WHOIS queries for investigative purposes, without notification to potential targets of an investigation. Law enforcement also expressed concerns that bad actors would be more likely to obtain .US domain names if they knew they could keep their contact information private. Law enforcement cited to the 2013 report *A Study of Whois Privacy and Proxy Service Abuse* by Richard Clayton and Tony Mansfield which found that maliciously registered domains "generally have a higher usage of privacy and proxy services than is the case for lawful and harmless activities." (<https://www.cl.cam.ac.uk/~rnc1/whoisstudy.pdf>). Despite law enforcement concerns, the other members of the subcommittee, and subsequently the Council, agreed that

Neustar should develop a plan for consideration by the Council that would provide registrants with the protection they demand ensuring to also address the concerns of law enforcement. It is in this context that Neustar is presenting this .US Registry based Privacy Services Plan (the “PSP”) for the .US Stakeholder Council.

This plan for implementing a privacy service for the .US TLD will have an important impact on the success of the .US namespace, as we will describe further below. At the same time, the service can provide access to information required by authorized law enforcement entities in a manner that will not disrupt registrars’ established business procedures. The primary goal of the proposed PSP is to provide registrants with the protections they demand, increasing the competitiveness of .US in the marketplace, without disrupting compliance and enforcement of the WHOIS accuracy and the .US nexus requirements for registrants per policies set up by the .US Registry.

Neustar’s plan addresses the needs of registrants, registrars, and law enforcement. Under the plan, Neustar will offer the privacy services to registrars for a nominal fee (e.g., \$0.50) that registrars can then resell to registrants at retail price. Neustar will act as the “privacy provider” and thereby remain the custodian of the authoritative contact information that can be accessed by law enforcement and other authorized parties with a lawful request.

## **BENEFITS TO THE USTLD AND STAKEHOLDERS**

Council members supporting this proposal believe implementing privacy services in the .US TLD will benefit registrants, registrars, law enforcement, and the .US TLD.

Registrants want the option to keep their contact details private. For example, bloggers who discuss provocative topics, religious and political activists, or others with a controversial view to share on .US domains currently cannot do so without making their contact information available in WHOIS. A potential registrant may in such a situation opt for another competing TLD option that offers privacy and proxy services when presented with the domain extension choices during the retail process.

Registrars, who may already offer privacy and proxy options for other TLDs, will be able to offer .US domain names on an equal basis with competing TLDs. Moreover, the implementation of a privacy service for .US may incentivize more registrars to offer .US domain names because they can sell the service at a markup alongside the .US domain name.

In the absence of privacy services, risk-averse registrants may choose to attempt to submit false or inaccurate information into WHOIS. This is problematic for law enforcement who need access to accurate WHOIS information and defeats the purpose of the WHOIS database. With the implementation of privacy services, the WHOIS

database may be more accurate and allow law enforcement to obtain the information it needs in one place - Neustar. As Neustar will receive the information in real time at the time of sale as is the current practice, the information available to law enforcement will be updated on a near real-time basis.

## BACKGROUND AND POLICY

The .US TLD is the country code top level domain for the United States of America, operated by the Department of Commerce and managed by Neustar. Today, there are more than 1.7 million .US domain names under management. Registrants include individuals, organizations, corporations, and localities that have crafted their domain names to emphasize US origins, geo-target content by bringing US consumers directly to the domestic sites or product offerings of international corporations, represent the word "us," or combine both the string to the left and right of the "." to spell out a word ending in the letters "u" and "s." It is an online home for the people, organizations, and corporations that make up the United States and for foreign businesses and multinationals providing services to the US market.

The National Telecommunications and Information Administration (NTIA), awarded the contract to manage the .US registry to Neustar in 2001. That contract and the subsequent renewal contract require domain name registrants to provide contact information for inclusion in the WHOIS database. In 2005, the NTIA issued a letter to Neustar clarifying its policy that privacy or proxy services were inconsistent with registrars' obligations under the *usTLD Registrar Accreditation and Registry-Registrar Agreement* to provide complete and accurate contact information for the WHOIS database, and instructed Neustar to direct all .US registrars to cease offering these services. The prohibition on privacy and proxy services is the result of an effort to provide complete and accurate WHOIS information for all .US domain names. Maintaining an accurate WHOIS database for .US registrants is of utmost importance to the .US registry. The database can be an important tool for law enforcement officers investigating serious criminal activity.

The policy restriction is enforced by .US registrars. Neustar does not directly enter into agreements with registrants. Section 3.6.13. of the *usTLD Registrar Accreditation and Registry-Registrar Agreement* states that:

*"Neither Registrar nor any of its resellers, affiliates, partners, and/or contractors shall be permitted to offer anonymous proxy domain name registration services which prevent the Registry from having and displaying the true and accurate data elements contained in Section 3.3 for any Registered Name."*

This is passed through to the registrants by way of registration agreements that a registrar must enter into for all of the .US registrations that it sponsors. This requirement is enforced through the WHOIS Accuracy Reporting Tool where users can report false or incomplete WHOIS records, and all such reports are investigated by Neustar. If inaccurate or incomplete information is not remedied within 10 days, the domain name may be deleted from the Registry. Neustar also performs random spot checks on .US registrations to affirm that WHOIS information is accurate. If, as a part of these checks, a registrant is found to be using privacy or proxy services, they are given 30 days to supply their correct information. If the privacy or proxy service is found to be provided by a .US registrar or reseller, Neustar will work directly with that party to ensure that the entity ceases to sell these services and that other affected registrations are updated. Neustar also runs an automated query to identify privacy or proxy protected registrations in .US. The results of such queries are reported in the Annual WHOIS Accuracy Report to the Department of Commerce.

In the past, law enforcement and copyright holders have viewed the restriction on privacy and proxy services as beneficial, allowing them to quickly find contact information for criminals operating on the internet or violating copyright or trademark laws. The WHOIS database can also provide consumers with contact information for corporations to pursue avenues of recourse similar to that which they would have for brick and mortar stores. However, privacy and proxy services can serve legitimate privacy purposes and can enhance accountability. ICANN commissioned a National Physical Laboratory (NPL) study<sup>1</sup> in September 2013 on privacy and proxy services abuse and found that:

*“When domains are registered with the intent of conducting illegal or harmful internet activities a range of different methods [other than privacy and proxy services] are used to avoid providing viable contact information.”*

And:

*“However, although many more domains registered for entirely lawful internet activities have viable telephone contact information recorded within the WHOIS system, a great percentage of them do not.”*

For example, in examining maliciously registered phishing domains, the NPL study found that 61.3% provided an invalid or missing phone number in WHOIS. Comparatively, 31% used privacy or proxy services. This suggests that the unavailability of privacy and proxy services may push registrants toward other forms of WHOIS abuse.

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<sup>1</sup> <https://gnso.icann.org/en/issues/whois/whois-proxy-abuse-study-18may10-en.pdf>

Moreover, ICANN's *Initial Report on the Privacy and Proxy Services Accreditation Issues Policy Development Process*<sup>2</sup> states that the WHOIS accuracy tools and reviews have generally found violations in which a privacy or proxy service is used to be very low. WHOIS accuracy checks, on the other hand, reveal a high number of registrations in which false WHOIS data is provided. This data supports the fact that registrants may be more inclined to provide their full and accurate contact information if their information is not published publicly on the internet for any general user to find and/or potentially exploit. Barring privacy protection for purposes of purported openness can come at the cost of deterring registrants, fostering other forms of WHOIS abuse, and exposing personal information that may put registrants at risk.

As noted, there are just over 1.7 million domains under management in the .US TLD, and Neustar is dedicated to growing this number. The prohibition on privacy and proxy services may be disproportionately affecting certain categories of registrants, thereby shifting the registrant composition of the .US TLD. Sixty percent of .US websites are registered to state governments, public school districts, county libraries, and colleges. Forty percent of .US domain websites belong to international corporations, global media publications, global nonprofit organizations, churches, sports teams, families, small businesses, blogs, home businesses, retail stores, social media messaging sites, and gaming sites – the demographic of registrants who are most likely to be affected by the existing prohibition on privacy and proxy services.

Since 2005, the TLD marketplace has become increasingly competitive with the maturation of some legacy TLDs as well as the introduction of more than 1000 new gTLDs. Most competitors to .US allow privacy and proxy services to a potential registration base that is increasingly aware of, and concerned about, identity theft and internet related attacks. Moreover, ICANN's GSNO Council endorsed an accreditation plan to permit privacy and proxy services within the Registrar Accreditation Agreement. As such, the time is ripe for the implementation of privacy services within the .US TLD.

## OBJECTIVES

Our objectives in proposing Neustar's .US registry-based PSP are to:

- Provide an authoritative, accurate, real-time private WHOIS database that is quickly and easily accessible in response to lawful requests from law enforcement; and
- Provide a seamless process to registrars that will incentivize them to offer .US domain names and privacy services to its registrants;

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<sup>2</sup> <https://whois.icann.org/en/file/initial-report-privacy-proxy-services-accreditation-issues-policy-development-process>



- Provide needed protection to .US registrants regardless of whether the registrant is commercial or non-commercial entity;
- Generate greater use of the .US domain space.

## KEY CONSIDERATIONS

Some of the key considerations that were taken into account in developing a plan for the implementation of a registry-based privacy service include:

1. **Law enforcement, rights holders and others:** The adopted plan must accommodate the legitimate needs of law enforcement, rights holders and others, to easily accessible and accurate contact information.
2. **Minimal Disruption to Registrar business model:** Neustar's proposed plan must not disrupt current retail practices or interfere with the registrar's relationship with the customer.
3. **Maintain Privacy of Registrant Data:** The proposed plan will maintain the privacy of the WHOIS data of any registrant who requests privacy services.
4. **Maintain effectiveness of current accuracy and nexus policies regarding check on WHOIS data:** Neustar must have access to the full and accurate WHOIS data to ensure ongoing accuracy and nexus checks will not be disrupted.

## THE .US REGISTRY-BASED PRIVACY SERVICE PLAN

### Neustar Recommendation:

Neustar proposes to offer a registry-based privacy wholesale solution which may be resold by registrars. By offering privacy services at the registry level, Neustar, as the registry manager, will maintain control of the centralized authoritative database of WHOIS information.

The privacy service, as proposed by Neustar, will be built into the registry software, compliant with all .US policy and security standards. When a registrant elects to use the privacy service, personally identifiable information about the registrant (name, ID, physical address, phone number) will not be visible when performing a query on the public WHOIS database and the email address will be masked and will map to the contacts actual email address. Neustar will build in a name/value pair in the Extensible Provisioning Protocol (EPP) between the registry and the registrars. Registrars who have agreed to amending their *usTLD Registrar Accreditation and Registry-Registrar Agreement*, updated their end user agreements, and relevant marketing materials, will merely need to indicate a "yes" or "no" value via EPP depending upon whether the .US

registrant elects to use the privacy service or not. If the value is no, the current processes will be followed and the registrant's contact information will be published in the WHOIS. If the value is yes, Neustar will retain the real data in the authoritative database and will insert anonymized data with a unique reference number in the public WHOIS database. Please see Appendix A for the current and proposed WHOIS responses.

This proposed approach satisfies all the objectives set forth by the .US stakeholders. By maintaining the centralized authoritative WHOIS database at the registry level, Neustar will be able to provide one-stop access to law enforcement agencies, rights holders, and others with lawful requests in near real time. By permitting registrants the comfort of having their personal information protected by the privacy service, the registrants are more likely to provide real, accurate data that can be relied upon by lawful requestors such as law enforcement.

### **Release of Information to Law Enforcement**

Neustar will cooperate with government and law enforcement officials and private parties to enforce and comply with the law and will therefore disclose information to such parties when required by law, to conform to the edicts of law, or to comply with legal process properly served on Neustar, to protect property rights of rights holders and to protect the safety of the public or any person, or to prevent or stop an illegal or unethical activity. To the extent we are legally permitted to do so, Neustar will take reasonable steps to notify registrants that we are required to provide the registrant's personal information to third parties as part of a legal process.

The proposed plan offers the least disruption to the registrars' retail business model. As stated above, once the initial adoption steps are completed, registrars will need only to input the yes or no response into the EPP. Registrars will be able to resell the privacy service, thereby providing an incentive to sell .US domains and include .US in its packaged value-added service products. Neustar will not have a relationship with the registrant different than it has today. The proposed plan maintains the fundamental purpose of the WHOIS, which is to provide the ability to look up certain information about a domain name and make contact with the registrant or administrators of a domain name.

Registrants will no longer reject a .US domain solely due to the inability to privatize their personal information. Under the proposed plan, the privacy option available to registrants for .US should satisfy registrant demand and the registry-based model will

not look any different to the registrant than the privacy services available for other competing TLDs.

By maintaining control over the centralized, real-time, authoritative database of WHOIS information, Neustar can continue to provide prompt and reliable queries and conduct WHOIS accuracy and nexus reviews and spot checks without interruption.

**Carve outs:**

The Council discussed, but did not come to a conclusion on, whether the .US PSP should include a carve out for commercial entities. The Council noted in its discussion the difficulty presented in identifying and applying such a carve out. The ICANN GNSO Working Group Final Report as adopted by GNSO Council states that:

The status of a registrant as a commercial organization, non-commercial organization, or individual should not be the driving factor in whether P/P services are available to the registrant. Fundamentally, P/P services should remain available to registrants irrespective of their status as commercial or non-commercial organizations or as individuals. Further, P/P registrations should not be limited to private individuals who use their domains for non-commercial purposes.

Neustar recommends that to reduce confusion in the application and enforcement of the policy, to protect legitimate concerns of home-based businesses, and to maintain a low cost of administration, the privacy service should be made available to all domain holders regardless of commercial status.

**Pricing**

Subject to approval of the plan and scoping of the service Neustar plans to price its privacy service at a nominal fee, such as \$0.50 per domain name per year, in order to recover its administrative costs while being low enough to allow registrars to resell the service for a profit comparable to other privacy and proxy services. Domain name retailers would be expected to adjust the final sales price according to their individual pricing policies. As such, retail prices may vary from retailer to retailer.

## POLICY & LEGAL UPDATES

### **Policy**

Based on preliminary reviews there are no other provisions within the published policies that would prevent the implementation of the .US registry-based privacy service plan as it is currently envisaged. Consideration will be given to the process of drafting, review, approval and socialization of such changes or new policy.

Education to minimize marketplace confusion will be important to ensure the Internet community understands the changes to WHOIS and any impact it may have on current practices and behavior.

### **Legal**

The .US Registry Based Privacy Service Plan has a primary dependency on the ability of the Agreement between the United States Department of Commerce and Neustar to be altered to allow for privacy services.

The Neustar Registry Legal teams and the contract/relationship managers will need to be engaged to manage this process based upon a favorable view of the .US Registry Based Privacy Service Plan. Consideration will be given to potential updates to the contract that may be required, and the negotiation process that follows.

Alongside the update to the contract, the usTLD Registrar Accreditation and Registry-Registrar Agreement may need certain amendments to reflect the desired implementation. Consideration will be given as to those amendments, the process by which the amendment is issued, and the timelines required for the amendments to take effect.

For both the updates to the Agreement between the United States Department of Commerce and Neustar and the usTLD Registrar Accreditation And Registry-Registrar Agreement, time estimates will be factored into the overall plan.

## APPENDIX A

### Current versus Proposed Public WHOIS Search Results

PUBLIC WHOIS RESULTS	CURRENT	PROPOSED
Domain Name	NEUSTAR.US	NEUSTAR.US
Domain ID	D670499-US	D670499-US
Sponsoring Registrar	REGISTRY REGISTRAR	REGISTRY REGISTRAR
Registrar URL (registration services)	WWW.NEUSTAR.US	WWW.NEUSTAR.US
Domain Status	clientDeleteProhibited	clientDeleteProhibited
Domain Status	clientTransferProhibited	clientTransferProhibited
Domain Status	serverDeleteProhibited	serverDeleteProhibited
Domain Status	serverTransferProhibited	serverTransferProhibited
Domain Status	serverUpdateProhibited	serverUpdateProhibited
Variant	NEUSTAR.US	NEUSTAR.US
Registrant ID	NEUSTAR7	Privacy Protected
Registrant Name	.US Registration Policy	Privacy Protected
Registrant Address1	46000 Center Oak Plaza	Privacy Protected
Registrant City	Sterling	Privacy Protected
Registrant State/Province	VA	Privacy Protected
Registrant Postal Code	20166	Privacy Protected
Registrant Country	United States	Privacy Protected
Registrant Country Code	US	Privacy Protected
Registrant Phone Number	+1.5714345728	Privacy Protected
Registrant Email	support.us@neustar.us	<a href="mailto:123abc@privateregistration.us">123abc@privateregistration.us</a>
Registrant Application Purpose	P5	P5
Registrant Nexus Category	C21	C21
Administrative Contact ID	NEUSTAR7	Privacy Protected
Administrative Contact Name	.US Registration Policy	Privacy Protected
Administrative Contact Address1	46000 Center Oak Plaza	Privacy Protected
Administrative Contact City	Sterling	Privacy Protected
Administrative Contact State/Province	VA	Privacy Protected
Administrative Contact Postal Code	20166	Privacy Protected
Administrative Contact Country	United States	Privacy Protected
Administrative Contact Country Code	US	Privacy Protected
Administrative Contact Phone Number	+1.5714345728	Privacy Protected
Administrative Contact Email	support.us@neustar.us	123abc@privateregistration.us
Administrative Application Purpose	P5	P5
Administrative Nexus Category	C21	C21
Billing Contact ID	NEUSTAR7	Privacy Protected
Billing Contact Name	.US Registration Policy	Privacy Protected
Billing Contact Address1	46000 Center Oak Plaza	Privacy Protected
Billing Contact City	Sterling	Privacy Protected
Billing Contact State/Province	VA	Privacy Protected
Billing Contact Postal Code	20166	Privacy Protected
Billing Contact Country	United States	Privacy Protected
Billing Contact Country Code	US	Privacy Protected
Billing Contact Phone Number	+1.5714345728	Privacy Protected
Billing Contact Email	support.us@neustar.us	123abc@privateregistration.us
Billing Application Purpose	P5	P5
Billing Nexus Category	C21	C21
Technical Contact ID	NEUSTAR7	Privacy Protected
Technical Contact Name	.US Registration Policy	Privacy Protected

Technical Contact Address1	46000 Center Oak Plaza	Privacy Protected
Technical Contact City	Sterling	Privacy Protected
Technical Contact State/Province	VA	Privacy Protected
Technical Contact Postal Code	20166	Privacy Protected
Technical Contact Country	United States	Privacy Protected
Technical Contact Country Code	US	Privacy Protected
Technical Contact Phone Number	+1.5714345728	Privacy Protected
Technical Contact Email	support.us@neustar.us	123abc@privateregistration.us
Technical Application Purpose	P5	P5
Technical Nexus Category	C21	C21
Name Server	PDNS1.ULTRADNS.NET	PDNS1.ULTRADNS.NET
Name Server	PDNS2.ULTRADNS.NET	PDNS2.ULTRADNS.NET
Name Server	PDNS3.ULTRADNS.ORG	PDNS3.ULTRADNS.ORG
Name Server	PDNS4.ULTRADNS.ORG	PDNS4.ULTRADNS.ORG
Name Server	PDNS5.ULTRADNS.INFO	PDNS5.ULTRADNS.INFO
Name Server	PDNS6.ULTRADNS.CO.UK	PDNS6.ULTRADNS.CO.UK
Created by Registrar	REGISTRY REGISTRAR	REGISTRY REGISTRAR
Last Updated by Registrar	BATCHCSR	BATCHCSR
Domain Registration Date	Thu Apr 18 19:21:55 GMT 2002	Thu Apr 18 19:21:55 GMT 2002
Domain Expiration Date	Mon Apr 17 23:59:59 GMT 2017	Mon Apr 17 23:59:59 GMT 2017
Domain Last Updated Date	Thu Jun 02 01:32:36 GMT 2016	Thu Jun 02 01:32:36 GMT 2016
DNSSEC	false	false



Neustar is a global corporation publicly traded on the New York Stock Exchange under the ticker symbol “NSR”. Headquartered in Sterling, Virginia, we have offices around the world provide services to over 14,000 customers around the globe – including more than half of all Fortune 500 companies.

Neustar has been at the forefront of the Domain Name Industry for over 15 years. As an early industry pioneer, Neustar has played an important role in the growth and evolution of nearly every aspect of the domain name space. Today, many of the world’s leading governments and top brands count on Neustar as a trusted Registry Operator to help them to establish, promote and protect their domains. What started in 2001 with just the .biz top-level domain has now grown to nearly 300 TLDs (both ccTLDs and gTLDs), supporting and running some of the most dynamic domain extensions on the Internet as a partner, provider and teammate.

Beyond world-class Registry Services, Neustar brings with us the strength of over 2,000 employees located in offices across the globe with experience across a broad range of complementary Security Services, Marketing Services, and Data Services. Our portfolio of products and services enables Neustar to radically expand the traditional notion of a ‘Registry Service Provider’ in a way that provides a uniquely powerful solution – and the ability to support the usTLD Registry contract in ways that go far and beyond the capacity of any other registry service provider on the planet.