



## Coalition for Online Accountability

[www.onlineaccountability.net](http://www.onlineaccountability.net)

April 5, 2021 (Part 2)

Dear .us Stakeholder Council and Secretariat and Registry Services LLC:

Earlier today, I submitted a letter from COA that contains a mistake that I would like to bring to the Council's attention. On page 5 of the letter I refer to Spamhaus' ranking of the United States as number 2 of "The 10 Worst Spam Countries." I had understood that to mean with respect to the relevant countries' ccTLDs. But that is not the case; rather it is an overall ranking of countries' control (or lack thereof) of spam. Therefore, the statement made at the bottom of page 5 of the earlier letter *"the .us ranking of second worst ccTLD for spam"* is incorrect.

Nevertheless, the Spamhaus analysis of .us as 9.8% bad (score 0.82) is still very troubling when compared to other ccTLDs. Not only does Denmark's .dk show just 0.1% bad, but so does Canada's .ca—0.1% bad (score 0.01). The United Kingdom's .uk comes in at 0.6% bad (score 0.04) and Germany's .de at 0.2% bad (score 0.01).<sup>1</sup> The fact that Spamhaus' sophisticated weighted percentage of "bad" domains for .us is nearly 100 times that of either .ca or .dk, and 16 times that of .uk, should be of grave concern not only to the Council, but to the United States government as well.

Therefore, the balance of COA's earlier letter, our responses to the questions posed by the Council concerning the Recommendation for allowing the use of Privacy or Proxy Services, and the urgent need for the .us TLD to take more action to curb abuse and illegal activity on the domain remain unchanged.

I would like to refer the Council to a January 2020 article from the Internet Policy Review entitled "The Regulation of Abusive Activity and Content: A Study of Registries' Terms of Service."<sup>2</sup> The article examines 30 European ccTLDs and examines the terms of service and WHOIS data accuracy practices that have been undertaken. The following passage provides useful guidance that the Council should embrace for the .us ccTLD:

*"Several registries have introduced internal or external data validation processes (e.g., <.dk>, <.uk>, <.eu>). The UK ccTLD-registry, Nominet, for example, uses a data validation process, where it matches*

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<sup>1</sup> All percentages and scores taken on April 5, 2021 from Spamhaus project site:


<https://www.spamhaus.org/statistics/tlds/>

<sup>2</sup> <https://policyreview.info/articles/analysis/regulation-abusive-activity-content-study-registries-terms-service>

*name and address against a third-party data source (Nominet, 2019). Similarly, the Belgian registry performs a daily manual screening of newly registered domain names, which is “carried out first and foremost to identify any obvious cases of phishing rapidly” (DNS Belgium, 2019). In Denmark, a problem with online shops selling counterfeit products was manifested by an increasing number of court orders that the registry received to seize <.dk> domains. In 2017, the Danish registry, DK Hostmaster, introduced the mandatory use of a common login and verification solution used by government, banks and other private actors for identity verification purposes of Danish registrants and a risk-based assessment of foreign registrants at the time of registration. The verification requirement resulted in a decrease of online shops suspected of IP infringements from 6,73% to 0,12% (DK Hostmaster, 2019). Also, the <.eu> registry, EURid, cross-checks registration data with third parties, which by 2016 had resulted in the deletion of 31,819 domains at the registry’s own initiative (EURid, 2016).”*

My apologies for the error in the earlier letter. Thank you for providing an opportunity to provide comments and COA would happily engage with the Council on these issues.

Sincerely,



**Dean S. Marks**  
**Executive Director and Legal Counsel**  
**Coalition for Online Accountability (“COA”)**  
**E-mail: [ed4coa@gmail.com](mailto:ed4coa@gmail.com)**