KnujOn March 2016: Internet Limbo

KnujOn Report Concerning Issues of Consumer Trust on the Internet as they apply to the Internet Corporation of Assigned Names and Numbers (ICANN), the ICANN Compliance Function, ICANN Registries, and ICANN Registrars. Any comments or questions should be sent to g_bruen@knujon.com.

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Abstract

This document discusses the availability, accessibility and utility of abuse or fraud complaint resources for Internet consumers along with related high-level abuse data. This is not an official statement from the ICANN At-Large Advisory Committee (ALAC), but it is rather done in the spirit of ALAC duty number 2: "*Keeping the community of individual Internet users informed about the significant news from ICANN.*" [1] We would like to think Internet governance is a shining city on hill, but it may be more like something which languishes in the depths Tartarus. In this report we begin from the outside-in, from the lost user perspective. Section 1 analyzes ICANN's current state and mission. Section 2 examines ICANN's website from the perspective of a user as to how its enforcement mechanisms deal with consumers. Section 3 details how the portions of the Internet under ICANN's management (registries and registrars) rate in terms of abuse. Section 4 provides some recommendations for improving the situation.

About the Author

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About KnujOn.com

KnujOn.com, LLC is an independent abuse handler and Internet security research organization based in Boston, Massachusetts. KnujOn processes abuse data in the form of spam and other security threats to develop a clear picture of problems facing the Internet. KnujOn builds profiles of online criminal groups, evaluates the quality of registrars and Internet Service Providers, issues WHOIS challenges, documents policy failures, develops policy initiatives, tests compliance mechanisms, issues reports to professional investigators, and educates the public about complex Internet security issues. We see our role as one of assisting the ordinary Internet user in navigating the dense technical bureaucracy of the global network and augmenting public services in the face of rampant illicit electronic traffic.

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[1] https://www.icann.org/resources/pages/governance/bylaws-en/#XI

[2] http://whois.knujon.com

1. Introduction: Limbo

Any Internet user faced with abuse or fraud, in trying to understand the the situation, finds themselves in a dark wood having wandered off the straight path. This savage and stubborn wilderness is easy to fall into. The netherworld is not simply close to the legitimate Internet, it is integrated. Even for those well-versed in Internet technology and policy, the journey is difficult. For ordinary Internet users there is little or no hope of getting abuses addressed without relentless effort, overcoming a sharp learning curve. For those attempting to climb out of the pit and understand The Internet Corporation of Assigned Names and Numbers' approach to abuse, the words they read are cruel.

Right now the entire Internet is in Limbo. The U.S. government announced the oversight transition of the Internet number function to the global stakeholder community on 14 March 2014. The format of this proposed governance is still being defined. The U.S. Commerce Department extended the transition period for another year because the work needed more time. Several of the proposals have been rejected already, but at ICANN55 Marrakech the work of the Cross Community Working Group is moving forward.

How ICANN impacts consumers

Websites are the consumer-facing portion of the Internet. Websites are *domain names* at their root. Domain names are the province of ICANN which is the manager of the Domain Name System (DNS). This makes ICANN the ultimate point of origin for any generic (gTLD) domain name, not only in terms of policy but also money since ICANN receives indirect fees for domain names and direct fees from the registrars who sponsor them. It is primarily domain name sales which fund ICANN. This, however, does not apply to Country-Code domains (ccTLDs) which are under the management of specific sovereign governments.

What are ICANN's obligations?

ICANN has a number of policies and obligations concerning their relationship with the Internet user. These include issues such as competition, consumer protection, security, stability and resiliency, malicious abuse issues, sovereignty concerns, and rights protection[3]

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[3] https://www.icann.org/resources/reviews/aoc/cct

The issue of great concern now is the transition of the Internet Assigned Numbers Authority[4] (IANA) function from the U.S. government to ICANN, which depending on who you talk to is either the most important thing that has ever happened, the worst thing that has ever happened, or merely a symbolic milestone. Regardless, stewardship of the Internet is a critical task and the Internet community is changed with developing the best proposal for the transfer. The transition proposal must have broad community support and address the following four principles: 1) Support and **enhance the multistakeholder** model; 2) Maintain the security, stability, and resiliency of the Internet DNS; 3) Meet the needs and expectations of the **global customers** and partners of the IANA services; 4) and, Maintain the openness of the Internet.[5] The specific portion of addressing the four items is a mandated process for Enhancing ICANN Accountability which is split into two parts:

Work Stream 1: focused on mechanisms enhancing ICANN accountability that must be in place or committed to within the time frame of the IANA Stewardship Transition;
Work Stream 2: focused on addressing accountability topics for which a timeline for developing solutions and full implementation may extend beyond the IANA Stewardship Transition.

The question asked in this paper is about whether ICANN has a comprehensive plan to address abuse and cybercrime, which falls into ICANN's mandate, in a way that reaches the ordinary consumer. How does the work being done now prepare it to earn the consumer trust? What does ICANN mean by invoking "consumer trust" and what does it really mean to the organization? Here we will try to be you guide through this nebulous underworld.

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[4] http://www.iana.org

[5] https://www.icann.org/stewardship-accountability

2. The Public Face of ICANN to the Consumer

The first public face of ICANN to the consumer is of course http://icann.org. Here we examine what an Internet consumer might encounter when attempting to understand how to deal with the negative aspects of the Domain Name System. We starts in the most outer circle and slowly moves to the center.

2.1. From Page One of ICANN's website

In reading this, try to forget any depth of experience you may have and imagine you are one of the millions around the globe connecting to the Internet for the first time. There are no clear statements or links at icann.org concerning Internet abuse, fraud, criminality, etc. The word "consumer" does not appear on the front page. So, we must hunt and click through links that appear relevant. Here, we detail the most promising links first.

2.1.1. **Get Started**: The first link which lists a number of "Beginner's Guides" which are focused on being directly involved in the ICANN community and not so much on consumer issues. These guides are comprehensive and well-written but do to address the issues were concerned with[6]. One may wonder why ICANN should provide a specific guide for consumers, but the fact is they have created specific guides for journalists[7] and various other parties.

2.1.2. **Public Responsibility**: This is a wonderful program but it is focused on *"respond(ing) to Community and Regional needs...designed to strengthen the multistakeholder model by addressing participation needs."*[8]

2.1.3. **Global Support:** Support sounds like a good term, but this only applies to contracted parties and the existing community[9], it is not support in the basic sense.

2.1.4. **Security Team**: ICANN has a great security team, but this refers to overall structural security and not that of end users[10]. Should ICANN provide security for the entire Internet? No, that is not the issue here.

2.1.5. **Accountability and Transparency**: The sub-links are examined below, but this is a high-level view of accountability and transparency. It does not provide either

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[6] https://www.icann.org/resources/pages/beginners-guides-2012-03-06-en

[7] https://www.icann.org/resources/pages/press-2014-03-17-en

[8] https://www.icann.org/development-and-public-responsibility

[9] https://www.icann.org/resources/pages/customer-support-2015-06-22-en

[10] https://www.icann.org/resources/pages/security-2012-02-25-en

accountability or transparency to the end user in a meaningful way, and we will explain why.

2.1.5.1. **Accountability Mechanisms**: This provides an overview of of the specific functions[11] but the summaries do not provide real utility for the consumer.

2.1.5.2. **Independent Review Process**: All of the process here concerns commercial parties directly involved in ICANN's business.[12]

2.1.5.3. **Request for Reconsideration**: This refers to parties already involved in ICANN's business who are dealing with a policy decision[13]. Again, not applicable to consumers.

2.1.4.4. **Ombudsman**: In the common sense an ombudsman is supposed to be an impartial arbitrator in an organization who handles complaints about the organization. This is again, further down the road from the perspective of the consumer. In general, the ICANN ombudsman has an inherent conflict of interest since the office is funded by ICANN and accountable to ICANN's board. Not the ideal situation. The actual function and results of the ombudsman will be analyzed in a future report and are troubling.

2.1.6. **Help**: Help! The simplest of words for someone with a problem. Below we detail how this help does not address consumer problems.

2.1.6.1. **Dispute Resolution**: A high-level view of different issues, mostly for commercial parties[14]. There is one link "Spam and Viruses" which we will examine below.

2.1.6.2. **Domain Name Dispute Resolution**: Concerns policies of trademarks and domains, not for ordinary consumers[15].

2.1.6.3. **Registrar Problems**: Here, we finally get some answers, but they are not good: "*ICANN does not address consumer complaints* [pertaining to spam and viruses]"[16]

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[11] https://www.icann.org/resources/pages/mechanisms-2014-03-20-en

[12] https://www.icann.org/resources/pages/accountability/irp-en

[13] https://www.icann.org/resources/pages/accountability/reconsideration-en

[14] https://www.icann.org/resources/pages/dispute-resolution-2012-02-25-en#spam

[15] https://www.icann.org/resources/pages/dndr-2012-02-25-en

[16] https://www.icann.org/news/announcement-2007-03-06-en

2.1.7. Using **Search**: Exhausted, the consumer might turn to the search function. Using the site search yields the most promising, yet eventually most disappointing results. We search for some of the most common terms that consumers might use: phishing, spam, abuse and virus. The results are examined below.

2.1.7.1. Phishing

Multiple documents returned include some critical incident reports, most importantly "About Phishing[17]" which will be discussed further. The document is two years old and directs consumers to file complaints with the U.S. Federal Trade Commission[18] (FTC) or the International Consumer Protection and Enforcement Network[19] (ICPEN). The links do not open a new window or tab but rather in the existing browser window which completely exits the user from ICANN's website. The FTC has a dedicated site for complains[20]. Both sites have complaint interfaces. ICPEN has referrals to specific national consumer agencies (clicking on the U.S. brings the user back to the FTC). However, these sites are not evaluated here for their utility or effect. We are focused on what ICANN does for the consumer.

2.1.7.2. Spam

Multiple documents, two in particular: "About Whois for Spam Complaints[21]" and "About Spam, Phishing & Website Content[22]" All of the pages carry the proviso "*Complaints about [malware, spam, phishing, viruses, content] are outside of ICANN's scope and authority*". The page is also available in Arabic[23], Spanish[24], French[25], Russian[26] and Chinese[27]. These translations also point to the FTC website which is problematic. The

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[17] https://www.icann.org/resources/pages/phishing-2013-05-03-en

[18] https://www.ftc.gov

[19] https://icpen.org

[20] https://www.ftccomplaintassistant.gov/#crnt&panel1-1

[21] https://www.icann.org/resources/pages/spam-2013-03-22-en

[22] https://www.icann.org/resources/pages/web-2013-05-03-en

[23] https://www.icann.org/resources/pages/spam-2013-03-22-ar

[24] https://www.icann.org/resources/pages/spam-2013-03-22-es

[25] https://www.icann.org/resources/pages/spam-2013-03-22-fr

[26] https://www.icann.org/resources/pages/spam-2013-03-22-ru

[27] https://www.icann.org/resources/pages/spam-2013-03-22-zh

FTC website is <u>not</u> available in these languages and the FTC mainly accepts complaints from Americans only. The links: *Learn More* and *Take Action* lead to the same content. Most unfortunate is the rather promising result entitled: "*How can I help protect myself from spam, phishing and other Internet fraud?*" What does the consumer find at this link[28]?

QUESTION #20: How can I help protect myself from spam, phishing and other Internet fraud?

🔒 Lecture contents locked

Enroll in Course to Unlock

It is not helpful to hide information which might benefit the Internet consumer. It may be a useful course, but this is not a direct to consumer approach.

2.1.7.3. Abuse

The first two pages that appear direct the user to IANA's website. There are very specific documents here about the structure of Internet Protocol addresses[29] (IP). IPs are behind domains, but they are not domains, they are the underlying portion of the DNS. The IANA documents go to lengths to instruct Internet users to look somewhere else for handling abuse issues[30].

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[28] http://learn.icann.org/courses/the-beginner-s-guide-to-domain-names/lectures/621022

[29] https://www.iana.org/help/abuse-answers

[30] https://www.iana.org/abuse

In summary, there is a lack of direct communication to the consumer or Internet end user. Specific attempts to address Internet abuse lead to a direct "no" or a redirection to an external source. The next document in the search results is entitled "*Update On Steps To Combat Abuse And Illegal Activity*" [31], a blog which will be discussed in section 2.2. Another search result is called "*Abuse Contact Data Complaint Form*"[32] which is a useful form, but it does not directly relate to end-user complaints about abuse, but rather a lack of abuse contact information published by a specific registrar. This would be useful *after* the user attempts and fails to contact the registrar. However, since this process is not linked, spelled out, or mandated it would be unlikely most Internet users would even get to this point. The next search result "*Registrar Abuse Reports*" [33] actually has a good explanation of the requirement for registrars to have published abuse contact information and is linked to the Abuse Contact Data Complaint Form.[34] Unfortunately, since this information is not directly linked from the topic pages on Spam, Phishing, and Malware, it is unlikely the Internet user would get to this level.

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[31] https://www.icann.org/news/blog/update-on-steps-to-combat-abuse-and-illegal-activity

[32] https://forms.icann.org/en/resources/compliance/complaints/registrars/standards-complaint-form

[33] https://www.icann.org/resources/pages/abuse-2014-01-29-en

[34] https://forms.icann.org/en/resources/compliance/registries/abuse-contact/form

2.2. From the Horse's Mouth

Domains are at the root of websites and email addresses. Domains are obtained through registrars with ICANN contracts. The contracts of registrars contain specific conditions and the sponsorship obligations of a domain owner are also stated. This makes the various types of abuses of domain names the duty of ICANN's contractual compliance department. Most Internet users would only know this if they simply read the preceding explanation. Contractual compliance is a concept completely foreign to most consumers and they would have no realization that the function of ICANN's compliance area directly impacts their safe use of the Internet. This is the first hurdle any victimized Internet user must overcome. In order to properly access domain-based abuse they must know that it is an issue of contractual compliance.

2.2.1. ICANN Compliance and Consumer Trust

The stated vision and mission of ICANN Compliance is to be a *trusted Contractual Compliance service provider by preserving the security, stability and resiliency of the Domain Name System and promoting consumer trust*[35]. The "consumer trust" part is directly from the ICANN Affirmation of Commitments[36] and a requirement for a valid IANA stewardship transition. However, statements issued by ICANN Compliance (as well as its general actions) disregard the stated mission. Specifically, Compliance issued three blogs in 2015 (detailed below and editorialized) which appear, by their nature to completely contradict ICANN's mission and mandate. ICANN has documented policies concerning "*abusive registrations of domain names*"[37] and require registrants to "*not knowingly use the domain name in violation of any applicable laws or regulations*"[38]. It would seem that anyone part of a such an agreement would be held to it, but the realities at ICANN are more complex.

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[35] https://www.icann.org/en/system/files/files/contractual-compliance-complaint-03sep15-en.pdf

[36] https://www.icann.org/resources/pages/affirmation-of-commitments-2009-09-30-en

[37] https://www.icann.org/resources/pages/help/dndr/udrp-en

[38] https://www.icann.org/resources/pages/policy-2012-02-25-en

2.2.2. Blog 1: "*Community Outreach On Interpretation and Enforcement of the 2013 RAA*"[39]

This inaugural announcement, by its virtue, is directive and not consensus based. The invocation of the word "interpretation" places all of the control concerning DNS enforcement in the hands of one department and ultimately one person. To compound this issue, ICANN Compliance has historically refused to answer questions about their process which makes it difficult if not possible to audit. The only document consumers might find describing a process is called *Compliance Process and Approach*[40] but it only applies to issues ICANN compliance takes on as formal matter, it does not show how complaints from consumers get to this level, and in fact there is no real path. The reason often cited is that open discussion of the Compliance process would *jeopardize the relationship with contracted parties*, which clearly trumps consumer trust, accountability, and transparency. ICANN policy is supposed to be consensus-driven. In this blog, the compliance director sets out to address four issues: 1) Forwarding abuse reports to the registered name holder; 2) Whether there are any circumstances in which not forwarding an abuse report to the registered name holder is justified; 3) How a registrar should respond if the registered name holder ignores the abuse report and fails to respond; 4) What should be communicated back to the party that filed the abuse report. This seems reasonable on the surface, but the details make it problematic. This blog is more of a blueprint for rejecting complaints, as do the next two blogs. The title of the blog also mentions outreach, but Compliance Outreach only refers to the regular constituency groups at ICANN like the Intellectual Property holders and the registrars themselves. Outreach is not targeting Internet consumers and did not meet with the At-Large stakeholders.

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[39] https://www.icann.org/news/blog/community-outreach-on-interpretation-and-enforcement-of-the-2013-raa

[40] https://www.icann.org/resources/pages/approach-processes-2012-02-25-en

2.2.3. Blog 2: "*ICANN Is Not the Internet Content Police*"[41]

> *Yesterday, I published a blog informing the community about efforts I am making to offer greater clarity regarding ICANN's interpretation and enforcement of certain key provisions of the 2013 RAA*[42]

A brief reading of this statement reveals serious issues. The clear reading of the statement shows pains taken by compliance to explain a position, and not a blog about what they are doing to enforce policy. A contract created in consultation with by the global multi-stakeholder community should not be subject to the interpretation of a single person. The compliance director does not own the relationship between ICANN and the world's Internet users, it is not his to bargain with and dispose with at will. The illegal activity in question here concerns the fraudulent representation which occurs *inside* of contractual activity. The clear goal of the blog is to highlight things which reasonable people would not saddle ICANN with while ignoring long-term failures of ICANN to properly vet and police their commercial agents within the contractual authority. This blog is a distraction move, an attempt to push any responsibility outside of ICANN. By the compliance director using "interpretation" of the contract it is possible to push any problem outside of ICANN's remit without any opportunity to question.

What is at the core of this effort? It boils down to two points in the blog, that enforcement would either be A) "*effectively putting the website out of business*"[43] and/or B) "*effectively putting the registrar out of business.*"[44] This is the summary of ICANN's problem, registrants and registrars provide income to ICANN therefore enforcing the rules is a disincentive to profit. This is not a multi-stakeholder policy for a non-profit organization.

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[41] https://www.icann.org/news/blog/icann-is-not-the-internet-content-police

[42] https://www.icann.org/news/blog/icann-is-not-the-internet-content-police

[43] https://www.icann.org/news/blog/icann-is-not-the-internet-content-police

[44] https://www.icann.org/news/blog/icann-is-not-the-internet-content-police

2.2.4. Blog 3: "*Update On Steps To Combat Abuse And Illegal Activity*"[45]

The third compliance blog[46] appears to be a direct criticism of Internet abuse reporters. The compliance director launches this criticism of Internet users:

> *Registrars also receive complaints on occasion that have been generated by automated programs. Sometimes a registrar will receive the identical complaint from an automated program multiple times on the same day or over the course of a week.*[47]

There is no attempt here to explain why this might be the case. Spam containing the same domain names are sent to thousands if not millions of Internet users. Malware impacts users and servers on a massive scale. If there are multiple complaints about a site, would it not be a good idea to further examine the data instead of rejecting it?

> *Sometimes a complaining party who is dissatisfied with a registrar's response to a complaint keeps submitting the identical complaint over and over again.*

There is a failure here to provide guidance to complaining parties or explain track which registrars have a pattern of rejecting complaints from Internet users. There are seven requirements for complaint submitters and four reasonable steps for registrars in response to the complaints. Following the apparent logic in all of this it seems that if A) the complaint in question is not about something illegal the registrar is not obligated to do anything; if B) the issue is not illegal in the registrar's jurisdiction the registrar is not obligated to do anything; and if C) it is illegal in registrar's jurisdiction the user should be reporting it to law enforcement and not the registrar.

The biggest failure here is that ICANN has taken itself out of the information flow - this is completely between a user and a registrar. There is a missed opportunity for ICANN to collect meaningful statistics on the nature of complaints and the parties involved. There is no way here for ICANN to become aware of consumer abuse and hence develop new strategies for combatting abuse and illegal activity.
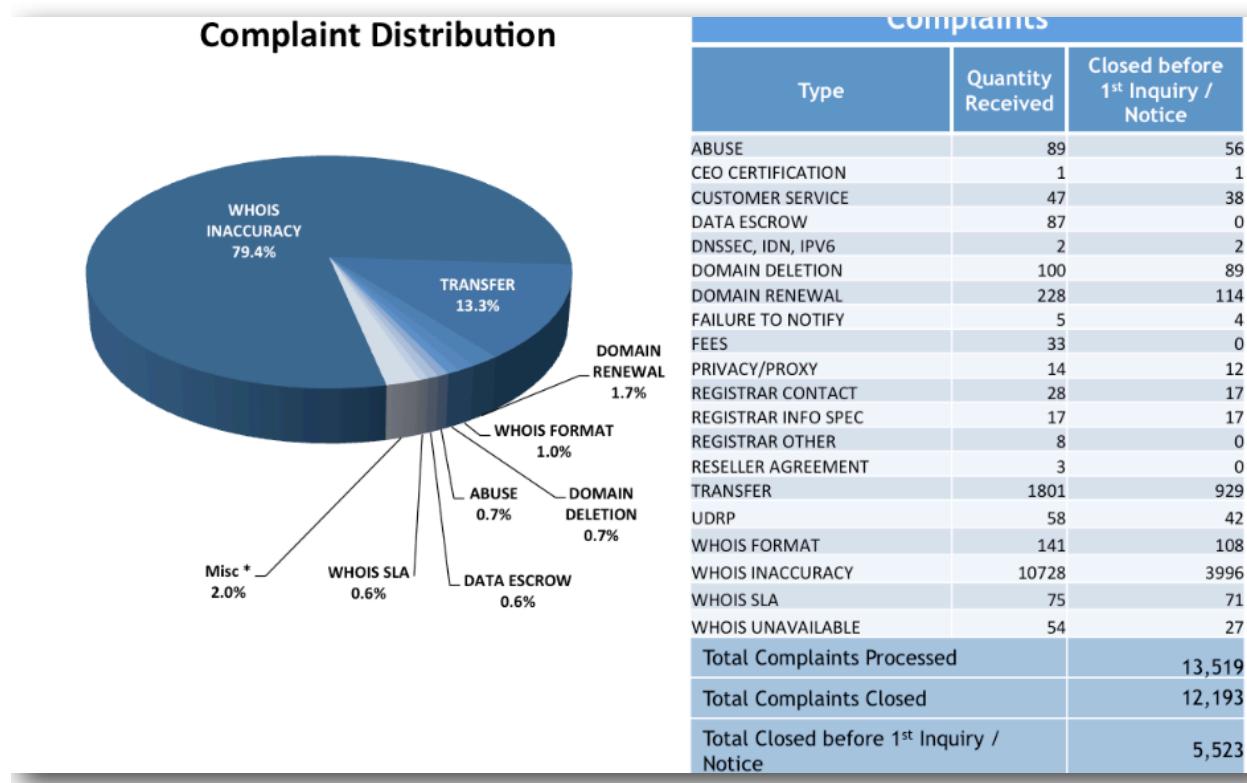
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[45] https://www.icann.org/news/blog/update-on-steps-to-combat-abuse-and-illegal-activity

[46] https://www.icann.org/news/blog/update-on-steps-to-combat-abuse-and-illegal-activity

[47] https://www.icann.org/news/blog/update-on-steps-to-combat-abuse-and-illegal-activity

2.2.5. Blogs Do Not Reflect Real Compliance Data

The three blogs issued by the head of compliance (detailed above) go to pains to describe the problems associated with *invalid* abuse complaints. The blogs explain that ICANN is not the content police, that ICANN cannot tackle issues of blasphemy, hate speech or pornography. The blogs have been the source of much discussion and debate with ICANN CEO Fadi Chehade referring to them frequently. The constant drumbeat is that ICANN cannot act on these abuse complaints. The attention leads one to believe that compliance is overwhelmed by invalid abuse complaints that are out of scope. However, compliance quarterly reports tell a different story. According to the most recent quarterly report 96.7% of the compliance complaints are for contractual matters[48] (mostly WHOIS inaccuracy and domain transfer issue). Only 0.7% of the complaints are for "abuse". (below chart is from compliance report[49])

Complaint Distribution

Type	Quantity Received	Closed before 1st Inquiry / Notice
ABUSE	89	56
CEO CERTIFICATION	1	1
CUSTOMER SERVICE	47	38
DATA ESCROW	87	0
DNSSEC, IDN, IPV6	2	2
DOMAIN DELETION	100	89
DOMAIN RENEWAL	228	114
FAILURE TO NOTIFY	5	4
FEES	33	0
PRIVACY/PROXY	14	12
REGISTRAR CONTACT	28	17
REGISTRAR INFO SPEC	17	17
REGISTRAR OTHER	8	0
RESELLER AGREEMENT	3	0
TRANSFER	1801	929
UDRP	58	42
WHOIS FORMAT	141	108
WHOIS INACCURACY	10728	3996
WHOIS SLA	75	71
WHOIS UNAVAILABLE	54	27
Total Complaints Processed		13,519
Total Complaints Closed		12,193
Total Closed before 1st Inquiry / Notice		5,523

Pie chart labels: WHOIS INACCURACY 79.4%, TRANSFER 13.3%, DOMAIN RENEWAL 1.7%, WHOIS FORMAT 1.0%, ABUSE 0.7%, DOMAIN DELETION 0.7%, DATA ESCROW 0.6%, WHOIS SLA 0.6%, Misc * 2.0%

The first quarter report has more or less the same distribution with only slight fluctuation in the counts[50]. So, why so much focus on an issue which does not appear to amount

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48 https://www.icann.org/en/system/files/files/compliance-update-jun15-en.pdf

49 https://www.icann.org/en/system/files/files/compliance-update-jun15-en.pdf

50 https://www.icann.org/en/system/files/files/compliance-update-mar15-en.pdf

for much? It would seem that the public flogging of the community for submitting "invalid abuse complaints" is uncalled for.

2.2.6. Direct Questions for Compliance

At ICANN's 54th meeting this author had the opportunity to engage with the compliance director in a recorded session[51]. The questions were intended to define how the issue of Consumer Trust is being engendered within the organization's critical functions.

The first question was not intended to be controversial (on Consumer Trust on ICANN's Website), rather it was meant for ICANN to explain how it *engages* consumers through its website. The exchange that followed was unexpected and disappointing.

> **Bruen**: ...consumer trust is a huge issue and part of your mission statement. Have you developed a consumer-centric space on ICANN's website?
>
> **Grogan**: ICANN's mission is really the coordination of the number system for the Internet - this is what most of our resources are devoted to...we're not focused on content and commerce...we have not created in compliance a consumer-centric space.
>
> **Bruen**: Do you disagree that consumer-trust is part of your department's mission statement?
>
> **Grogan**: I'm talking about what ICANN's overall fundamental remit is.
>
> **Bruen:** Is [consumer trust] part of the Affirmation of Commitments?
>
> **Gorgan**: It's mentioned
>
> **Bruen**: Is consumer trust part of the IANA transition requirements?
>
> **Grogan**: I am not part of that process so I don't want to speak to it.
>
> **Bruen**: But can you speak to [consumer trust] being part of your department's mission statement?
>
> **Grogan**: It's not part our mission statement as a department as far I am aware.[52]

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[51] https://meetings.icann.org/en/dublin54/schedule/mon-naralo/ac-naralo-19oct15-en

[52] https://meetings.icann.org/en/dublin54/schedule/mon-naralo/transcript-naralo-19oct15-en

This entire dialogue is distressing since it seems to reject ICANN's core principles in practice. Consumer trust is not merely *mentioned* in the Affirmation of Commitments, it is one of the main tenets. The title of section 9.3 is *"Promoting competition, **consumer trust**, and consumer choice"*[53]. This section is in essence the embodiment of the commitment of ICANN. In specific detail the section defines the promotion of consumer trust as including "consumer protection" and "malicious abuse issues". The document in particular details the requirements of ICANN to develop WHOIS policy that promotes consumer trust. In particular reference to the Grogan response, the following is the ICANN Compliance mission statement[54]:

Contractual Compliance
Contracts are enforced through Contractual Compliance. The mission is to preserve the security, stability and resiliency of the Domain Name System and to promote consumer trust through prevention, transparency and enforcement.

As part of his answer in addressing consumers on ICANN's website, Grogan pointed to a new video which was reviewed after the session. The video is not geared towards Internet consumers, the video is for domain *registrants* experiencing transfer issues. The video is important and well-produced but has little to do with Internet users.

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[53] https://www.icann.org/resources/pages/affirmation-of-commitments-2009-09-30-en

[54] https://www.icann.org/en/system/files/files/contractual-compliance-complaint-03sep15-en.pdf

What follows are questions about compliance consulting with consumer groups:

> **Bruen**: Have you ever met with the Better Business Bureau in the United States?

> **Grogan**: Personally no.

> **Bruen**: Have you ever met with the Canadian Consumers Union?

> **Grogan**: No[55]

In trying to ascertain who ICANN Compliance met with, Grogran then names FDA which is a U.S. government agency and the MPAA which is a media industry group. The next question concerned ICANN staff assignments for Consumer Safeguards

> **Bruen**: How many staff the 25 compliance staff members are focused on consumer issues?

> **Grogan:** There's not a single staff member that's solely committed to that.[56]

The last statement turned out to be extremely problematic, because one year prior to this meeting ICANN announced the creation of a Consumer Safeguard Director:

> *A newly created position of Consumer Safeguards Director will also report to Grogan, and will focus specifically on implementation of those ICANN contract safeguards directed toward protecting consumers.[57]*

However, there is no such staff person at ICANN and to our knowledge ICANN has not posted a job opening for such a position[58].

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[55] https://meetings.icann.org/en/dublin54/schedule/mon-naralo/transcript-naralo-19oct15-en

[56] https://meetings.icann.org/en/dublin54/schedule/mon-naralo/transcript-naralo-19oct15-en

[57] https://www.icann.org/news/announcement-2014-10-12-en

[58] https://icann-openhire.silkroad.com/epostings/index.cfm?fuseaction=app.allpositions&company_id=16025&version=1

2.2.7. Results

The data and discussions above lead to an official letter from the ICANN At-Large Advisory Council to ICANN's CEO and Board of directors[59]. Issued in December 2015, this letter requests clarification on 1) the status of the hiring of a Consumer Safeguard Director, 2) ICANN's philosophy on Consumer Trust, and 3) outreach to the greater community on issues of Consumer Trust. The ICANN CEO replied quickly[60] restating the commitment to hiring a Consumer Safeguard director, embracing the philosophy of Consumer Trust and engaging the community in its development. The letter specifically states a new Consumer Safeguard should be hired by the ICANN55 meeting in March 2016. As of this publishing, we have received no further information from ICANN on this appointment.

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[59] https://www.icann.org/en/system/files/correspondence/greenberg-to-chehade-02dec15-en.pdf

[60] https://www.icann.org/en/system/files/correspondence/chehade-to-greenberg-21dec15-en.pdf

3. The Data: Registries and Registrars

The previous section details how the Internet end user might interact with ICANN if they had problem, but most users do not know what ICANN is. The next layer of user interaction concerns Registries and Registrars. Registries sponsor top-level domain extensions (TLDs) and registrars sponsor specific domain names. Both entities are accredited by ICANN. Registries manage what is to the *right* of the dot (e.g. .com, .edu, .net, etc.), registry *customers,* as it were*,* are the registrars. Registrars manage what is to the *left* of the dot (e.g. yahoo.com, amazon.com, etc.). A website is built upon a domain name which is obtained from a registrar. The registrar places the domain name in the Domain Name System through a registry. Registries and Registrars are listed in the next two sections based on the *rate* of abuse reported to Knujon, in the last six months, by thousands of Internet users who submit spam samples and report domain-based malware attacks.

3.1. gTLD Registry Data

Roughly 500 of the gTLDs are empty or virtually empty. Some of these are not yet launched, some are closed or have extreme restrictions (this number does not include ccTLDs). The 25 TLDs below have particular abuse issues. The remaining 400 plus TLDs all have some level of abuse but it does not reach the same level of seriousness as exhibited by the 25 listed here. Only four (4) of the TLDs with high rates of abuse are *legacy* TLDs and not *new* gTLDs. The legacy TLDs with abuse issues are mostly there due to general *volume* of registrations; these particular TLDs have overall *lower* percentages of abused domains as compared to the abused new gTLDs. The general trend is that certain new gTLDs are rapidly replacing exiting registries for spam and abuse. It is important to note that 10 of these abused TLDs are sponsored by a single company: Famous Four Media. The TLDs rated below all have scores *lower* than 50 which indicates problems with spam and abuse. Details were sent directly to the registries before this report was released. For each TLD the registrars with the most abused sponsored domains are shown. If one registrar has the overwhelming percentage, only that registrar is shown in **bold**; registrars marked with an * are also recorded here as one of the most reported registrars for abuse in section 3.2. Parties marked with a ✛ responded to us prior to publishing. Parties marked with a ▰ responded in an automated method or were non-committal. Registrars with less than 5% of the domains are generally not shown but available upon request.

3.1.1. **.download** (Score: 11)

dot Support Limited (Famous Four Media)
2nd Floor Leisure Island Business Centre, Ocean Village, Gibraltar, GX11 1AA
Gibraltar. registry@famousfourmedia.com, +350 21650000

99.84% of the reported spammed .download domains were registered through **Alpnames Limited***

3.1.2. **.work** (Score: 12) ✢

Top Level Domain Holdings Limited (Minds + Machines Ltd)
Craigmuir Chambers, Road Town Tortola VG 1110, British
Virgin Islands, support@mm-registry.com, +353.14301689

Three registrars sponsor the bulk of reported .work domains:
eNom Inc*: 56.14%
PDR Ltd.*: 24.88%
Instra Corporation Pty Ltd.: 13.98%

3.1.3. **.review** (Score: 15)

dot Review Limited (Famous Four Media)
2nd Floor Leisure Island Business Centre, Ocean Village, Gibraltar, GX11 1AA
Gibraltar. registry@famousfourmedia.com, +350 21650000

91.73% of the reported spammed .review domains were registered through A**lpnames Limited***

3.1.4. **.science** (Score: 16)

dot Science Limited (Famous Four Media)
2nd Floor Leisure Island Business Centre, Ocean Village, Gibraltar, GX11 1AA
Gibraltar. registry@famousfourmedia.com, +350 21650000

Four registrars sponsor the bulk of reported .science domains:
PDR Ltd.*: 37.81%
NameCheap Inc.*: 28.57%
Alpnames Limited*: 13.24%
Key-Systems LLC: 8.38%

3.1.5. **.link** (Score: 17)
Uniregistry, Corp.
Governors Square, Unit 3-110, 23 Lime Tree Bay Avenue, Grand Cayman, Cayman Islands, PO Box 1361, George Town, KY1-1108, Cayman Islands, contact@uniregistry.com, +1.3457496263

Two registrars sponsor the bulk of reported .link domains
eNom Inc.*: 67.81%
NameCheap Inc.*: 17.04%

3.1.6. **.top** (Score: 19) ✠
Jiangsu Bangning Science & Technology Co.,Ltd.
3th Floor, BangNing Technology Park, 2 YuHua Avenue, Yuhuatai District, Nanjing City, Jiangsu Province. China, newgtld@55hl.com, +86 13915996396

94.57% of the reported spammed .top domains were registered through **Alpnames Limited***

3.1.7. **.date** (Score: 19)
dot Date Limited (Famous Four Media)
2nd Floor Leisure Island Business Centre, Ocean Village, Gibraltar, GX11 1AA Gibraltar

95.05% of the reported spammed .date domains were registered through **Alpnames Limited***

3.1.8. .**faith** (Score: 20)
dot Faith Limited (Famous Four Media)
2nd Floor Leisure Island Business Centre, Ocean Village, Gibraltar, GX11 1AA Gibraltar

92.06% of the reported spammed .faith domains were registered through **Alpnames Limited***

3.1.9. **.asia** (Score: 23) - Legacy/Sponsored ✛
DotAsia Organisation Ltd., 12/F, Daily House, 35-37 Haiphong Road, Tsim Sha Tsui, Kowloon, Hong Kong, admin@iana.whois.asia, +852 2244 7900

Three registrars sponsor the bulk of reported .asia domains
BigRock Solutions Ltd.*: 66.16%
GMO Internet, Inc.: 18.61%
PDR Ltd.*: 12.17%

3.1.10. **.win** (Score: 24)
First Registry Limited (Famous Four Media)
2nd Floor Leisure Island Business Centre, Ocean Village, Gibraltar, GX11 1AA
Gibraltar

96.99% of the reported spammed .win domains were registered through **Alpnames Limited***

3.1.11. **.com** (Score: 25) - Legacy ⚑
VeriSign Global Registry Services
12061 Bluemont Way, Reston Virginia 20190, United States, info@verisign-grs.com, +1 703 925-6999

Four registrars sponsor the bulk of reported .com domains
eNom Inc.*: 41.39%
GoDaddy.com LLC: 23.38%
Network Solutions LLC: 5.57%
PDR Ltd.*: 5.19%

3.1.12. **.info** (Score: 25) - Legacy
Afilias Limited
Office 107, 3013 Lake Drive, CityWest, Dublin 24, Ireland, domainadmin@afilias.info, +1 215 706 5700

Four registrars sponsor the bulk of reported .info domains
GoDaddy.com LLC: 47.64%
CSL Computer Service Langenbach GmbH: 10.04%
Wild West Domains LLC: 9.03%
eNom Inc.*: 5.34%

3.1.13. **.biz** (Score: 25) - Legacy
Neustar, Inc.
Loudoun Tech Center, 46000 Center Oak Plaza, Sterling Virginia 20166, United States, registrytechnical2@neustar.biz, +1 571 434 5487

Five registrars sponsor the bulk of reported .biz domains
PDR Ltd.*: 35.37%
eNom Inc.*: 30.27%
BigRock Solutions Ltd.*: 10.34%
NameCheap Inc.*: 6.17%
GoDaddy.com LLC: 5.74%

3.1.14. **.xyz** (Score: 25) ✛
XYZ.COM LLC
2121 E Tropicana Ave, Las Vegas, NV 89119, United States, hello@xyz.com, +1.7027632191

Two registrars sponsor the bulk of reported .xyz domains
NameCheap Inc.*: 82.34%
PDR Ltd.*: 8.85%

3.1.15. **.net** (Score: 28) - Legacy ⚑
VeriSign Global Registry Services
12061 Bluemont Way, Reston Virginia 20190, United States, info@verisign-grs.com, +1 703 925-6999

Five registrars sponsor the bulk of reported .net domains
eNom Inc.*: 28.05%
GoDaddy.com LLC: 16.47%
PDR Ltd.*: 8.31%
Name.com Inc.*: 5.22%
Internet.bs Corp*.: 5.13%

3.1.16. **.org** (Score: 32) - Legacy
Public Interest Registry (PIR)
1775 Wiehle Avenue, Suite 102A, Reston Virginia 20190, United States,
mcoon@pir.org, +1 703 889 5762

Four registrars sponsor the bulk of reported .org domains
PDR Ltd.*: 22.91%
GoDaddy.com LLC: 22.82%
eNom Inc.*: 20.48%
Network Solutions LLC: 9.73%

3.1.17. **.rocks** (Score: 32)
United TLD Holdco, LTD.
One Clarendon Row, Dublin 2, Co. Dublin, Ireland, jeff@unitedtld.com, +1 425 298 2607

99.58% of the reported spammed .rocks domains were registered through **eNom Inc.***

3.1.18. **.party** (Score: 34)
Blue Sky Registry Limited (Famous Four Media)
2nd Floor, Leisure Island Business Centre, Ocean Village, Gibraltar, GX11 1AA,
Gibraltar, registry@famousfourmedia.com, 0035021650000

93.81% of the reported spammed .party domains were registered through **Alpnames Limited***

3.1.19. **.cricket** (Score: 35)
dot Cricket Limited (Famous Four Media)
2nd Floor Leisure Island Business Centre, Ocean Village, Gibraltar, GX11 1AA,
Gibraltar, registry@famousfourmedia.com, 0035021650000

Three registrars sponsor the bulk of reported .cricket domains
PDR Ltd.*: 81.40%
Alpnames Limited*: 12.94%
Key-Systems LLC: 5.67%

3.1.20. **.trade** (Score: 35)
Elite Registry Limited (Famous Four Media)
2nd Floor, Leisure Island Business Centre, Ocean Village, Gibraltar, GX11 1AA
Gibraltar, registry@famousfourmedia.com, 0035021650000

Two registrars sponsor the bulk of reported .trade domains
Alpnames Limited*: 75.61%
Alibaba Cloud Computing Ltd.: 21.95%

3.1.21. **.space** (Score: 37) ✛
DotSpace Inc.
Directiplex, Next to Andheri Subway, Old Nagardas Road, Andheri (East), Mumbai,
Maharashtra, 400069, India, admin@radixregistry.com, +1.4154494774x8522

Four registrars sponsor the bulk of reported .space domains
PDR Ltd.*: 37.81%
NameCheap Inc.*: 28.57%
Alpnames Limited*: 13.24%
Key-Systems LLC: 8.38%

3.1.22. **.click** (Score: 40)
Uniregistry, Corp.
Governors Square, Unit 3-110, 23 Lime Tree Bay Avenue, Grand Cayman, Cayman
Islands, PO Box 1361, George Town, KY1-1108, Cayman Islands,
contact@uniregistry.com, +1.3457496263

Four registrars sponsor the bulk of reported .click domains
GMO Internet, Inc.: 28.54%
eNom Inc.*: 25.42%
PDR Ltd.*: 23.40%
Uniregistrar Corp: 16.41%

3.1.23. **.webcam** (Score: 40)
dot Webcam Limited (Famous Four Media)
2nd Floor, Leisure Island Business Centre, Ocean Village, Gibraltar, GX11 1AA,
Gibraltar, registry@famousfourmedia.com, 0035021650000

95.01% of the reported spammed .webcam domains were registered through
Alpnames Limited*

3.1.24. **.help** (Score: 40)
Uniregistry, Corp.
Governors Square, Unit 3-110, 23 Lime Tree Bay Avenue, Grand Cayman, Cayman
Islands, PO Box 1361, George Town, KY1-1108, Cayman Islands,
contact@uniregistry.com, +1.3457496263

99.87% of the reported spammed .help domains were registered through **Uniregistrar Corp**

3.1.25. **.club** (Score: 42)
.CLUB DOMAINS, LLC
1640 West Oakland Park, Blvd 304, Oakland Park, Florida 33311, United States,
howard@dotclub.com, (954) 530-2580

Three registrars sponsor the bulk of reported .club domains
PDR Ltd.*: 59.60%
NameCheap Inc.*: 27.20%
eNom Inc.*: 7.40%

3.2. Registrar Data

All registrars with reported abuse have been scored, but not all abuse rates raise a level of concern. Many registrars have manageable situations and are proactive. Scores closer to zero indicate serious issues. The factors for scoring are varied but include the number of abused domains in contrast to the registrar's portfolio, the number of reported instances, and many other data points. 12 registrars with scores *below* 100 are listed here with details of the administrators with the most reported abused domains. These details were forwarded to each registrar prior to publishing.

3.2.1. Alpnames Limited (Score: 27) ✛
Alpnames Limited, Suite 3, 2nd floor, Montarik House, 3 Bedlam Court, Gibraltar GX11, 1AA, Gibraltar, +442031379682, db@alpnames.com

Below is a list of the top 100 domains administrators reported for abuse.

admin (Alpnames)	reported domains
fbrightsolutions@gmail.com	1534
baifratdomain@gmail.com	1361
admin@growtune.work	1323
wade@higgsandassociates.com	1279
gofwuletul@gmail.com	1273
audacitymediallc01@outlook.com	1147
lucyhillgau@aol.com	811
adwodguru@gmail.com	766
lindsaydoddsgan@aol.com	735
karl.ramdy@gmail.com	721
krismark.copina123@yahoo.com	691
domain@roverfour.science	667
mfurst999@gmail.com	662
superman.superman@aol.com	618
ramdy.montives@yahoo.com	616
futurebrightsolutions123@yahoo.com	598
sheisamonsterlalala@mail.com	595
bobbiesmyleyem@aol.com	587
estherdinneenam@aol.com	583
yellowmediaads101@outlook.com	573
will.curry1@aol.com	563
delacruzvince49@yahoo.com	559
ruddsbunch@yahoo.com	554
chezzyonesyouknow@mail.com	538

admin (Alpnames)	reported domains
theresegirteca@aol.com	537
stephaniecassidyeg@aol.com	503
mariabidgooduk@aol.com	490
aimifrostvad@aol.com	481
keelyconstableyda@aol.com	480
keishadentmeb@aol.com	443
susietippleea@aol.com	436
yellowmediadomainmanager@outlook.c	434
thcurry@consultant.com	413
rwnutra@aol.com	407
kxmediasol17@gmail.com	392
sromero@post.com	386
tumbalikarlkenji@yahoo.com	379
admin@acare.science	375
futurebrightsolutions444@outlook.com	374
sheenamarievaldez@outlook.com	363
clairehandcyr@aol.com	359
emailwhois@aol.com	355
commoncore1@aol.com	352
shannonnaeempi@aol.com	346
rajsingh01114@gmail.com	325
aloriamdomain@gmail.com	320
leejustin428@yahoo.com	315
bigjulieeee@hotmail.com	312
ingridyateslo@aol.com	301
domaincampaign111@mail.com	273
destinationweb@engineer.com	272
vanessajones659@gmx.com	269
pennyfeneckdui@aol.com	269
rogthomp@mail.com	264
maxinehewittyki@aol.com	252
hbyron03@gmail.com	251
m.shiwali.ms@gmail.com	244
verysmartnida@gmail.com	242
judithobrienuka@aol.com	238
admin@rwnutra.com	233
vhalighorphis1101@yahoo.com	232
traceymilnegli@aol.com	225

admin (Alpnames)	reported domains
brookekayleipo@aol.com	221
ericsimpson465@gmx.com	220
kayalmondve@aol.com	220
neilglover957@gmx.com	218
sammyguy@usa.com	218
audacitymediallc@yahoo.com	215
manke9799@gmail.com	213
futurebrightsolutions@yahoo.com	201
toddpkoster@yahoo.com	197
lucashughes251@gmx.com	196
samanthahamilton559@gmx.com	191
jeanwillis223@gmail.com	189
mmas.girl@gmail.com	187
chingychangy111@yahoo.com	186
justinalolor@mail.com	180
andreaamphlettcim@aol.com	179
yellowedia11011@yahoo.com	174
rajendra.kaur@india.com	169
jonnyboy1@usa.com	163
danreputation@outlook.com	163
elstangeti@aol.com	162
dubeyjoyti34@gmail.com	158
kevinpayne476@gmx.com	157
kxmediasolutions117@yahoo.com	155
charanram1234@yahoo.in	152
timopru523@gmail.com	147
alorewdomain@gmail.com	140
rhiantenagliaci@aol.com	140
getservice09@gmail.com	138
jakibrookeaos@aol.com	134
accelerated.tester@gmail.com	134
ruwtanino@gmail.com	133
perlinchickie@yahoo.com	129
saveojuliiat@india.com	125
rochelkarimi26@gmail.com	111
admin@heelin.faith	110
likemalik0@gmail.com	110
tanesj.piyush12@gmail.com	109

3.2.2. eNom Inc. (Score: 31)

eNom, Inc., 15801 NE 24th ST, Bellevue WA 55436, United States, 425-274-4500, legal@enom.com

Below is a list of the top 95 domains administrators reported for abuse.

admin (eNom)	reported domains
WHOIS@BLUEHOST.COM	7252
GRANT_JAMES2@AOL.COM	2913
SUPPORT@HOSTMONSTER.COM	2794
LARRYFLIN22@GMAIL.COM	2678
ANCELETINC@GMAIL.COM	2045
WEBMASTER@VARNETSERVICES.COM	1994
simpleinfo2121@gmail.com	1352
WEBMASTER@NIZMEDIAGROUP.NET	1271
uptimehosting@outlook.com	1169
ADMIN@VVSDATABASEREL.COM	1117
TECH@WESTSYNCDATACENTER.COM	1054
ADMIN@N4SGROUPCOMM.COM	1001
SMITH@MARQANDSMITH.NET	905
researchpromocenter@gmail.com	880
VV2@VV2GROUP.COM	825
destinationweb@bellair.net	803
WHOIS@JUSTHOST.COM	782
michaelp77x@gmail.com	736
AshleyBeanily@aol.com	720
eriecaggiano@yahoo.com	715
AlisonsDegraagfd@aol.com	633
tyadamssd@gmail.com	600
AC@ACNOTIFICATIONS.NET	599
MHOMES223@INBOX.COM	593
2006@NIP.NET	547
S2KHOST@GMAIL.COM	539
RIVERPLATEMEDIA@GMAIL.COM	530
ADMIN@QZWCONNECTIONS.COM	516
MATTWOLFEITS@GMAIL.COM	498
coloplatinumhosting@tech-center.com	488

admin (eNom)	reported domains
REPLY@NATIONALRESEARCHFCS.COM	487
StaceiSwannvsu@aol.com	478
BROKERAGE@BUYDOMAINS.COM	450
DOMAINS@HOSTGATOR.COM	437
MIKEPRESCOTT7777@GMAIL.COM	429
INFO@CONSULTANTSOFNETPATHGREEN.C	426
cassyzambrano@yahoo.com	426
CRAYTETECH@GMAIL.COM	416
stassinopolusjane@yahoo.com	402
FIALLOSNETWORK@GMAIL.COM	402
cntproductions@fastservice.com	393
THEGOAT4EVER@GMAIL.COM	390
C3@C3TNNETNET.NET	388
DOMNET7@MAIL.RU	383
CS@CONTACTDESK.NET	381
EsterTorres550@gmail.com	362
KRO@KROMEDIAGROUP.COM	354
DOMAIN@LUTGROUPTELL.COM	345
MIKEPRESCOTT4@GMAIL.COM	341
ADMIN@PEEKEREALMNET.NET	324
MJTMARKETINGINC@GMAIL.COM	321
DOMNET6@MAIL.RU	313
SUPPORT@NAMECHEAP.COM	310
transientmarketingdirect@gmail.com	309
globalsystems190@gmail.com	306
hostingteam@fastservice.com	303
zane_lyle@yahoo.com	298
WALL@IZVOGANSSYS.COM	297
vitalerutherford@yahoo.com	297
arethabouliane@yahoo.com	295
destinationweb@outlook.com	292
SPAUL234@OUTLOOK.COM	286
PARCELGROUPMARKETING@GMAIL.COM	285
NOC@UPDATENOTICEMESSAGES.COM	284
robertnorthern81@gmail.com	277
CONTACTMASTER33@GMAIL.COM	275
RONJ2396@GMAIL.COM	272
DOMAIN@MEMBERUPDATESYSTEMS.COM	265

admin (eNom)	reported domains
skysofthosting123@workmail.com	258
RH.ITT.FIRM@GMAIL.COM	255
debee.selway@yahoo.com	255
CarolinePitchforddav@aol.com	254
dale.cora@yahoo.com	244
TECHADMIN@CLOUDTECHVPS.COM	235
destinationweb@engineer.com	231
EPOSCOMPANY11@GMAIL.COM	230
stplanetmedia@gmail.com	229
EOJ@EOJRELATIONS.COM	227
RICGOMEZ334@MAIL.COM	225
POSTMASTER@AOGMEDIAGROUPFARM.C	224
aaatechsuprt@gmail.com	223
WHOIS-ADMIN@ARCHEO.COM	216
digitalweb@webname.com	212
ReneeWasjonesebk@aol.com	209
PBX@NYM.HUSH.COM	204
GOOGLECLIENTS@ENOM.COM	201
JAKIQUINNGEU@AOL.COM	200
SHARRONSTROUDTU@AOL.COM	199
YAROSLAV.SKOROBOGATYY@GMAIL.COM	196
HARTBEATSOUND22@GMAIL.COM	195
JAY7NYC@HOTMAIL.COM	195
sharitymcaleavey@yahoo.com	195
ricky.alexis@aol.com	194
GAMESEO25@GMAIL.COM	190
RuthAstonipo@aol.com	189

3.3.3. Internet.bs Corp. (Score: 32)

Internet Domain Service BS Corp, Ocean Centre, Montagu Foreshore, East Bay Street Nassau The Bahamas P.O. BOX SS-19084, Bahamas, +1.5162347819, info@support.internet.bs

admin (internet.BS)	reported domains
dynamicresponse1@gmail.com	220
taskmaster@bluemediagroups.net	117
bluemediagroup1@gmail.com	101
rungergun@gmail.com	70
AfnicRoleObject@internet.bs	59
steve807jam@hotmail.com	55
deliveryagent99@gmail.com	51
jenn22093y@outlook.com	44
info@cdnproperties.com	41
ivan-kalshnikov@safe-mail.net	39
vpqerasmusfg@yahoo.com	36
hele0129ne@outlook.com	35
contact@scarletttechnologies.com	32
chiccodin@aol.com	29
falabellalogos2012@gmail.com	28
monjeur@monjeurenterprisesltd.com	27
br1924an@hotmail.com	27
ti1435m@hotmail.com	24
contact@hammerheaddomains.com	22
yybyranndd@yahoo.com	22
steph9283ne@outlook.com	22
ri91432rd@hotmail.com	21
frazysandi0142@outlook.com	21
jas872on@hotmail.com	21
prittylinda7823@hotmail.com	21
ujjcristinfid@yahoo.com	20
jonatwork6806@outlook.com	20
nickis05inlv@hotmail.com	20
maalca2012@gmail.com	19
info@hostingtechnologyworld.com	18
kevin298n834@outlook.com	17
domain@serverlet.com	17

admin (internet.BS)	reported domains
bardana02wi89@outlook.com	17
co892rey8m@hotmail.com	16
steve098jam@hotmail.com	16
dan.snyder1980@gmail.com	16
fergithere98sa@outlook.com	16
emmisonf8re@outlook.com	16
vincentedaniels@gmail.com	16
vgphaidraupr@yahoo.com	16
win1forlinda63@hotmail.com	16
laur9125a@hotmail.com	16
domainsadmin@rstracking.com	15
ca2934rl@hotmail.com	15
anonymous@nowhere.xx.fr	15
steve44simmons@yahoo.com	14
jmitts0923@hotmail.com	14
hollins834maria@outlook.com	14
gresh02alisa7@hotmail.com	13
karen65hlly@outlook.com	13
ntrozalieqjq@yahoo.com	13
duff23jenn92@outlook.com	13
rhevinnieqv@yahoo.com	13
jenn82vego29@hotmail.com	13
larrypage7347@armyspy.com	13
bstafford893@hotmail.com	13
more25katy19@hotmail.com	13
akfrichyfxb@yahoo.com	13
vygabrielabrb@yahoo.com	13
astith9202@outlook.com	13
barnett92linda1@outlook.com	12
jessievalle2014@gmail.com	12
griffin982katy@outlook.com	12
ystfabricesv@yahoo.com	12
paulh8921@outlook.com	12
braden92leah1@hotmail.com	12
warner53traci22@hotmail.com	12
jdub9@gmail.com	12
getreached@outlook.com	12
lori23bold91@hotmail.com	12

admin (internet.BS)	reported domains
crzymichelle237@outlook.com	11
info@financetechhosting.com	11
domains@offshore-hosting-service.com	11
testjoker1@gmail.com	11
m902gill34@outlook.com	11
lpmike53@gmail.com	11
oxmindadb@yahoo.com	11
info@longlinehosting.com	11
britt69baxter@yahoo.com	10
jrichardson@gmail.com	10
pete22tracy32@outlook.com	10
contact@broadswordhosting.com	10
mneeley15342@gmail.com	10
rachisinlv22@outlook.com	10
neat17carolc2@hotmail.com	10
njavinitakde@yahoo.com	10
topgiftcardguys@gmail.com	10
daugh32alex@outlook.com	10
suthdan3902@hotmail.com	10

3.3.4. Moniker Online Services LLC (Score: 48)

Moniker Online Services LLC, 1245 South Powerline Road, #293, Pompano Beach FL, 33069, United States, 800-688-6311, bwittenburg@key-systems.net

sdmin (Moniker)	reported domains
khimmus@southernonlinemedia.com	497
matthewtayloraaa@gmail.com	349
sysrenew@adknowledge.com	222
lulu.ngoan@usa.com	209
adult.parking@gmail.com	97
domainadmincontact@gmail.com	91
domains@percivalrock.com	88
info@tychism.com	80
tontin930@yahoo.com	72
mike@aivanetwork.com	70
postmaster@wesmushed.com	68
partnersupport@snapnames.com	65
kikitony123123@gmail.com	61
admin@adminmanagerllc.com	50
domainadmin@tm-online.net	47
admin@mediarevenue.com	46
moshenhm@gmail.com	45
rondacampbell@4rumchat.net	43
clairedanes33@gmail.com	42
dotcomproducts@yahoo.com	42
gatherinfo@gmx.com	41
abuse@americanmadecompany.com	35
email816@aol.com	34
domkeeper777@gmail.com	32
lippifranco76@gmail.com	31
fraudcheck@moniker.com	31
mixenmedia@gmail.com	30
cathy@segpay.com	29
adminam@snapnames.com	29
farn_29@hotmail.com	29
gishadomains@gmail.com	28
johnalexander687@yahoo.com	28
vinnie@independentmediagroup.com	28

sdmin (Moniker)	reported domains
trunk_you_88@hotmail.com	28
dns@gnousa.com	27
dns-admin@fma.net	27
admin@pinnacleipsource.com	26
domains@cyhawk.com	26
admin@domainassetholdings.com	25
domainadmin@acceas.com	25
kristina@4rumchat.net	25
proxy@privateregistrationservices.com	25
brokerage@buydomains.com	23
flexibility@pisem.net	23
michail@infoincaworld.com	23
duece27@gmail.com	22
admin@CRABLESS.NAME	21
postmaster@blahing.name	21
sarah198mooo@hotmail.com	20
frances2good@outlook.com	20
acquirethisname@gmail.com	20
tanja@masterjedi.net	20
webmaster@prolastlimited.com	20
abuse@pismomediamail.com	19
ceo@blueriveralliance.com	19
gregorybrondou@yahoo.com	19
admin@domainsgeneral.com	19
domainprivacyservice@gmail.com	19
loural24@outlook.com	18
phil_p22@outlook.com	17
neallee545@yahoo.com	17
marketingtest8@gmail.com	16
petermacus@outlook.com	15
pjohn83@outlook.com	15
buy@domainshop.com	15
domainadmin@flm.net	14
mandrik@gmail.com	14
traviswolf502@yahoo.com	14
douglas@tychism.com	14
janet@domainsgeneral.com	14
office@btabic.com	13

sdmin (Moniker)	reported domains
vernjames@outlook.com	13
sergey1313@gmail.com	13
ecorpcom@gmail.com	12
robert@4rumchat.net	12
contact@findyourdomain.com	12
bhennessy@perkinscoie.com	12
thelmalowery@gmail.com	11
info@xenya.com	11
robkasen@gmail.com	11
contact@roundscripts.com	11
tonya@UHOSTINGCOMPANY.COM	11
abuse@xactmail.cc	11
domadm@mustneed.com	11
josejphffouchejr@4rumchat.net	11
support@adilizer.com	11
accounting@domainownershiplimited.com	11
admin@telepathy.com	10
support@domaincapital.com	10
info@virtual360publishing.com	10
accounting@contentownershiplimited.com	10
scranton199@gmail.com	10
katteinc@gmail.com	10
key21@dreamwiz.com	10
domains@original.com	10

3.3.5. NameCheap Inc. (Score: 49) ⚑

NameCheap, Inc., 11400 West Olympic Blvd., Suite 200, Los Angeles CA 90064, United States, 323-448-0232, support@namecheap.com

admin (Namecheap)	domains reported
jimmie.decoster@aol.com	489
adreactionltd@gmail.com	470
accelerated.tester@gmail.com	378
yellowmedia13@gmail.com	354
dalhaze91@gmail.com	321
paulfpeterson@yahoo.com	249
thresholdads@gmail.com	219
sromero@post.com	199
aphroditepartners@gmail.com	174
operations@elitemodernmarketing.com	144
advertising@gamblingscope.com	132
wade@higgsandassociates.com	119
accelerated.brian@gmail.com	117
JakiQuinngeu@aol.com	114
aaatechsuprt@gmail.com	108
sammyguy@usa.com	101
glennsanchez26@gmail.com	100
accelerated.eric@gmail.com	96
frankcponce@jourrapide.com	92
DhannaCambriameu@aol.com	89
jessievalle16@gmail.com	87
vitiate@loveyou.lu	85
HaleyTraylinges@aol.com	80
will.curry1@aol.com	80
SharronStroudtu@aol.com	78
admin@heelin.faith	77
JaneenLoomesyd@aol.com	75
amer_enterprises@hotmail.com	75
RuthAstonipo@aol.com	65
StaceiSwannvsu@aol.com	63
toddpkoster@yahoo.com	62
it@systream.net	57
xdelivered@gmail.com	54

admin (Namecheap)	domains reported
ldeatarg@yahoo.com	51
rjbecker81@yahoo.com	50
ReneeWasjonesebk@aol.com	48
admin@maviler.work	47
bcolby@neturn.com	47
rhetty@mail.com	47
sbrand1099@hotmail.com	44
debee.selway@yahoo.com	42
wpkap@wpkap.de	41
savethecheerleadersavetheworld@gmail.	40
mjohnson@neturn.com	40
rootlt4@yahoo.com	35
DaniellaChadwickbil@aol.com	35
maggieanderson303@aol.com	35
admin@hostingmadeeasy.info	32
rwatson@neturn.com	31
info@torontohostingpros.com	31
support@51del.com	30
cassyzambrano@yahoo.com	28
NoemiyeKoobco8772@hotmail.com	27
RachaelFeneckuga@aol.com	27
tristan@lumail.lu	26
davidfannylove@gmail.com	26
newrenegade2016@gmail.com	26
arhoades@neturn.com	26
trlanzalotto@mail.com	25
williamcsnell@neturn.com	25
vitalerutherford@yahoo.com	24
boblilwaters@mail.com	24
futuristicmail@inbox.com	24
jones@aol.com	24
constanceulysses@aol.com	24
resumes@clerk.com	23
rishab.shukla01@gmail.com	23
cchaddietedlow@yahoo.com	23
testoffers0@gmail.com	22
boblslkjwaters@email.com	22
m.shiwali.ms@gmail.com	21

admin (Namecheap)	domains reported
stevelay143@gmail.com	21
bobbilskjwaters@email.com	21
caleb@mediaresultsgroup.com	20
dealydan951@yahoo.com	20
bobeltwaters@email.com	20
ClareHemsworthog@aol.com	20
dan_hapler@aol.com	19
julianhenry89@aol.com	19
bobdhwaters@email.com	17
bobloslowaters@email.com	17
vivsachdeva@hotmail.com	17
claimfreerewards@gmail.com	17
bobboslwaters@email.com	17
joleneharper2@aol.com	16
krismark.copina123@yahoo.com	16
Skyescent123@hotmail.com	16
landonjake44@outlook.com	16
tenebrous@unseen.is	16
danielma33@secretrich.com	15
tkmark713@gmail.com	15
tech@suncastmedia.com	15
carey@usdpi.org	14
andersonjeff54@yahoo.com	13
engbills180001@gmail.com	12
whitearrow6969@gmail.com	11
jpcserv2@juno.com	11
earlhoward542@hotmail.com	11
tlanzalotto@email.com	10
nande101@gmail.com	10

3.3.6. Name.com Inc. (Score: 65) ✦

Name.com, Inc., P.O. Box 6197, Denver CO 80206, United States, 1-720-249-2374, support@name.com (OR) 5808 Lake Washington Blvd. Suite 300, Kirkland, WA 98033, US, 425-298-2293, transfers@name.com

admin (Name.com)	domains reported
aaa1@riip.com	1116
aaa3domain@gmail.com	537
susandimattoe2@hotmail.com	204
custservice20@gmail.com	146
sudanolisa@hotmail.com	126
csr11customer@live.com	118
contact@BasedServices.org	100
clipagabriel@rocketmail.com	99
csr8customer@live.com	95
custservice21@gmail.com	80
christyqueen55@hotmail.com	78
info@metatrader4fx.com	78
digitalweb@webname.com	75
choawill@yahoo.com	73
customservice19@gmail.com	71
eboxinbox@outlook.com	61
n.petersfl@gmail.com	60
hostmaster@proxad.net	60
admin@telepathy.com	59
techsupport@aaa-enterprise.com	56
blahman1871@gmail.com	52
hostmaster@targetedpages.com	52
matpage1402@hotmail.com	51
jimyoungconsole@gmail.com	48
csr3customer@gmail.com	45
rcmdelivery@outlook.com	42
contact@skyridgehosting.com	42
admin@mycooloffers.net	42
admin@besthostway.com	40
pennariverdam@hotmail.com	38
easystreetmkt@gmail.com	37
contact@campusflashlight.com	36

admin (Name.com)	domains reported
contact@CelebritiesFansClub.com	36
waychoa@yahoo.com	33
customservice17@gmail.com	33
Administrator@dninquiry.com	30
castlerockz123@gmail.com	29
diaz.chris355@gmail.com	27
chenxi38992@yahoo.com	26
support@galaxiehost.com	25
ghitamt@rocketmail.com	24
accounts@intersolved.com	23
custservice15@gmail.com	23
mswilson09817@gmail.com	21
dnsadmin@skyridgehosting.com	21
hostmaster@nationsay.com	20
SerinaThalmanh4183@hotmail.com	20
custservice16@gmail.com	19
csr13customer@live.ca	19
email.whois@aol.com	18
GarySlaughterfgbf@gmail.com	18
tatiana28ey@163.com	18
madgolfer22@hotmail.com	18
tonyrobinson@mailinator.com	17
blazebane10@gmail.com	16
custservice14@gmail.com	16
digimarketing99@gmail.com	16
dommngmt@gmail.com	16
WayneClaxtonmghgnm@gmail.com	15
bersteinjohn33@gmail.com	14
customservices18@gmail.com	14
domaines@phpnet.org	14
gugebusiness@gmail.com	14
kiladen@gmail.com	14
pheasantvalleymarketing@hotmail.com	14
yildizmail@ymail.com	13
markph1978@gmail.com	13
support@mavenhosting.com	13
sales@gonamesales.com	13
maykelly536@yahoo.com	13

admin (Name.com)	domains reported
erberg89@gmx.de	12
help@vpsserving.com	12
haob2b@gmail.com	12
jessevo25084@yahoo.com	12
stephenshars561@yahoo.com	12
jetmail14@gmail.com	12
KayVadners7562@hotmail.com	12
ericmathews1332@yahoo.com	12
chris202p@gmail.com	11
simmonsdavid250@gmail.com	11
custserv550@gmail.com	11
gerenciaservidores@gmail.com	11
support@o2switch.fr	11
jnzeus2@yahoo.com	11
jmjadsinc@gmail.com	11
ALEXLERMAN@ALEXLERMAN.COM	10
sarlmondialproje.166404@spamfree.b	10
StevenAlexanderghfdg@gmail.com	10
mandrik@gmail.com	10
domainmanager@moniker.com	10
computersurfer99@gmail.com	10
ig2tgroup@gmail.com	10

3.3.7. PDR Ltd. d/b/a PublicDomainRegistry.com (Score: 66)

PDR Ltd. d/b/a PublicDomainRegistry.com, Directiplex, Mogra Village, Nagardas Road, Andheri (East), Mumbai Maharashtra 400069, India, +1 2013775952, tldadmin@logicboxes.com

admin (PDR)	reported domains
admin@offercentral.club	905
tenebrous@lumail.lu	666
admin@tvspots4less.com	651
thcurry@consultant.com	472
privacy@RespectedResponse.org	307
mfurst999@gmail.com	289
rjwhois@gmail.com	268
rjfords@yahoo.com	257
ronj2396@gmail.com	243
knowledgec2@aol.com	242
nutra@earthlink.net	235
will@tvspots4less.com	213
dynamicresponse1@gmail.com	198
affirmanalytics@gmail.com	182
kashi_aguilar@yahoo.com.ph	170
privacyprotect@dynamicdolphin.com	153
mandy@fairviewpromotions.com	147
AndrewELamere@rhyta.com	144
asteamici@gmail.com	132
frankcponce@jourrapide.com	120
dmserv@post.com	119
masterwebinfo@ig.com.br	112
josephdstich@yahoo.com	107
goyal.tanya1002@gmail.com	105
yellowmediaads101@outlook.com	104
marketingexperts007@outlook.com	98
vinco.domains@gmail.com	97
jlhedley@linuxmail.org	88
artrewdomain@gmail.com	86
aiuckc@gmail.com	78
catherinemorris80@yahoo.com	78
limbarestul@gmail.com	71

admin (PDR)	reported domains
superman.superman@aol.com	70
janggas.sodomen@yahoo.com	70
admin@demographic-ads.com	68
leorevs111@yahoo.com	67
zhanghaozhanghao__@hotmail.com	66
ricardo@quoracom.net	62
tanesj.piyush12@gmail.com	59
karlaaguilar111@yahoo.com	58
verysmartnida@gmail.com	58
will.curry1@aol.com	58
vaidik.joshi6@gmail.com	57
admin@coral.plus.com	55
info@quotafull.com	55
dnsadm@sadecehosting.com	54
mat.hanker@yahoo.com	52
turbalosaging@yahoo.com	52
ambak.baki@yahoo.com	52
powerpositionmarketing@gmail.com	52
titit.bontit@yahoo.com	51
knobbyhill24@gmail.com	49
keriforrest62@gmail.com	48
sendla@yeah.net	46
allen.brewer@gmx.com	46
domadmin@privateregistrations.ws	46
cretzudomain@gmail.com	46
info@redehost.com.br	43
morris.catherine@mail.ru	43
romitbhati2@gmail.com	42
webhostseeker12@hotmail.com	42
jstark007@outlook.com	42
skysofthosting123@workmail.com	41
tldadmin@logicboxes.com	41
naveengupta2015@yandex.com	41
michaelkkrick@yahoo.com	40
abhi_dubey@outlook.com	40
lawrence.ledford@gmx.com	40
miha_smirnuy@yahoo.com	39
hr168foxmail@yahoo.com	39

admin (PDR)	reported domains
lokeshtripathi62@gmail.com	38
johnny.knight@gmx.com	38
chetaksingh303@gmail.com	36
kineticlinemediagroup@mail.com	35
ChristopherEBaker@teleworm.us	35
deepakssing8889@gmail.com	35
douglas@tychism.com	35
domeny@consultingservice.pl	34
m.shiwali.ms@gmail.com	34
admin@v3connect.com	34
newtorkvw@gmail.com	31
support@nic.ua	31
nix.rivera@gmx.com	30
mmathur022@gmail.com	30
tytryetytye@walla.com	29
mayurirawat46@gmail.com	29
gordonlee715@gmail.com	28
andyrun988@gmail.com	28
johnblentz1101@yahoo.com	27
hostmaster@ptisp.pt	26
gary.gifford@gmx.com	26
summer.singh0091@gmail.com	26
elsa.fuentes@yandex.com	25
joe.fink@gmx.com	25
vipin19.asati@gmail.com	25
patsyreed@yandex.com	24
contact@destinyindustries.com	24

3.3.8. Dynadot LLC (Score: 72) ✧

Dynadot, LLC, P.O. Box 345, San Mateo CA 94401, United States, 1-650-262-0100, info@dynadot.com

admin (Dynadot)	reported domains
tech@viral-media.net	2269
computersurfer99@gmail.com	888
affirmanalytics@gmail.com	673
thomaspatterns@gmail.com	120
domains@virustracker.info	99
fullforceservices.kevin@gmail.com	80
evq@evqgroupmidwest.com	54
whitedothosts@gmail.com	53
jamesgarf2014@gmail.com	42
adgaruma@outlook.com	34
domkeeper777@gmail.com	32
eli@nonnegative.com	28
harvestedemailfromwhois@elephantenterprisesllc	25
calimarketingmania@gmail.com	22
info@adrenalineads.net	21
joebravo2007@gmail.com	20
rubena.lowe@gmail.com	17
flexhostingltd@gmail.com	16
abuse@woot-web.com	16
domainreg@sunsetfish.com	14
support@viral-media.net	14
collectivemediabakery@mail.com	12
posti-1@suncomet.com	12
kcwebguy@yahoo.com	10
hk@eaglefuture.com	10
stevendupras@ymail.com	10

3.3.9. BigRock Solutions Ltd. (Score: 74) ✤

BigRock Solutions Ltd., Acme ITech Park, Old Nagardas Road, Next to Andheri Subway, Andheri (E), Mumbai Maharashtra 400 069, India, +91 22 30797900, registrar@bigrock.com

admin (BigRock)	reported domains
dynamicresponse1@gmail.com	592
deliveryagent99@gmail.com	365
abhi_dubey@outlook.com	312
info@accel-marketing.net	226
garry_b_graff@consultant.com	157
romitbhati2@gmail.com	124
raghav1458@gmail.com	123
likemalik0@gmail.com	95
wisechoicemedia@comcast.net	82
info@callingpartsnumb.biz	76
ronj2396@gmail.com	74
affirmanalytics@gmail.com	67
privacy@respectedresponse.org	61
ajeesharma55@gmail.com	51
veerendra_malviya@yahoo.com	46
kumar_rahul968@yahoo.com	45
babyfrakstan@gmail.com	39
amitduggal896@yahoo.com	38
toongmarting@yahoo.com	38
james.burrow15@gmail.com	37
mishraanamika097@gmail.com	37
gheorghitamutu@gmail.com	35
kabney@streamingmediahosting.con	34
tgcg01@yahoo.com	34
aslam.khan12358@yahoo.com	33
support@tomorastudio.com	31
amigleotan1111@yahoo.com	30
pholyjames101@yahoo.com	29
titit.bontit@yahoo.com	28
yourdomaincontact@yahoo.com	26
abuse@whatagiveaway.com	25
kayung.ming@yahoo.com	25

admin (BigRock)	reported domains
dilip192kud@gmail.com	24
larry.sanders38@yahoo.com	24
anoopsharma0092@yahoo.com	24
albert.somi1989@gmx.com	23
derekthompsontwo@yahoo.com	23
mjennifer393@yahoo.com	23
aalokdwivedi568@yahoo.com	23
vik585ashsharma@gmail.com	21
rq34fwfe@yahoo.com	18
vipul.tiwari07o@gmail.com	18
will@tvspots4less.com	18
ranuv327@gmail.com	17
intercontinentaldomaininc@gmail.con	16
euliceeliseo@yahoo.com	16
simarpreet5231@gmail.com	14
aumaseaguilar111@yahoo.com	13
drop2japan@gmx.com	13
nitin.bhore255@yahoo.com	12
shufflemark1@gmail.com	12
maheshmeena58@yahoo.com	12
dynamicresponse2@gmail.com	12
sunil.mazumdar22@yahoo.com	12
richkimble1977@gmail.com	12
livysweets@mail.com	12
asisi.ming@yahoo.com	12
suneel15kumar@gmail.com	12
kekero.hekya@yahoo.com	12
franklewes101@yahoo.com	12
kody.abney@grandstream.com	11
vvvconnect@gmail.com	11
vinamoralec101@yahoo.com	11
bajaj.223varun@gmail.com	11
ajinkya567kumar@gmail.com	10
josephdstich@yahoo.com	10
marlonalmario55@yahoo.com	10
leorevita111@yahoo.com	10
kenjimontives111@yahoo.com	10
veronicatan111@yahoo.com	10

admin (BigRock)	reported domains
ram154kumar@yahoo.in	10
rjbecker81@yahoo.com	10
alphainfolab.sanjay@gmail.com	10
help@offercentral.club	10
chenielarios101@yahoo.com	10
jethrouy43@yahoo.com.ph	10
prahlad.yg@gmail.com	10

3.3.10. Regional Network Information Center JSC dba RU-CENTER (Score: 76)

Regional Network Information Center, JSC dba RU-CENTER, 2/1, 3d Khoroshevskaya, Str., Moscow 123308, Russian Federation, +7 495 737 6975, tld-adm@nic.ru

admin (RU-Center)	reported domains
info@netangels.ru	7
penchevpenko@yahoo.com	6
markovochn@yandex.ru	4
mark.adamenko@gmail.com	4
admin@compubyte.vg	4
u217936@masterhost.ru	4
symsallen@yahoo.com	3
kovalev@holodilnik.ru	3
domenreg@softline.ru	3
Darwin_Medina@wolke7.net	3
noc@kdvm.ru	3
dolbonavt@gmail.com	3
miwosofeess@mail.com	3
service@nvhost.ru	2
slim2001.88@mail.ru	2
louiespencer@yandex.com	2
amurtsev@gmail.com	2
9350000@bk.ru	2
bezgranichnik@gmail.com	2
HOSTMASTER@GOLDSPACE.NET	2
roman.petriv@mail.ru	2
info@webstyle.ru	2
xingbhaitradings@yahoo.com	2
info@df.ru	2
joblack330@yahoo.com	2
santa_cl@bk.ru	2
TracyClement354@yahoo.com	2
wolflanddogs@gmail.com	2
Lapusik2085@yandex.ru	2
teror1r@live.com	2
domains@itib.info	2
vebservice@yahoo.com	2
combichem@gmail.com	2

admin (RU-Center)	reported domains
paralizat@web.de	2
drup@list.ru	2
evvan@mail.ru	2
rebecca.schmelting@gmx.de	2
wasserkauf@hotmail.com	2
nic@caravan.ru	2
svyaztel@gmail.com	2
nedvigimost@gmail.com	2
stakinghat918@hotmail.com	2
total_invest@mail.ru	2
noc@iprojects.ru	2
yury@rosintel.com	2
keyaipservices@gmail.com	2
deta@mail.ru	2

3.3.11. Intersolved-HI.com Inc. (Score: 86)

Intersolved-HI.com, Inc., 2967 Michelson Dr, Suite G489, Irvine CA 92612, United States, 9495001700, tan@pheenix.com

admins (Intersolved-HI)	reported domains
domains@candranet.com	403
domains@canadadrugsit.com	76
sales@intersolved.com	60
markalbers@comcast.net	59
accounts@intersolved.com	55
THQFEANPGJ6SBTYH@rebelprivacy.com	44
T3PNW6O8L2LLYPJE@rebelprivacy.com	43
ATMIW9DO6EMNKWO4@rebelprivacy.com	39
royce4sale@aol.com	38
UGA7NO8YM1839MNI@rebelprivacy.com	37
markalbers@adelphia.net	24
judith@coollawyer.com	19
Mark@paipinc.com	19
sales@goname.com	14
6BVJJC9BI1D1Y11Q@rebelprivacy.com	12
greatcoms@gmail.com	12
2M185J23A2I3HO7H@rebelprivacy.com	10

3.3.12 Above.com Pty Ltd. (Score: 97)

Above.com Pty Ltd., 8 East Concourse, Beaumaris VIC 3193, Australia, +61 3 9589 7946, hostmaster@above.com

admin (Above)	reported domains
windinv@yahoo.com	47
hostmaster@vautron.de	23
newfields@hushmail.com	22
WOLFI@WOLFIS.COM	20
mm@ddf.lu	17
395791986@qq.com	14
domains@karco.org	11
domains@intbrands.com	11
bobrovki@gmail.com	10

Registrars with scores above 100 are listed for reference without specific details. Details are available at knujon.com

3.3.13. TLD Registrar Solutions Ltd. (Score: 104)
3.3.14 OVH sas (Score: 109)
3.3.15 Instra Corporation Pty Ltd. (Score: 109)
3.3.16. DomainContext Inc. (Score: 113)
3.3.17. CSL Computer Service Langenbach GmbH d/b/a joker.com (Score: 119)
3.3.18. Active Registrar Inc. (Score: 119)
3.3.19. Trunkoz Technologies Pvt Ltd. d/b/a OwnRegistrar.com (Score: 133)
3.3.20. Bizcn.com Inc. (Score: 135)
3.3.21. Key-Systems GmbH (Score: 136)
3.3.22. DNC Holdings Inc. (Score: 148)
3.3.23. UK-2 Limited (Score: 153)
3.3.24. EvoPlus Ltd. (Score: 154)
3.3.25. Nanjing Imperiosus Technology Co. Ltd. (Score: 156)
3.3.26. register.com Inc. (Score: 161)
3.3.27. Namesilo LLC (Score: 165)
3.3.28. Network Solutions LLC (Score: 167)
3.3.29. Center of Ukrainian Internet Names dba UKRNAMES (Score: 168)
3.3.30. CommuniGal Communication Ltd. (Score: 175)
3.3.31. Universo Online S/A (UOL) (Score: 184)
3.3.32. Domain.com LLC (Score: 190)
3.3.33. Regtime Ltd. (Score: 198)
3.3.34. SafeNames Ltd. (Score: 199)

4. Conclusion and Recommendations

It may seem like a disconnect to some readers that this document starts with a discussion of the ICANN's website and ends with a list of the most abused registries and registrars. However, this is the core of the issue. ICANN is not connecting to consumers, but the abusive parties are connecting to consumers. So what the consumer sees is the ugly side of the Internet. The actual access to ICANN's complaint or compliance process is hidden. ICANN's website structure appears designed to avoid accepting complaints from consumers and deflecting any responsibility to external entities. Whether by design or negligence, the problem needs to be addressed immediately. Obfuscation and misdirection are not strategies for gaining consumer trust. ICANN has made a considerable effort to balance the potential influence of global governments over Internet policy. However, the constant message to consumers of "go to the police".

What ICANN needs to do is: 1) Publish an informational PDF for consumers the same way it does for journalists, lawyers and others, 2) Create and deploy an obvious and easily navigable visual workflow for guiding Internet users, 3) Conduct outreach to global consumer groups as recommended by consumer experts, 4) Dedicate a staff lead within compliance to handle consumer issues, 5) Test all their procedures and methods for from the Internet user perspective, 6) Properly link all public information, and 7) Collect and report on back Internet user abuse data.

The registries and registrars listed in this report vary wildly in their responses. Some are helpful and proactive, but this is entirely voluntary. ICANN can lead by example and truly include the Internet consumer by being proactive on serious issues that impact the entire global network. This is not outside of the remit.