



children's charities' coalition on internet safety
10 Great Queen Street, London, WC2B 5DG

Rt Hon Mrs Theresa May MP
10, Downing Street, London SW1A 2AA

Rt Hon Karen Bradley MP
100, Parliament Street, London SW1A 2BQ

Rt Hon Amber Rudd MP
2, Marsham Street, London SW1P 4DF

3rd April, 2017

Dear Prime Minister and Secretaries of State,

ICANN – a huge disappointment and a worry

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

Inter alia, ICANN is responsible for “keeping the internet secure”. As you will see from the attached briefing ICANN has definitely *not* been keeping the internet secure for children. On the contrary ICANN shows complete indifference towards children’s safety. This has led to real dangers that ICANN could have prevented or mitigated.

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

ICANN, the Registries and the Registrars have an obvious financial interest in increasing the number of domain names being sold. Their interest in maximising or securing their revenues appears sometimes to blind them to a larger obligation to protect the weak and vulnerable e.g. in this instance children.

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

Who is going to win the global contract to run this domain in the English language has still not been decided. Amazon and Google are both in contention. However, thanks to ICANN’s obscure processes we only recently discovered that ICANN has in fact already let .kids in the Russian language but they made no stipulations to ensure known paedophiles would not be able to buy or operate a child focused website within the .kids domain. Neither did they

make any stipulations forbidding known paedophiles from working for a company or organization that operated such a site.

Obviously there is a risk this could be repeated when .kids in English is finally decided and while I am sure both Google and Amazon will choose to do the right thing, whichever one is the eventual winner of the contract, the point is matters of this kind should never have been left as an option. By not making such elementary child protection practice compulsory ICANN was grossly negligent and if ICANN does not change its approach it could happen again with other child focused domains should there be any additional ones in the future.

What happened with .kids stands in sharp contrast to what happened when the .bank, .pharmacy and .insurance. domains were initiated as a result of the same 2012 process. Here a "pre-approval" procedure was developed to minimise or eliminate the possibility of bad actors being able to buy or run a banking, insurance or pharmaceuticals website. This has worked extremely well. So far there are no known cases of misuse.

Down the years the domain where the lion's share of child abuse images have been found is .com, owned by Verisign (see above). However, today the Internet Watch Foundation, the UK's hotline, has released numbers which show that in amongst some of the new domains ICANN allowed post-2012, criminals have started spreading child abuse images on a significant scale. In 2016 the IWF took action against 272 websites within the new domains involving over 1,550 web addresses. This represents an increase of over 200% and almost 400% respectively on last year, demonstrating that a trend is taking root and gathering pace. Faced with a choice about whether or when to create the new gTLDs ICANN could have chosen not to proceed until stronger security measures could be put in place to reduce the scope for misuse, perhaps by insisting that the true identities and location details of every web site owner are verified and known. They didn't do this.

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

ICANN is an independent organization. No single government can direct its actions but the ICANN Board have to listen if a large enough number of governments, public agencies and citizens speak out. For that reason, as you will see in the briefing paper, we are asking the UK Government to make its views known to the ICANN Board and for UK Government representatives to use whatever channels of influence they have at their disposal to persuade ICANN to acknowledge they have a duty of care to children and act accordingly.

We are also writing to the US Federal authorities and to the Attorney General of California in similar terms.

Yours sincerely,



John Carr OBE
Secretary
www.chis.org.uk

chisgb@outlook.com