



10 Great Queen Street, London, WC2B 5DG

19th October 2018

Mr Joseph J. Simons
Chairman
Federal Trade Commission
600, Pennsylvania Avenue NW
Washington, DC 20580

Dear Mr Simons,

I am writing to you to request that the Federal Trade Commission takes whatever actions are necessary in order to secure substantial improvements by Verisign in reducing the levels of serious abuse, particularly the trafficking in child sexual abuse imagery, occurring on websites operated under top level domain names administered by them.

Since we were formed back in 1999, the [coalition](#) of children's organizations which I represent and work with has had a major interest in finding ways to restrict or eliminate the distribution of child sex abuse material over the internet

As with many other illegal activities, the trafficking in child sexual abuse imagery online continues to grow at alarming rates. We are witnessing increases of nearly 40% in child sexual abuse urls and 60% in the number of domains that are used to display images or videos of children being sexually abused. Unfortunately, the overwhelming majority of these domains are located within .com and .net, both of which are administered by Verisign. The latest [Annual Report](#) of the Internet Watch Foundation meticulously documents these troubling statistics.

Over the years we have made several attempts to contact Verisign seeking to discuss how we might collaborate to combat the child sexual abuse imagery that is rampant on their domains. I have only ever had one response and that was three months ago when their PR agency, Weber Shandwick, contacted me to ask for a document I had written. I sent it, tried to follow up. Zero response.

Verisign is uniquely unforthcoming. We have regularly worked and had conversations with just about every internet company you can think of and quite a few you are unlikely to know. Only Verisign has been so utterly uncommunicative. This is a very poor show and runs completely contrary to the spirit of multistakeholderism.

Enlisting the active and effective voluntary cooperation of domain name Registries is now more important than ever to combat online illegal activity. As you are undoubtedly aware, since ICANN implemented a Temporary Specification in response to the European General Data Protection Regulation, access to WHOIS information about domain name registrants

has been effectively removed from a number of parties who previously played an important part in keeping crime off the internet. I have [written](#) about this separately and have concluded that this situation will not be resolved soon.

Given that context it is particularly critical for online platforms and intermediaries to take on greater responsibility in the fight against this singularly tragic form of abuse. Some other Registries, notably [NOMINET](#), have shown that things can be done. For example, every day, using a lexicon of terms provided to them by the Internet Watch Foundation, NOMINET runs a check on each new registration to ensure it is not likely to be used to distribute child sex abuse material. NOMINET is not a small Registry. It shows things can be done at scale, if there is a will to do them. Verisign appears not to have that will so we must look to others with the power to persuade or compel them.

To put the matter plainly, it is immoral for a business to attempt to deflect responsibility by arguing these matters are the sole provenance of law enforcement and courts. As the dominant Registry in the global system, Verisign should be taking a leadership position, adopting voluntary procedures to combat online child sexual abuse. It should put in place clear and transparent processes to ensure the swift suspension of domains within their purview that are involved in distributing child sexual abuse imagery and take steps to reduce the prospects of new domains being established and used in like manner in future.

What is equally distressing is ICANN's inability or unwillingness to bear down on Verisign in relation to matters of this kind. It has not gone unnoticed that Verisign is the largest single contributor to ICANN's finances. The latest figures suggest ICANN derives over 30% of its total income from this single source. Whether that brings it within the definition of a monopoly must be moot but even so it casts ICANN's failure to act in a different light.

I strongly urge the FTC and the rest of the United States Government to use whatever leverage is at its disposal to push Verisign to do the right thing and stop dragging their feet. The lives and well-being of children are at stake.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Carr', written in a cursive style.

John Carr OBE
Secretary