

February 10, 2020

D. James Bidzos
Chief Executive Officer

Pat Kane Senior Vice President, Naming and Directory Services
Verisign, Inc.
12061 Bluemont Way
Reston, VA 20190-5684

Dear Messrs. Bidzos and Kane:

We are writing regarding Verisign's lack of effort in deterring child sexual imagery and human trafficking via domains on .com and .net.

NTIA announced last year that, in connection with execution of Amendment 35 to the Cooperative Agreement with ICANN, Verisign would work with NTIA and other ICANN stakeholders "in the coming year on trusted notifier programs to provide transparency and accountability in the .com top level domain."¹ It has now been a little over a year since that announcement was made, and we are writing to inquire as to what Verisign has done to honor that pledge.

Our hope was that the announcement meant that Verisign would work with trusted partners on a voluntary basis to address all forms of abuse occurring online over top level domains (TLDs) Verisign manages, including concerns with child sexual abuse images and videos. In the 2017 Annual Report from the Internet Watch Foundation, five top level domains (TLDs) accounted for 85% of all webpages identified as containing child sexual abuse images and videos.² Of these top 5 domains, the most prolific where .com (59.5% or 39,937 web pages with child sexual abuse imagery) and .net (19.4% or 12,990 web pages of child sexual abuse imagery).³ While we understand that .com and .net are large gTLDs, these percentages for child sexual abuse imagery is significantly higher than the overall market share for those two gTLDs (50.5%, with 46.7% on .com, and 3.8% on .net).

The Internet Watch Foundation's report for 2018, released in April 2019, did not include the detailed breakdown of number of web pages per gTLD. However, it once again identified that .com and .net were among the top 5 gTLDs accounting for 80% of all webpages identified as containing child sexual abuse images and videos.⁴

Interestingly, while .org made the top 5 list in Internet Watch Foundation's 2017 Annual Report, it dropped out in the 2018 Annual Report. Moreover, the operator of .org, Public Interest Registry, along with several other registries and registrars but excluding Verisign, issued a framework to address DNS abuse that specifically called for disruption of domains associated

¹ <https://www.ntia.doc.gov/press-release/2018/ntia-statement-amendment-35-cooperative-agreement-verisign>

² https://annualreport.iwf.org.uk/#statistics_and_trends_2017

³ https://annualreport.iwf.org.uk/#statistics_and_trends_2017. The other 3 top TLDs were .org (with 5,854 such webpages), .ru (with 5,576 such web pages) and .co (with 2,714 such web pages).

⁴ <https://www.iwf.org.uk/sites/default/files/reports/2019-04/Once%20upon%20a%20year%20-%20IWF%20Annual%20Report%202018.pdf>.

with child sexual abuse materials or human trafficking.⁵ We understand that, as of mid-December, 2019, 48 registrars and registries had signed onto those principles, though Verisign was still not one of them.⁶

Given the above, we would appreciate answers the following questions no later than February 14, 2020:

1. What has Verisign done to date to set up any trusted notifier program with any entity, and what does that trusted notifier program entail?
2. What has Verisign done on a voluntary basis (i.e. absent a court order) to disrupt domains on .com (or .net or other TLDs that Verisign manages) that are associated with child sexual abuse materials or human trafficking?
3. What does Verisign do on .com, .net (or other TLDs that Verisign manages or provides back-end registry services to) to verify the identity and location of the registrant, screen for potential abuse of the domain, or audit a domain on such TLDs for such abuse?

Please send your e-mail response to 

Thank you very much and we look forward to your response.

Sincerely,

ECPAT-USA
Lori L. Cohen Executive Director

Enough Is Enough
Donna Rice Hughes, CEO & President

Childsafe.ai
Rob Spectre, CEO

National Center on Sexual Exploitation
Patrick A. Trueman, Esq, CEO & President

Sanctuary for Families
Judy Kluger Executive Director

Rev. Dr. Marian Hatcher Ambassador-At-Large,
United Nations SPACE International USA Representative

⁵ <https://thenew.org/pir-fighting-abuse-join-us/> and http://www.circleid.com/pdf/Framework_to_Address_Abuse_20191017.pdf

⁶ <http://www.dnsabuseframework.org/>