Tucows' Tiered Access

Background, Data and the way forward



June 2018

"which is more important for society: protecting millions of people from spammers, scammers and copyright trolls by limiting the publicly-available Whois data, or making it easier for security researchers to track down online criminals by using that same Whois information?"

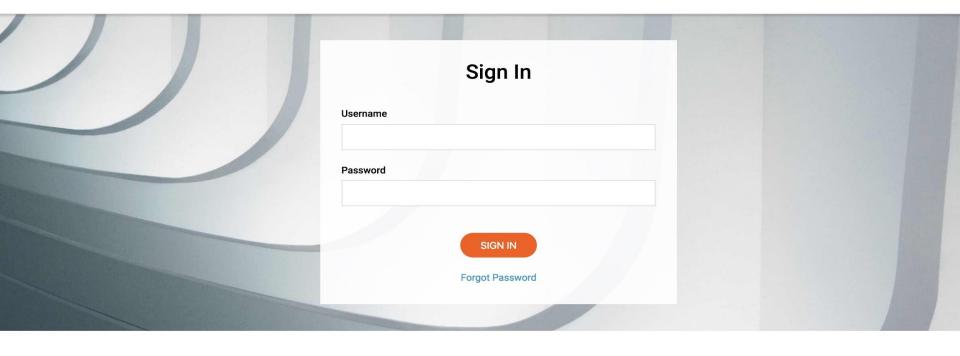
https://www.techdirt.com/articles/20180531/06500839947/icanns-pre-emptive-attack-gdpr-thrown-out-court-germany.shtml







TIERED ACCESS



What is Tiered Access?

TieredAccess.com allows accredited, authenticated users with a legitimate interest to look up registration data (Whois info) for domains on the Tucows platform. Results may vary depending on the tier that the user can access.

How is access granted?

Tucows will ensure that only those with legitimate purposes, including law enforcement, intellectual property, and commercial litigation interests will have access to domain registrant information.



70% renewal rate

2.5%/month

After 1 year 70% accurate

After 2 years 50% accurate

After 3 years 35% accurate







Domain Name Expiration Notice

Call us toll free at 1-866-434-0212 24 hours a day or visit us at www.droa.com

Domain Name(s):

Reply Requested By:

June 27, 2011

As a courtesy to domain name holders, we are sending you this notification of the domain name registrations that are due to expire in the next few months. When you switch today to the Domain Registry of America, you can take advantage of our best savings. Your domain name registrations will expire on October 8, 2011. Act today!

You must renew your domain name to retain exclusive rights to it on the Web, and now is the time to transfer and renew your names from your current Registrar to the Domain Registry of America. Failure to renew your domain name by the expiration date may result in a loss of your online identity making it difficult for your customers and friends to locate you on the Web.

Privatization of Domain Registrations and Renewals now allows the consumer the choice of Registrars when initially registering and also when renewing a domain name. Domain name holders are not obligated to renew their domain name with their current Registrar or with the Domain Registry of America. Review our prices and decide for yourself. You are under no obligation to pay the amounts stated below, unless you accept this offer. This notice is not a bill, it is rather an easy means of payment should you decide to switch your domain name registration to the Domain Registry of America.

Term	Period Covered	Price
1 year	Until Oct 8, 2012	\$35.00
2 years (Recommended)	Until Oct 8, 2013	\$60.00 (save \$10)
5 years (Best Value)	Until Oct 8, 2016	\$105.00 (save \$55)

The following names are currently available for you to register and secure, protecting your domain name from being duplicated.

Other Available Domains	Period Covered	Price
	2 Years	\$60.00 (save \$10)
	2 Years	\$60.00 (save \$10)
	2 Years	\$60.00 (save \$10)
	2 Years	\$60.00 (save \$10)

Hease detach this stub and include it with your payment. Theck the appropriate boxes of the Domain Names you would like to order.	Available Domain Names (optional)
1 Year \$35.00 🗆	2 Year\$60.00
2 Year\$60.00 ☐ 5 Year\$105.00 ☐	2 Year \$60.00 □
1 Year\$35.00 ☐ 2 Year \$60.00 ☐	2 Year \$60.00 □
5 Year\$105.00 □	2 Year \$60.00 ☐ Total Amoun
	Please print your domain name on your check. If paying by credit card, please enter your information below
	Card Number:
	Expiry: /
You must provide a valid email address to complete your renewal	Signature

The "disclosure" on this fake domain renewal notice is hilarious

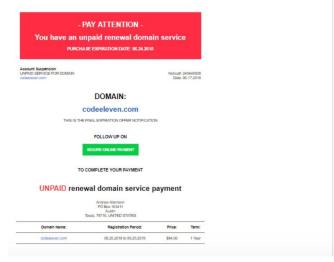
BY ANDREW ALLEMANN — JUNE 22, 2018 POLICY & LAW P 0 COMMENTS

Senders of misleading email specifically disclaim that it's misleading.

Domain Name Wire readers have surely received lots of fake renewal notices telling them they must pay or lose their domain name. Or, at least mislead them into thinking that.

This all ends up in my spam folder, but when I was clearing out that folder this week I decided to open one of the emails. I read the tiny fine print at the bottom and it gave me a laugh.

Here's the email:











TO ROBO-CALLS!



Billions of dollars

Millions of hours

Billions of dollars Millions of hours @2.5%/month!

And you may ask yourself, "Well, how did I get here?"

150,000,000+ gTLD records, each requiring collection of "Personal Data," with sharing of "Personal Data" on widespread basis, typically cross-borders.

Publication of "Personal Data" in the clear for anyone to see, collect, and store.

Status quo Domain Name System was substantially and obviously non-compliant with evolving privacy law, notably including GDPR.

Customers already felt this - as registration of a new domain typically was met with offers for services.

Tucows has multiple business lines. Domains only unit that published personal data in the clear. Cellular, Fiber, Hosting required subpoenas.

Changes to data collection, sharing, and publication were required by law.

Publication now limited, but sharing allowed for "legitimate interest."

Current Public Whois Output

Standard Domain

```
Registrant Name: Data Protected Data
Protected
Registrant Organization: Data
Protected
Registrant Street: 123 Data Protected
Registrant City: Toronto
Registrant State/Province: ON
Registrant Postal Code: M6K 3M1
Registrant Country: CA
Registrant Phone: 1.0000000000
Registrant Phone Ext:
Registrant Fax: 1.0000000000
Registrant Email:
```

noreply@data-protected.net

Whois Privacy-Protected Domain

```
Registrant Name: Contact Privacy Inc.
Customer 0000000000
Registrant Organization: Contact
Privacy Inc. Customer 0000000000
Registrant Street: 96 Mowat Ave
Registrant City: Toronto
Registrant State/Province: ON
Registrant Postal Code: M6K 3M1
Registrant Country: CA
Registrant Phone: +1.4165385457
Registrant Phone Ext:
Registrant Fax:
Registrant Email:
domain.tld@contactprivacy.com
```

Removal of Privacy

- Notice of suit/UDRP
- Reasonable belief of wrongdoing from named party

The membrane must become more permeable

No WHOIS Access Required

- Certificate Authorities: Can use other methods to (TXT records) to confirm domain name ownership.
- Domain Investors: Shortly, we will offer Whois Publicity for those who wish to have their information public.
- Registrars: New transfer procedure as recommended by Tech Ops does not require whois records.
- Pre-UDRP Data Requests: We will confirm the whois information with the panel.
- Phishing already dealt with productively outside the Whois.

TACO Request

- Different classes of service
- Need to identify yourself
- Reasons provided that you are willing to attest to
- Need to establish agency
- Transparency and reporting; you might lose your credentials! Or more!
- This is all worst for the security community

