

Senators,

Below please find InMotion Hosting, Inc.'s ("IMH") responses to your questions. Our responses are as of the date of this email.

1. *What steps do you take to ensure that entities seeking to register domain names are legitimate, and not cybercriminals or other malevolent actors? Which, if any, of these steps have been added since the onset of the coronavirus pandemic?*

It is important to understand from the outset that it is essentially impossible for IMH (or for that matter any web host) to "ensure" the "legitimate" registration of any domain name. On top of that we do not have access to criminal records to determine if a potential customer is a "cybercriminal" or "other malevolent [or bad] actor[]." In most cases, IMH is typically informed of some "bad" or "illegal" conduct occurring on a website in which IMH will typically shut the site down or depending on the content will work with local and/or federal law enforcement agencies to address any issues.

Generally and to the extent information is available (coronavirus pandemic or otherwise), when a new order is placed with IMH, we attempt to cross reference the submitted IP address with a physical address, cross reference the submitted telephone number within country of physical address, and cross reference the submitted email address and review the proposed domain.

With respect to cross-referencing an IP address with a physical address, we look to see if each is within 1000 miles of one another. Naturally, geolocations are never 100% accurate.

Moreover, VPN tunneling generally cannot be detected. We also check the IP Address within our internal system to determine if the potential customer was a former customer. If so, we can determine if they were a "good" customer or not.

With respect to cross referencing of a telephone number within the country of the submitted physical address, we understand that customers are not located in one spot and, due to VPN tunneling, cellular telephones and "online" numbers, each can take their numbers wherever they may be physically located.

With respect to email addresses referencing, we conduct Internet and social media searches.

With respect to domain registration, we check to see the registration of the history of the domain (if any) (i.e., WHOIS lookup). We also look to the history of any website using the domain.

We also interact with the customer. Once we have reviewed the order and the initial information is documented, if we believe a call is needed, we reach out to the customer. We document call times, which may allow us to determine locales. Our staff has access to all notes (which they can add to), which provides each with data if ever needed.

If we suspect suspicious conduct, we reach out to the customer. In some instances, we may request a copy of the customer's identification.

In light of the coronavirus, we have added several "watchwords" to our list of red flags which would invoke additional questions to the customer .

- 2. What additional steps, if any, do you take to ensure that entities seeking to register domain names that contain coronavirus-related terms, such as "coronavirus," "covid," "pandemic," "virus," or "vaccine," are legitimate, and not cybercriminals or other malevolent actors?***

See our responses to Question #1.

- 3. What additional steps, if any, do you take to ensure that entities seeking to register domain names that reference drugs touted as potential treatments for the coronavirus, such as "remdesivir," "chloroquine," "hydroxychloroquine," "Plaquenil," "azithromycin," "metformin," "favipiravir," "interferon," "lopinavir," "ritonavir," or "arbitol," are legitimate, and not cybercriminals or other malevolent actors?***

See our responses to Question #1.

- 4. What additional steps, if any, do you take to ensure that entities seeking to register domain names that reference Zoom, Google Classroom, Microsoft Teams, or other online communications platforms are legitimate, and not cybercriminals or other malevolent actors?***

See our responses to Question #1.

- 5. What steps do you take on an ongoing basis to ensure that registrants are not using their registered domains for unlawful or harmful activity?***

We do not proactively monitor accounts. Such activities remove us from the web host safe harbor legal protections.

- 6. What are the penalties for registrants found to be using their registered domains for unlawful or harmful activity?***

The penalties depend on the severity of the activity(ies). Generally, the site would be suspended. Depending on the content, we also back-up the questionable data.

7. What steps do you take to cooperate with law enforcement when registrants are suspected of using their registered domains for unlawful activity?

We fully cooperate with all law enforcement agencies.

8. Since the start of 2020, how many applications have you received for domain names that contain coronavirus-related terms, such as “coronavirus,” “covid,” “pandemic,” “virus,” or “vaccine?” How many of these domain names have you registered? Please provide this information broken down on a monthly basis.

Month/Year	Domains Requested	Domains Registered
January 2020	1	1
February 2020	11	10
February 2020	73	71
April 2020	16	16

9. Since the start of 2020, how many registrations for domain names that contain coronavirus-related terms, such as “coronavirus,” “covid,” “pandemic,” “virus,” or “vaccine,” have you suspended, cancelled, terminated, or referred to law enforcement? Please provide this information broken down on a monthly basis.

Year/Month	Status	Domains Requested	Domains Registered
January 2020	Canceled	1	1
February 2020	Voided	1	0
February 2020	Active/Approved	6	6
February 2020	Suspended	4	4
February 2020	Voided	1	0
February 2020	Pending	1	0
February 2020	Active/Approved	68	68

February 2020	Suspended	3	3
April 2020	Active/Approved	15	15
April 2020	Suspended	1	1

10. Since the start of 2020, how many applications have you received for domain names that reference drugs touted as potential treatments for the coronavirus, such as “remdesivir,” “chloroquine,” “hydroxychloroquine,” “Plaquenil,” “azithromycin,” “metformin,” “favipiravir,” “interferon,” “lopinavir,” “ritonavir,” or “arbitol?” How many of these domain names have your registered? Please provide this information broken down on a monthly basis.

None.

11. Since the start of 2020, how many registrations for domain names that reference drugs touted as potential treatments for the coronavirus, such as “remdesivir,” “chloroquine,” “hydroxychloroquine,” “Plaquenil,” “azithromycin,” “metformin,” “favipiravir,” “interferon,” “lopinavir,” “ritonavir,” or “arbitol,” have you suspended, cancelled, 4 terminated, or referred to law enforcement? Please provide this information broken down on a monthly basis.

None.

12. Since the start of 2020, how many applications have you received for domain names that reference Zoom, Google Classroom, Microsoft Teams, or other online communications platforms? How many of these domain names have your registered? Please provide this information broken down on a monthly basis.

None.

13. Since the start of 2020, how many registrations for domain names that reference Zoom, Google Classroom, Microsoft Teams, or other online communications platforms have you suspended, cancelled, terminated, or referred to law enforcement? Please provide this information broken down on a monthly basis.

None.

If you have additional questions, please contact us.

InMotion Hosting Legal Admin Team