IN SEARCH OF AMORAL REGISTRARS:

Content Regulation and Domain Name Policy

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Abstract

Should domain name registrars have the right to cancel a domain because they don't like the content of the website it supports? How many registrars' terms of service contracts give them this right and how many don't? Should ICANN's Registrar Accreditation Agreement ensure registrar neutrality, or is competition sufficient to protect users' rights? This paper makes an empirical and conceptual contribution to the debate over domain name policy and Internet content regulation. We examine the Terms of Service from 74 ICANN contracted parties who operate more than 2,300 domain name registrars to find out how many have "morality" clauses of the sort that knocked the *Daily Stormer* off the Internet. We find that registrars with morality clauses in their ToS, or an operational equivalent, comprise around 59% of registrars and account for approximately 62% of the domain name market. We go on to analyze and discuss the role of private actors in governing the Internet, seeking to define a clear and principled position regarding content regulation by private actors and the role of ICANN.

In Search of Amoral Registrars

Introduction

Like many other Internet companies, domain name registrars are often under pressure to regulate online content. Most commonly it is copyright or trademark owners asking registries or registrars to take down domains because of allegedly infringing content they point to without legal due process. But registrars are sometimes also expected to take down domains on the basis of objectionable ideas.

This longstanding Internet governance issue exploded into global view recently. After a white supremacist protest in Charlottesville Virginia led to the murder of a counter-protester, the neo-Nazi *Daily Stormer* published repugnant, hate-filled content about her on its website. This provoked numerous Internet service providers to terminate the *Daily Stormer*'s services for a variety of alleged Terms of Service (ToS) violations. The publication was deserted by domain name registrars, DNS proxy services, a DDoS mitigation service and a hosting provider.

Many people cheered these actions. It can be seen as an example of how the Internet's private actor-driven governance model responds to problems on the web. On the other hand, denial of service by registrars based on the content of a website is a clear deviation from the principle of network neutrality. A private provider of internet infrastructure is withholding or terminating service based on the fact that they don't like the content or opinions of the user. While the suppression of neo-Nazi speech may not bother most of us, the same freedom to deny service based on content could be used against other forms of controversial expression. Many feel that it's not the business of Internet infrastructure service providers to have a decisive role in moderating content.

In Internet governance, it's the Terms of Service (ToS) that matter. In the Charlottesville case, domain registrar market leader GoDaddy justified its cancellation of the *Daily Stormer*'s domain because its ToS gives it the right to cancel a domain used for "morally objectionable" activities. One could argue that there is sufficient competition in registrars and their policies so that unpopular sites can always find a domain, but is there? How competitive is the market for domain name registrars, and how much variation is there in their Terms of Service? How many of the competitors have open-ended "morality" clauses, as opposed to those who rely more on the rule of law to cancel domain service? More broadly, what are the free expression implications of empowering private actors to deny service? Are such actions an appropriate way for society to advance free association and free expression, or do they undermine it?

This paper makes both an empirical and a conceptual contribution to the debate over Internet content regulation. We examine the ToS from more than 70 ICANN contracted parties who operate more than 2,300 domain name registrars to find out how many have "morality" clauses of the sort that knocked the *Daily Stormer* off the Internet. We also analyze and discuss the role of private actors in governing the Internet, seeking to define a clear and principled position regarding content regulation by private actors and the role of ICANN.

What is in those Terms of Service?

Registrar service, i.e., the registration of a domain name at the retail level, is governed by contract. A standard template contract between ICANN and the registrars sets out some basic requirements and policies, and within that framework, each registrar writes its own terms of service that binds their customers (i.e., the registrant).[1]

In the *Daily Stormer* case, GoDaddy informed the *Stormer* that they had "24 hours to move the domain to another provider, as they have violated our terms of service. If no action is taken after 24 hours, we will cancel the service. Given this latest article comes on the immediate heels of a violent act, we believe this type of article could incite additional violence, which violates our terms of service." In fact, GoDaddy's Domain Name Registration Agreement does not specifically restrict using a domain name to incite violence; it includes a much more comprehensive statement, saying it may:

> "...cancel the registration of a domain name...if that name is being used, as determined by GoDaddy in its sole discretion, in association with...morally objectionable activities. Morally objectionable activities will include, but not be limited to: Activities prohibited by the laws of the United States and/or foreign territories in which you conduct business; Activities designed to encourage unlawful behavior by others, such as hate crimes, terrorism and child pornography; and Activities designed to harm or use unethically minors in any way."[2]

GoDaddy clearly acted within its rights, but the stunning breadth and discretionary nature of its "morally objectionable" clause should give registrants engaged in legitimate online expression serious pause. Lots of people think lots of different things are immoral or objectionable.

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[1] Section 3.7.7 of ICANN's Registrar Accreditation Agreement (RAA) specifically requires the registrar to sign registration agreements with the user/registrant.

[2] https://www.godaddy.com/agreements/ShowDoc.aspx?pageid=reg_sa

The case of Google, which also cut off the *Daily Stormer*, is more complex. A registrant using Google Domains as a registrar is bound by one primary ToS, but might be impacted by many other Terms of Service and policies. The central document is the Google Domains Domain Name Registration Agreement. Regarding the use, suspension and cancellation of a Registered Name, the Registrant agrees, among other things, that:

> "4. registering or directly or indirectly using the Registered Name will not violate any applicable laws or regulations, legal rights of others, or Google's rules or policies including:
>
> - engaging in spam, phishing, or other deceptive practices;
> - distributing malware or other items of a destructive or deceptive nature; or
> - allowing child sexual abuse imagery or other exploitation of children."

There is also a part of the contract which says:

> "SUSPENSION AND CANCELLATION. Google may in its sole discretion, suspend or cancel Registrant's Registered Name registration (a) if Registrant breaches this Agreement (including a breach of any of the representations and warranties in Section 7); (b) to comply with a court order or other legal requirement; (c) as required by ICANN, a Registry Operator, or law enforcement; (d) to protect the integrity and stability of the Services; (e) if there was an error in the registration process for such Registered Name, or (f) if Registrant's Account is disabled or terminated."[3]

The Google conditions are much more circumscribed than GoDaddy's, although perhaps there is ambiguity around which "Google's rules or policies" are applicable, and whether or not "legal rights of others" were implicated. Does this mean, for example, individuals protected by hate speech laws in other countries? However, when using Google Domains service, other ToS are potentially implicated. One needs a Google Account to use the Google Domains service, and that has its own ToS. Google's other services do have policies that restrict some content. E.g., Youtube's ToS and by reference its Community Guidelines explicitly restrict hateful content, content which incites violence, etc. Whether or not there is an explicit link between use of Google services, is not entirely clear. If you violate Youtube ToS, for example, does that also impact your use of other services? So despite statements by Google that they were "cancelling *Daily Stormer*'s registration with Google Domains for violating our terms of service," it is not obvious that there were any Google Domains policies that justified terminating the *Daily Stormer* domain.

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[3] https://payments.google.com/payments/apis-secure/get_legal_document?ldo=16267419166080200835&ldt=domainstos&ldr=ZZ&ldl=und

Data analysis of ToS

These two examples of major registrar ToS's and their actions in canceling domains for content raise interesting questions. How many of the thousands of domain name registrars out there have morality clauses like GoDaddy's, and how many rely more on the rule of law to take down domains? How concentrated is the market for registrar services in either type of registrar? Do consumers have robust choices if they want to avoid potentially arbitrary morality clauses? In this section, we present data gathered from examining the ToS of over 70 ICANN-contracted registrars, which together account for 90% of all gTLD domain registrations worldwide.

ICANN publishes data on domain names registered per gTLD grouped by the registrar "IANA id", which is assigned by ICANN and uniquely identifies the registrar.[4] As of June 2017, there were 195,650,709 domain names registered associated with 2,930 different IANA ids. 2,894 ICANN accredited registrars manage 194,625,933 of those domain names. We identified registrars that had more than 250,000 domain names registered, totaling 74 registrars managing 175,166,918 domains or 90% of the market. For each registrar, we collected the registrar name, year of their accreditation agreement with ICANN, and country of location as identified by ICANN.[5] In addition, we collected each registrar's ToS, or "domain name registration agreement" between the registrar and a registrant or user, from their website. For each ToS that we collected, 68 in all, we identified the contracting party and coded the text of the ToS to indicate whether or not it included a morality clause.[6]

In reviewing the ToS, we determined that the language used may prohibit numerous types of activities (e.g., bigotry, derogatory statements, harassment, prurient behavior, etc.) that may or may not be considered immoral and/or illegal depending on perspective, jurisdiction or other factors. Given this, we first identified a morality clause by looking at the specific use of the term "moral" within or referenced by the acceptable use and material breach sections of the contract. We found the ToS of 26 registrars using the term "moral" in some manner, ranging from prohibiting use of the domain that is "contrary to" or "violates good morals", or requiring that the domain or content found at the domain "must comply with...social public morals" or

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[4] Monthly registry reports available at https://www.icann.org/resources/pages/registry-reports. The registry for IANA ids is available at https://www.iana.org/assignments/registrar-ids/registrar-ids.xhtml#registrar-ids-1.

[5] Available at https://www.icann.org/registrar-reports/accredited-list.html.

[6] We were unable to obtain ToS for 6 registrars, five based in China and one in Singapore, given that the registrar required pre-registration as a "member" to view the ToS.

"good morals", to the most frequently found restriction of domain name use in "morally objectionable activities". These ToS were being used by 26 registrars who are responsible for managing 100,164,255 domain names in total. This accounted for 57% of the domain names registered within the market segment we studied.[7]

Table 1: Registrars and domain name registrations by ToS

	Registrars w/more than 250K domain names (90% of entire market)			
Terms of Service	Registrars	% of Total	Domain names	% of Total
Morality clause	26	35.14%	100,164,255	57.18%
Sole discretion or morality clause equivalent	18	24.32%	8,903,236	5.08%
Rule of law	24	32.43%	50,348,264	28.74%
(not examined)	6	8.11%	15,751,163	8.99%
Total	74	100.00%	175,166,918	100.00%

Another 18 registrars did not include overarching morality clauses but had operational equivalents. One approach uses a "sole discretion to terminate" clause. Typically, these clauses are limited in when the registrar can apply their discretion to terminate (e.g., has unlawful activity been committed). However, one registrar's ToS did not qualify its sole discretion clause at all, simply stating: "you agree that we may, in our sole discretion, delete or transfer your domain name at any time."[8] This registrar managed nearly 760,000 domain names. Another qualitatively different, but operationally equivalent approach forgoes an overarching morality clause and attempts to define specific activities that could trigger cancelation. These activities may or may not be illegal, depending on the registrar's and/or registrant's jurisdiction. Some examples of terms describing these prohibited activities include: "discriminatory", "offensive", "obscene", "profane", "derogatory",

[7] Some contracting parties named in examined ToS actually own, operate, provide backend registry services, or in some other way are affiliated with multiple ICANN accredited registrars. For example, Web.com, Inc. is the contracting party for two registrars managing over 250,000 domain names, including the fourth largest (in terms of names managed) registrar, Network Solutions, Inc., as well as 465 other smaller registrars which use the same ToS. Appendix A takes this into account, comparing the market segment we studied to the entire market. The numbers across the categories appear to remain roughly the same, even without knowing the distribution of unexamined registrars.

[8] https://www.dreamhost.com/legal/domain-registration-terms/

"vulgar", "racist", "homophobic", "ethnic", "xenophobic", "harmful", "threatening", "objectionable", "inappropriate", "sexual", "nude", "pornographic" (not "child pornography"), "political", "terrorist", etc.

If we combine together the eighteen ToS using the above approaches, we find that they were responsible for managing 8,903,236 domain names or 5% of the market segment we studied. Together, the above registrars, along with registrars having morality clauses in their ToS, comprise around 59% of registrars and account for approximately 62% of the domain name market.

Unlike the registrar ToS categorized above, the remaining ToS we reviewed only prohibited use of the domain name with activity that was for unlawful purposes or illegal activities, or infringed upon the legal rights of a third party, or did not comply with or violated any applicable laws, rules, or regulations. Twenty-four (24) registrars, approximately one third of the total we studied, utilize this type of ToS, and manage 50,348,264 domain names or 29% of the top 90% of the market.

Categorizing these registrars by their country of registration shows some geographic trends in the data. Most strikingly, other than China and Hong Kong, not a single "rule of law" registrar in our market segment is registered in Asia or Oceania. As expected, many of the registrars in the market segment are in the US. In fact 28 of the 74 registrars, that is 38% of the registrars are registered in the US. Of those 28, only 11 (40%) are "rule of law", which is close to the overall average of 32%. Europe is similar to the US, with 9 of the 22 registrars (41%) relying on the rule of law for content policies. Asia and Australia are by far the most "restrictive" regions, with only 3 of the 18 or 17% of registrars relying on the "rule of law". Figures 1 and 2 provide a heat map of the country of registration for these registrars[9].

[9] See Appendix Table 3 for a full breakdown of registrars by country of registration

Figure 1: Rule of Law Registrars

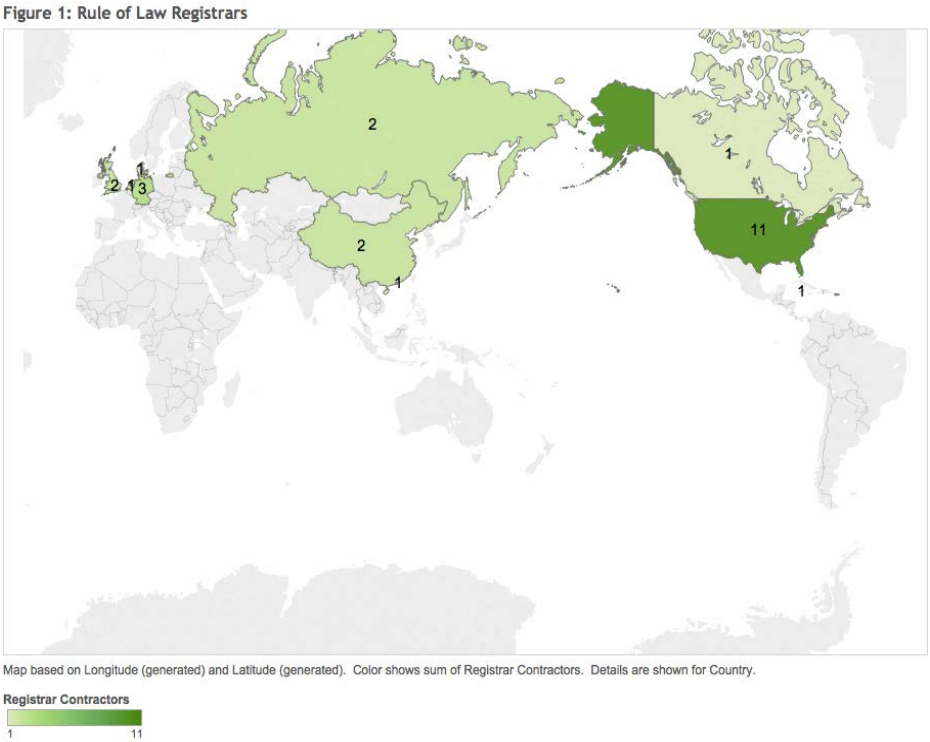
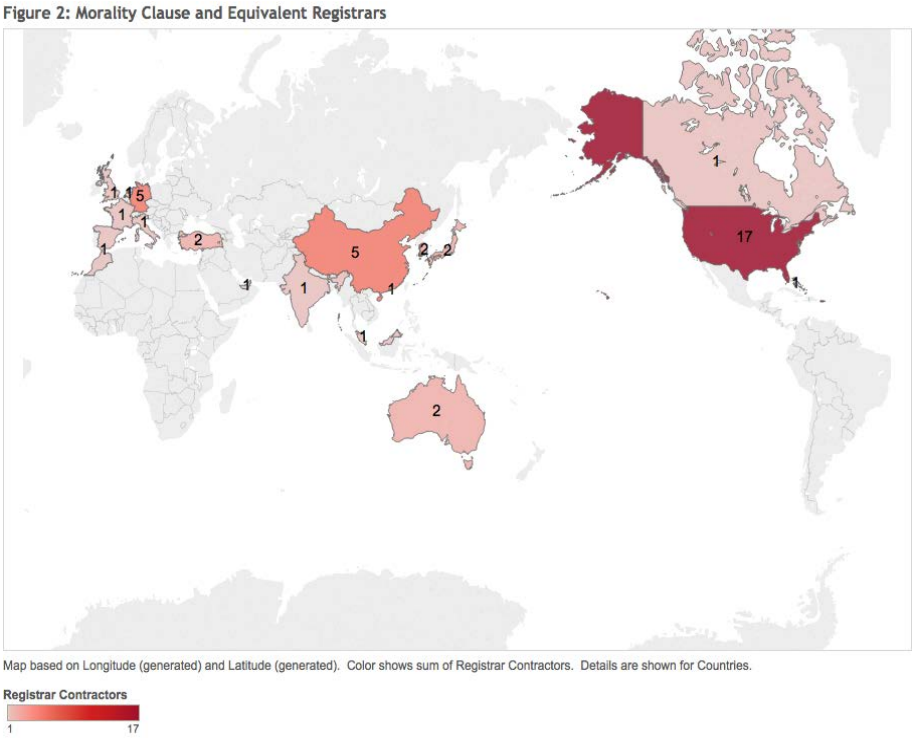


Figure 2: Morality Clause and Equivalent Registrars



The role of private actors in content regulation

The variation in registrar contracts reveals two different approaches to domain name governance, which we will label the "registrar discretion" approach and the "rule of law" approach. Contracts that facilitate **registrar discretion** preserve the right of a registrar to take down a domain name according to their own opinion of the content it supports. Contracts following the **rule of law** approach are intended to give registrars the right to cancel or suspend a domain to comply with a court order, a law enforcement agency, or other legal requirements. The registrar is largely agnostic about content, and takes down a domain only when requested to do so by formal legal standards and processes. Weighing the merits of the two approaches, there are things to be said for both approaches.

The pro-discretion case

Registrar discretion over what content the domain supports might be considered a legitimate exercise of the business owners' freedom of association and risk management. Discretion also gives registrars the ability to respond more rapidly to perceived problems, especially in a multi-jurisdictional context, because they don't need to wait for legal process or figure out which law applies. Arguably, such clauses might also protect registrars from secondary liability for the unpopular or objectionable activities of their registrants. They can respond quickly to any political pressure from the public or governments by simply terminating the domain, and their customers won't be able to sue because they effectively have no rights.

The anti-discretion case

The most obvious drawback of registrar discretion is that it affords consumers little protection and limits the parameters of free expression on the Internet. Unpopular speech can simply be taken down for no reason other than its unpopularity, even if it is legal. Things that may not be illegal can also be taken down with impunity. With regard to website content, for example, whatever becomes the target of popular outrage or official disapproval at any given moment can be silenced. Discretion tends to reinforce the link between domain name policy and Internet content regulation, which has some potentially dangerous consequences if extended to the level of ICANN (see next section). In general, discretion disempowers the consumer, who can be subject to quick and arbitrary actions with little to no recourse.

Furthermore, one could argue that the business need for or benefits of discriminating against certain kinds of content are very weak in the registrar industry. Domain name registrar services are behind-the-scenes and infrastructural in nature. No one blamed Verizon or NTT for transporting the *Daily Stormer's* packets, just as no one blamed GoDaddy for the existence of its website. People do not associate the content of websites or emails with the registrar of the domain

name. This is not true of YouTube and Facebook, whose brands are directly associated with the content of their videos and feeds. In social media it is the platform provider who displays the content, and thus the platform may suffer reputational damage by carrying content that is perceived to be objectionable; more importantly, their users might not want to be exposed to it. Thus, one of the stronger justifications for private actor discretion - the desire to maintain a better reputation and to maintain an environment that is appealing and comfortable to users - is completely absent in the case of registrars. A registrar's other customers are not visibly associated with a domain name registration that supports objectionable content simply because they share the same registrar.

The importance of competition

In the distribution of costs and benefits, discretion favors the registrar at the expense of the registrant (consumer), while the rule of law approach favors the consumer. In weighing these two approaches, the level of competition looms large. If consumers have choices between many active competitors, then the registrars are less likely to make arbitrary and harmful use of their discretion, regardless of what's in their ToS, and thus their discretion matters much less. Competition, proper notification and ease of portability across providers would make the owner of a registrar pay for arbitrary cancellations with a rather pointless loss of market share. For example, if there is a registrar who refuses or cancels domains that support web sites that publish pictures of onions and onion recipes because the registrar owner is sickened by onions, this would not constitute a significant threat to free expression as long as competition is robust. Onion-loving users could easily avoid this registrar and find another. The competition effect probably explains why, despite the prevalence of morality clauses in ToS, their use has been confined to a few high-profile cases in which the victim of cancellation was considered repugnant to most people. (Unfortunately, this study lacked the time and resources to collect empirical data on how often domain names are taken down based on discretionary contracts.)

Our calculations show that the registrar market on a global basis is competitive, with a Herfindahl-Hirschman index (HHI) of 963.[10] The U.S. Department of Justice considers a market with an HHI of less than 1,500 to be a competitive marketplace. If the market is broken down geographically or linguistically, however, competition is not as robust. Our statistics show that most of Asia in particular lacks competitive alternatives.

[10] The HHI index deems a score of 10,000 to be a complete monopoly and a score of 0 to be perfect competition.

The role of ICANN in private actor policing

The tension between the registrar discretion approach to domain takedowns and the rule of law approach shows up at a higher level in the contractual chain, as well. The registrars who have put morality clauses into their Terms of Service are adding an *additional* layer of control. Section 3.18 of ICANN's contract with registrars, the Registrar Accreditation Agreement (RAA)[11], already requires them to respond to charges of illegal or abusive activity involving a domain name.[12] Local or national law could also compel a registrar to take down a domain.

Section 3.18 has turned into a policy battleground.[13] On Trademark, copyright and law enforcement interests are keen to push registrars into the business of enforcement for them. They believe that registrars should respond to reports of illegal activity by suspending the registered name holder's domain name without any formal determination of illegality via governmental due process. Moreover, they want ICANN to exert strong pressure on registrars to do this dirty work by making ICANN terminate registrars' accreditation if they fail to do so. De-accreditation is tantamount to a death penalty for a registrar enterprise, so clearly those interests are trying to leverage ICANN's monopoly on the domain name system root to turn it into a global content regulator with quasi-governmental authority. On the other hand, registrars and advocates of Internet freedom do not want registrars to take down domains based only on abuse complaints. The registrar, they believe, is not the appropriate party to determine whether a registered name holder is engaged in illegal activity. Only legal authorities following due process should be authorized to do this.

While one can argue that there is some merit to registrar discretion, all of those merits disappear when ICANN is imposing uniform requirements on registrars to

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[11] https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en

[12] Section 3.18.1 of the RAA requires registrars to maintain an abuse point of contact to receive "reports of abuse involving Registered Names sponsored by Registrar, including reports of Illegal Activity," and to "take reasonable and prompt steps to investigate and respond appropriately" to any reports of abuse. Section 3.18.2 of the RAA requires each registrar to establish and maintain a dedicated abuse point of contact, monitored 24 x 7, to receive reports of illegal activity by law enforcement, consumer protection, quasi-governmental or similar authorities. It also requires the review of well-founded reports of illegal activity submitted to these contacts within 24 hours by an individual who is empowered by the registrar to take necessary and appropriate action in response to the report.

[13] See Alan Grogan, "Community Outreach On Interpretation and Enforcement of the 2013 RAA," ICANN blog, 11 June 2015. https://www.icann.org/news/blog/community-outreach-on-interpretation-and-enforcement-of-the-2013-raa

take down domains based on the content they support. Registrars are subject to competitive discipline; ICANN is not. Registrars can vary in their approach, responding to different jurisdictions and different consumer preferences; ICANN's RAA is uniform and global.

Registrar neutrality?

The bottom line is that the rule of law approach is better, but the problems associated with the discretionary approach are mitigated by market competition. Since the level of competition could easily decline with the fortunes of the domain name industry, and since the relationship between the regulation of website content and the regulation of domain names remains a tense issue in the ICANN environment, we recommend a shift in direction for ICANN policy.

The ICANN RAA could be amended to protect registrants against arbitrary or discretionary take downs of their domains based on the content of their site. ICANN's RAA could attempt to prevent registrar terms of service from creating an arbitrary ability to take down a domain based on website content. Such a contract provision would not only facilitate the rule of law but relieve political and legal pressure on both ICANN and registrars. An amended RAA fostering registrar neutrality would preserve and protect ICANN's mission limitations,[14] while freeing registrants of potentially arbitrary or censorious action by registrars. Registrar content neutrality would not prevent governments from enforcing their laws, but it would make it clear to the content police that ICANN and the DNS is not the place to go to enforce content regulation policies. A registrar neutrality policy reinforces the important distinction between domain abuse and illegal content, which would clarify the ongoing struggle over efforts to push ICANN outside of its mission limitations.

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[14] ICANN's mission is defined in 1.1.(a)(i) of its bylaws as "Coordinates the allocation and assignment of names in the root zone of the Domain Name System ("DNS") and coordinates the development and implementation of policies concerning the registration of second-level domain names in generic top-level domains ("gTLDs"). In this role, ICANN's scope is to coordinate the development and implementation of policies:

- For which uniform or coordinated resolution is reasonably necessary to facilitate the openness, interoperability, resilience, security and/or stability of the DNS including, with respect to gTLD registrars and registries, policies in the areas described in Annex G-1 and Annex G-2; and
- That are developed through a bottom-up consensus-based multistakeholder process and designed to ensure the stable and secure operation of the Internet's unique names systems."

The mission commitments and core values of the bylaws also contain a specific prohibition on regulating "services that use the Internet's unique identifiers or the content that such services carry or provide, outside the express scope of Section 1.1(a)."

Reforming these contractual provisions will be even more important as the number of cross-border issues rise. We found a number of ToS citing the laws of a specific country or economic zone (EU) that apply to its services. However, as digital data agreements like MLATs and privacy frameworks spawn between countries,[15] it is likely that more countries will start to issue cross-border take down requests.

Conclusions

This paper makes both an empirical and a conceptual contribution to the debate over Internet content regulation. We examined the ToS from 74 ICANN contracted parties operating more than 2,300 domain name registrars to find out how many have "morality" clauses of the sort that can be used to take content off the Internet. We found that 62% of registered domain names are governed by such clauses or their operational equivalent (i.e., registrar discretion), while almost 29% of registered domain names are governed by ToS that rely primarily on rule of law. There is a clear geographic divide, with only 3 top registrars in Asia and Australia relying on rule of law. Internet users in these regions are more likely to be exposed to subjective censorship. This leads us to several preliminary conclusions. Robust competition amongst registrars is likely to mitigate arbitrary and harmful use of their discretion regardless of what's in their ToS. But the merits of competition disappear if ICANN imposes uniform requirements on registrars to take down domains for content related reasons, for instance through Section 3.18 of the RAA. ICANN policy should make a clear distinction between illegal content and abusive domains; in the latter case the domain itself is causing the problem, e.g. through deception, trademark infringement, support for botnet operations, etc. These problems fall within the remit of domain name regulation. But illegal content is not. The ICANN RAA should be amended to protect registrants against arbitrary or discretionary take downs of their domains based on the content of their site.

[15] See - APEC Cross Border Privacy Enforcement Agreement (https://www.apec.org/Groups/Committee-on-Trade-and-Investment/Electronic-Commerce-Steering-Group/Cross-border-Privacy-Enforcement-Arrangement.aspx)

Appendices

Table 2: Comparison of registrars with more than 250K domain names and entire market

	Registrars w/more than 250K domain names (90% of entire market)				Entire market			
Terms of Service	Registrars	% of Total	Domain names	% of Total	Registrars	% of Total	Domain names	% of Total
Morality clause	26	35.14%	100,164,255	57.18%	529	18.28%	101,805,457	52.31%
Sole discretion or morality clause operational equivalent	18	24.32%	8,903,236	5.08%	502	17.35%	8,985,259	4.62%
Rule of law	24	32.43%	50,348,264	28.74%	1,298	44.85%	54,178,298	27.84%
(not examined)	6	8.11%	15,751,163	8.99%	565	19.52%	29,656,919	15.24%
Total	74	100.00%	175,166,918	100.00%	2,894	100.00%	194,625,933	100.00%

Table 3: Country level data

Country	Morality clause	Sole discretion or morality clause equivalent	Sum of columns 1 and 2	Rule of law
Australia	1	1	2	0
Bahamas	0	1	1	0
Canada	0	1	1	1
Cayman Islands	0	0	0	1
China	4	1	5	2
Denmark	0	0	0	1
France	1	0	1	0
Germany	4	1	5	3
Gibraltar	1	0	1	0
Hong Kong	1	0	1	1
India	1	0	1	0
Italy	0	1	1	0
Japan	1	1	2	0
South Korea	0	2	2	0
Malaysia	0	1	1	0
Morocco	1	0	1	0
Netherlands	0	1	1	1
Russian Federation	0	0	0	2
Singapore	0	1	1	0
South Korea	1	1	2	0
Spain	0	1	1	0
Turkey	0	2	2	0
United Arab Emirates	0	1	1	0
United Kingdom	0	1	1	2
United States	12	5	17	11