We just completed an analysis of the actual experience of ICode in Australia. What we learned is that the impact that was desired -- significant reduction of the number of bots in each of the ISPs that participated -- was not gained. The reductions were insignificant. Thus expanding that effort in the United States would, to be credible, need to demonstrate how the US version would get substantial reductions -- 50% would be a sensible target for a national initiative -- in the number of bots.

The simplest addition to the ICode strategy would be a measurement system in which the number of bots in each ISP's address space, is monitored weekly or monthly as a constant incentive. Though challenging, this is not impossible (as the Comcast and other ISP representatives may claim.)

Respectfully submitted.

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