

ccTLD World mailing list: issues

Drafted by: Joke Braeken, 29 November 2018

1 Introduction & background

- The list of subscribers and the potential need to review the ccTLDworld charter is an agenda item on the 6 December ccNSO Council Meeting. This document has been prepared ad background documentation, to allow for an informed discussed.
- The procedural documentation regarding the ccTLDworld mailing list is published here: <https://ccnso.icann.org/sites/default/files/file/field-file-attach/2016-12/cctld-world-list-procedural-doc-08nov16-en.pdf>

2 Review of the procedural documentation: issues spotted

2.1 Eligibility to the list

According to the procedural documentation, the list is open to the following groups:

- ccTLD Managers: administrative contacts and technical contacts of ccTLDs;
- Observers from Regional ccTLD registry organisations, identified by their manager or board;
- The members of ccNSO Council;
- The ccNSO secretariat;
- ccNSO appointed member(s) to:
 - the ICANN Board,
 - Customer Standing Community,
 - Root Zone Evolution Review Committee,
 - Empowered Community Administrative Committee

Issues

1. To be clarified which address by the ccTLD manager can be subscribed. Possible options:
 - a. IANA admin-c
 - b. IANA tech-c
 - c. Primary contact as specified in the ccNSO member database
 - d. Address of the ccTLD's manager's preference
2. The procedural documentation mentions that the members of the ccNSO Council should be subscribed. This is currently not the case. Should the ccNSO-council mailing list be subscribed, or the individual email addresses of the individual ccNSO council members? Note that the RO's and ccNSO appointed ICANN Board members are subscribed to the ccNSO council mailing list as well.

3. The procedural documentation mentions the following: *“A list of subscribers and their affiliation will be published, and publicly available, however it will not include contact details.”*

The only information that is stored in the mailing list database are the email addresses that are subscribed to the mailing list. There is no additional clarifying data, such as affiliation specifications. Due to GDPR requirements, the list of subscribers (i.e. e-mail addresses subscribed) is not to be made public.

2.2 Subscription details

The procedural documentation mentions the following:

“Initially, all parties that meet the eligibility criteria will be subscribed and invited to participate. If a subscriber declines to participate, this subscriber should be enabled to unsubscribe. If a subscriber intends to appoint or include another person, the ccNSO Secretariat should be informed accordingly. After the initial subscription process (after 3 months), any requests to subscribe or unsubscribe should be directed to the ccNSO Secretariat, who will seek any relevant authorisations required for new subscriptions. The ccNSO Secretariat will also consult annually to ensure the subscription list is kept up to date.”

Issues

1. With the GDPR requirements that in the meanwhile came into effect, subscribers need to give their explicit consent for subscription to a mailing list. This type of consent has not been collected to date.
2. Subscribers also need to agree to abide by the ICANN Privacy Policy and the ICANN website Terms of Service.
3. Moreover, subscribers need to be able to unsubscribe at any time: this requirement is being met. It is sufficient to contact the ccNSO Secretariat to have your e-mail address removed from the mailing list.
4. The annual verification as mandated by the procedural documentation has not been conducted since prior to 2016, according to the knowledge of the ccNSO Secretariat

2.3 List Guidelines

No issues spotted here.

2.4 List Archive

The procedural documentation mentions the following:

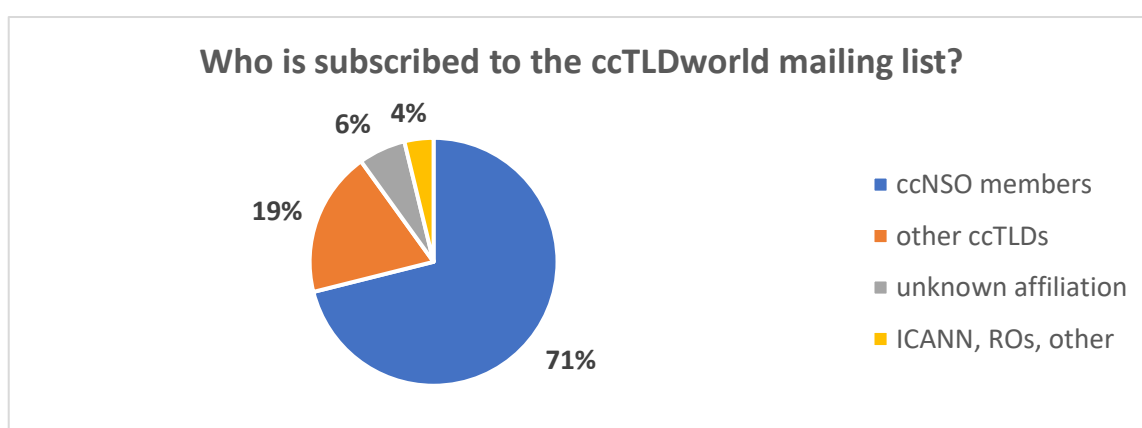
“The archives are updated in real time and are available at: The archives are only available to the subscribers of the list”

Issues

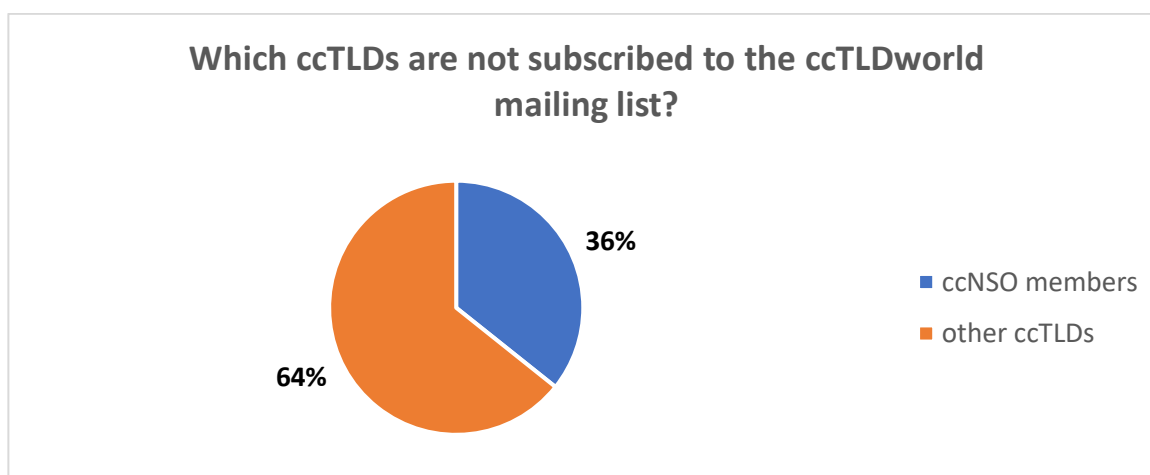
We refer to the GDPR requirements mentioned under 2.2. of this document

3 Review of the mailing list subscriptions: fact-check and issues spotted

150 ccNSO members have subscribed one or more e-mail addresses to the ccTLD world mailing list, and 40 ccTLD managers that are currently (on 29 November 2018) not a member of the ccNSO did the same. There are 13 e-mail addresses subscribed that the secretariat failed to allocate to a ccTLD manager or other type of affiliation. Often these e-mail addresses are generic ones (@gmail, @yahoo etc). The 4 members of the ccNSO Secretariat are subscribed as well, and 3 out of 4 Regional Organisations subscribed one e-mail address. AFTLD did not subscribe to the list. Moreover, LACnic is subscribed as well.



When looking at the total list of ccTLD managers, we noticed that 20 ccNSO members and 36 non ccNSO members did not subscribe any e-mail address to the ccTLDworld mailing list.



37 ccTLD managers have subscribed more than 1 e-mail address to the mailing list. An at-glance verification by the ccNSO Secretariat showed that for some ccTLDs, the e-mail addresses are outdated, with staff members that have left the organisation in the meanwhile.