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"Finally, the WG has concluded that the registrar accreditation model with its multiple steps, governed by the RAA, may not be entirely appropriate for P/P services; however, it is a useful starting point from which relevant portions may be adapted to apply to P/P service providers. The implications of adopting a particular accreditation model will need to be worked out as part of the implementation of its policy recommendations, if adopted." (p.19)	Do you think that ICANN should be examining the same types of information as registrars (financial information, background criteria, understanding of policy and contractual requirements, operational and technical capabilities) when evaluating privacy and proxy service providers?	Chris Pelling: COMMENT: Surely Accredited registrars who are already in good standing with ICANN will not be subjected to this whole process again ?	
		Theo Geurts: when we are looking at these questions, it is pretty important that we have these checks and balances in play here. We need to make sure that these providers have a financial capability, are operational and have technical capabilities. I would say "yes" to answering all these questions.	

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		Chris Pelling: COmment: I would disagree with Theo for already accredited registrars as we are already completing all requirements	
		Theo Geurts--we are discussing issues for accredited registrars later. When it comes to PPs who are new to the game, not affiliated with registrars, they should be subject to this. For Rrs who are already providing PP services, that's a different discussion.	
		Greg DiBiase: +1 to Theo, I agree with this criteria for providers not affilated with registrars	
	Should the screening process be as extensive for Privacy/Proxy as it is for registrars? For registrars, we ask about 60 questions, require detailed technical information, and require long-form paragraph-type answers to questions about policy and contractual requirements.		

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		Theo Geurts--the short answer is yes. What we learned from the registry fly incident--it shows how important it is that this is being pared out in a correct fashion. These third party providers who are maybe new to ICANN ecosystem, they need to understand this is not just something that you take lightly. We take this seriously as registrars, and those who are new to the game need to understand this is pretty serious stuff. This needs to be very strict.	
		Chris Pelling: COMMENT: Essentially a set of questions should be set, maybe not 60, but, registrant information, Escrow requirements (technical), policy information should all be included	
		Alex Deacon: I think it does make sense to leverage the existing Rr accreditation process. It's easier for all involved. I don't think we should duplicate effort here. We should streamline process for those affiliated PP providers but I think we do, for affiliated PPs, to have some sort of PP addendum that specifies that in addition to Rr capabilities they are also seeking similar services for their PP services. I know these are separate orgs but it does make sense that we should be able to streamline so long as we capture the proper legal entities.	

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		Chris Pelling: Comment: I also think as part of the questions, ICANN should make the thje PP service go through a training session, similar to the RAA requires registrars to do so they understand the polices that they will adhere too	
		Theo Geurts--when it comes to questions, it wouldn't make much sense to ask a bunch of questions where a PP would have no operational business or ties (there's definitely stuff in the RAA that is not related to PP). So you wouldn't ask those questions. Focus on the most important questions of operating a PP so you get a clear picture. This co is in the business to get accredited for PP, ask questions to ensure they understand the business they are in, and skip all the unrelated questions.	
	Could ICANN require providers to take a training course and successfully complete it as a condition of obtaining accreditation?	Chris Pelling: Self based - during accreditation	

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		Theo Geurts--several cctlds require technical tests to get accredited and as soon as you past tests they throw an exam your way and you have to answer operational and legal questions; after you finish that, then you become accredited. This is all before accreditation.	Application process=essay plus training and multiple-choice "exam."
		Carlton Samuels: +1 to a training program as the last mile for accreditation	
	Could such training course serve as a substitute for some of the long-form questions that are intended to gauge an applicant's understanding of relevant requirements?	Chris Pelling: COMMENT: Questions leads to URL for training and exam and once all completed to 100% accreditation given questions being the ones we are talking about now	
	Should/could ICANN limit eligibility for an initial application window?	Theo Geurts: When we are looking at streamlining the process, we should already know which Rrs have PPs. If you take those results and incorporate those into the onboarding process you can already take the results and onboard these registrars right away. This leaves enough time to deal with the third party providers. That would be my suggestion.	

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	Would limiting eligibility to Rr-Affiliates raise fairness issues?	Theo Geurts: I don't see any issues here. To be clear, Rrs who offer PP already went through the accreditation process and already have been audited on certain aspects of PP. Onboard all registrars, you have their records, and then focus on new people.	
		Chris Pelling: COMMENT: none whatsoever - +1 to Theo	
		steve metalitz: "Eligibility restrictions" --- other than whether the proider is affilited with a current registrar (which woudl not be a permissible distinctoin for allowing applications, IMHO) -- can Amy or others on staff provide examples?	AB response on call--one possible option would be to move incomplete/inadequate applications to the ongoing application window.
		Carlton Samuels: There should be one and only one accreditation process. These are intended to separate and severable operations. Trust but verify. The only concession is that some one/entity that is already "known" imay have a leg up on trust but same process	

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		steve metalitz: I am skeptical there is as much overlap as Theo and others are stating between what current registrars must provide versus what p/p accreditation applicants must demonstrate they understand. The obligatoins are quite different.	
		Carlton Samuels: @Steve: The obligations are different +1.	
		Roger Carney: I agree with what everyone is saying here. It would be good to get the affiliated ones through. Maybe the guinea pigs of going through the process--these providers have done most of this already so we can vet our process well enough and get any clarifying issues done before introducing it to anyone who is not used to the process. I don't see a fairness issue so long as we are not saying when first group of providers go through, then Compliance gets to hold everyone accountable. That's where fairness becomes an issue. If only affiliated people are through the first group, obviously compliance can't start until a certain period of time after that.	

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		Chris Pelling: @Steve, I am simply saying we as accredited registrars already provide the service, on our audits over the last 6 years, we have had no issues with our service. Therefoie I disagree with your comment (if I read it correctly)	
		steve metalitz: @Chris, but the "service" has not been subject to any requirements from ICANN up to now. With accreditation, this changes.	
		Carlton Samuels: "Affiliated" has a whole universe of meanings! That could mean a separate legal entity from the registrar. Use the KISS rule here!	
		Chris Pelling: most of the "service" that we are doing this IRT over Steve is already implemented by us Chris Pelling: and if it is a simple checksheet of "Do you have X, Y and Z" as a cover then we should be able to push through	
		Volker Greimann: Statement: The accreditation of affiliated p/p applicants should bed baked into their registrar accreditation. There should not be a need for a seperate accreditation	

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		Theo Geurts: We have the requirements that we are forming now and we have the current accreditation requirements (two different topics). So when discussing onboarding requirements, if we apply the same Rr rules and regs then we can already streamline that bc we don't have to go through that process again, we've already gone through it. For new regulations for PP, that is a different process--in the end we will all have to comply with it.	
		Theo Geurts: I can't think of any restriction why you should do that.	AB answered on call. This possibility was asked about because of the practical reality that accrediting all existing providers who apply is going to take a significant amount of time. We are thinking about possible options for expediting the process.
		Volker Greimann: Limited eligibility: Not practicable unless the requirement for registrars to only knowingly accept registrations from accredited entities is also waived until all providers can become accredited.	

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		steve metalitz: Because you should not be dscriminating between affiliated and unaffiliated applicants. Excluding them altogether is clearly discriminatory.	
		Volker Greimann: also note that if there is a cost attached to accreditation, no matter how long the period is going to be there will be a rush at the end. No one will pay for accreditation or submit to these rules unless they have to	AB-There doesn't seem to be significant support for limiting eligibility. Asked IRT to comment if they disagree. No further comments.
		steve metalitz: @Amy, how many affiliated p/p providers have been disclosed to ICANN under the current specification?	We estimate approximately 200
		steve metalitz: @Amy you have not opened up the files that registrars have submitted? How do you know their submissions comply wth the specification?	
		Chris Pelling: COMMENT: VOlker mentioned above that a current ICANN registrar should be given a chitty / voucher for any fees as they are already accredited	We will take this back and discuss/
		steve metalitz: @Amy thanks for clarification. So presumably compliance or whoever has opened the files could provoide an exact answer. Can you ask them?	

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	So, could ICANN ask Affiliated services a more limited set of questions just focused on the new requirements, and ask unaffiliated services the longer set of questions?	Theo Geurts: I would say "No." Compliance already asked us if any employees have criminal records--we already went through accreditation and were audited (even if questions not related they are still being asked on a constant basis). So for those Rrs who already offer those services and are being audited I would say do not ask any additional questions or a subset of limited questions, just onboard those and just vet those who are new to the game. If there are issues with existing registrars, they would already have surfaced and addressed.	
		Alex Deacon: What is an Affiliated Service?	Definition provided in the AC chat.
		Theo Geurts: We as a Rr have affiliated companies that carry out certain registrar functions; regardless of what they are doing, we as a Rr remain responsible for what they are doing	Section 1.3, RAA: "Affiliate" means a person or entity that, directly or indirectly, through one or more intermediaries, Controls, is controlled by, or is under common control with, the person or entity specified.

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	Should applicants that are Affiliated with an ICANN-accredited registrar have a different accreditation process than others?	steve metalitz: Repeating: hat does not means that unafifliated applicants might not be asked to provide more info than affiliaited ones to the extent the latter have already provided it through the RAA accreditatoin or audi t process.	
		Chris Pelling: COMMENT: Amy, ICANN have already started discussing accreditation fees, what has been discussed further to this ? Chris Pelling: per use fee ?	We have not started discussing in detail other than acknowledging that there will be significant costs associated with screening; in the registrar context, the applicant fee is meant to recoup part of that cost. We will be discussing fees internally and with the IRT.