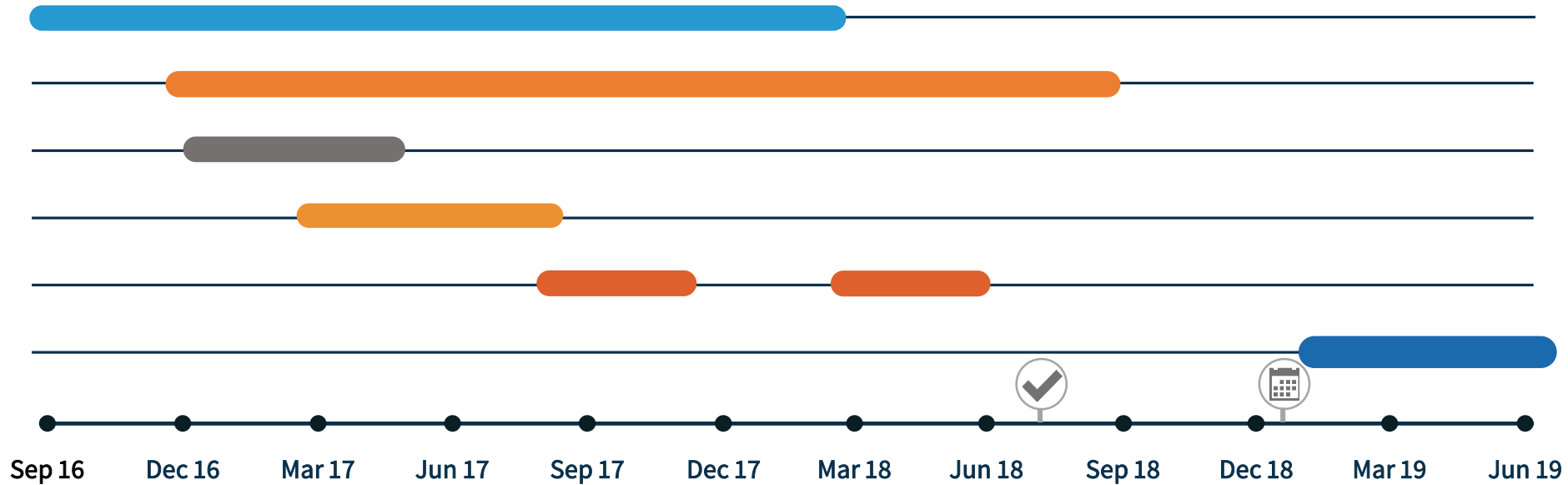


Proposed Timeline: Privacy/Proxy Program Implementation



- Analyze & Design Work With IRT
- Operational Design, Build; Compliance Preparation
- (Internal) Outlining Draft Policy, Contract; First Policy Draft
- (Internal) Contract Drafting
- Public Comment Periods
- Initial Onboarding (could take up to 12+ months)

- ✓ Final implementation announced
- 📅 Proposed effective date—January 2019 (possibly with extended or early onboarding period)

Project Plan Breakdown: Phases 1-5

- Phase 1 (Oct-Dec 16): Framework Review/Signoff
- Phase 2 (Dec 16-Jan 17): Outlining Document Deliverables
- Phase 3 (Jan17-Feb17): Staff Drafting v1 Policy, IRT Discusses Other Topics (WHOIS labeling, etc)
- Phase 4 (Feb-July 17) IRT Work on Policy
- Phase 5 (Aug-Sept 17) Public Comment Period 1 (Policy)

Project Plan Breakdown: Phases 6-10

- Phase 6 (Oct-Dec 17): Refine Policy Based on Comments; Discuss Onboarding, Metrics
- Phase 7 (Jan-Feb 2018): Public Comment Period 2—Full Program (Updated Policy + Contract)
- Phase 8 (March-May 18): Refine and Finalize Based on Public Comments
- Phase 9 (June 18) Announce Final Implementation and Effective Date
- Phase 10 (July-Dec 18): Operational Preparedness