Introduction:

In consolidating the data elements matrix based on the data elements contained in each of the Purpose workbooks, the support team encountered the following issues / inconsistencies. For each of those, a proposed path forward is described. If there are any concerns about these proposed solutions, please indicate this in advance of Thursday's meeting so it can be discussed during the call.

Please scan the Data Elements Matrix_20181107.pdf before reviewing the issues. There are three pages as viewed from the Responsible Party:

- Collection of data from the Registrar (page 1)
- Transfer of data from the Registrar to the Registry (page 2)
- Disclosure of data to Internet Users (page 3)

Each column is an extract of the data elements identified within each of the Purpose workbooks. The field is similarly marked as "1" for Required, "(1)" for Optional or "-" for Not Selected[1]. The Collection Logic column on the far right with (Green, Yellow, Red) contains a conditional formula where it detects a data element marked as Required "1" (Green) or Optional "(1)" (Yellow). If so, this column reflects the comprehensive data elements for that Processing Activity by Responsible Party.

Issues:

1. Purpose M – Dispute Resolution

Issue: The Purpose M data elements workbook includes a number of data elements required for transfer from Registrar to Registry that the original small team that developed Purpose M put in with a question mark as it was not clear whether or not data gets transferred from a registrar to a registry for UDRP or URS. In a subsequent discussion, the ICANN Contractual Compliance team indicated that this transfer from registrar to registry is not required for the purpose of UDRP or URS.

Question for the EPDP Team:
- In post-May 2018 operation, is the Compliance Team assessment correct, or is data transfer to the Registry for UDRP and/or URS required, and if so, why?
- If the Provider always contacts the Registrar for the disclosure of registration data, both in the case of UDRP and URS, can the transfer of data from registrar to registry (M-PA3 in the data matrix) for this purpose be removed?
- For PDDRP, RDDRP complaints where registration data is required to be disclosed and considered PII, can the access to that data be accomplished via the Registrar as needed?

Proposed approach to address the issue: Remove the Processing Activity M-PA3 Transfer from Registrar to Registry within the Purpose M workbook.

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[1] Optional for the RNH to provide. (Note, the EPDP Team is still considering whether optional also means optional for the registrar to offer the ability to the RNH to provide these data elements, or whether it would be required for the registrar to offer this ability)

2. Purpose E – Registry Escrow

Issue: During the previous meeting, the EPDP Team discussed that for the purpose of Registry Escrow, data elements would need to be escrowed that would be transferred from Registrar to Registry. However, based on a review of the data elements matrix (and presuming a resolution of the previous issue), it means that only the "Domain Name" and "Name Servers" field is required for transfer by registrar to registry. Is this sufficient from the perspective of Registry Escrow (factoring in that non-personal data elements will be publicly available)? If not, why not?

Question for the EPDP Team, and especially Registry reps:
- What data elements, if any, are needed to be escrowed in addition to those data elements that are recommended to be publicly available to restore registry operations in case of failure?

Proposed approach to address the issue: if additional data elements are identified beyond those publicly available, these should be marked as needing to be transferred for the purpose of escrow from registrar to under Purpose A.

If no additional data elements are identified, no further action is needed.

3. Optional Data Elements

Issue: There are some inconsistencies in the use of the term "optional" for some of the data elements. I.e., in Purpose B (Access by Third Parties), the tech contact email is not marked as optional. Our understanding is that purpose A (Rights of a Domain Registrant) and C (Tech Contact) provide the baseline for describing which elements are optional.

Proposed approach to address the issue: Ensure that the use of optional for all data elements for all purposes is consistent with Purposes A and C., i.e., that Tech Contact is indicated as optional.   .

4. Collected vs. Generated Data Elements

Issue: The current consolidated list of data elements does not distinguish between data elements that are collected and data elements that are generated, e.g., Registry Domain ID and Registry Registrant ID. Similarly, some of the generated data elements are no longer listed as being needed / required; however, there are RFCs that currently require this information to be generated for a variety of purposes and so should be addressed in our analysis.

Question for the EPDP Team:
- Which of these, if any, contain potential Personally Identifiable Information?

Proposed approach to address the issue: Add a clarification to the data elements workbooks that the workbook includes data elements that are collected from the registrant and data elements that are automatically generated by the registrar and/or registry. For Purpose A, indicate that currently known generated data elements, Registry Domain ID and Registry Registrant ID, will continue to be generated and contain Personally Identifiable Information (with these data elements being redacted, consistent with the current requirements in the Temporary Specification).