Dear All,

I hope everyone had a restful break.

As you may have seen, we received 43 unique public comment responses to the Initial Report. The Support Staff organized the submitted comments using the [GNSO Public Comment Review Tool (PCRT)](https://community.icann.org/display/EOTSFGRD/Public+Comment+Review+Tool), the standard tool used across all policy development working groups.

Comments can also be viewed via the Google Spreadsheet, which includes the comments directly submitted using the Google form and Word/PDF versions of the Google Form that were manually added by the Support Team. The Google Spreadsheet provides a neat way to scan through proposed edits and rationale on any of the Recommendations and Questions.

The PCRT includes the comments and rationale from the Google Form. Free-form comments made in email or letter submissions can be found on the [wiki page](https://community.icann.org/display/EOTSFGRD/Public+Comments+on+Initial+Report) under input received. The Support Team will also add these comments separately to the PCRT under the General Comments page.

There is a separate PCRT page for each draft policy recommendation (and the initial recommendation is sub-divided into each purpose statement).

Each of the PCRT pages sort each comment received into four categories used within the Google Form:

1. Support recommendation as written
2. Support intent of recommendation with edits
3. Intent and wording of this recommendation requires amendment
4. Delete recommendation

The pie chart at the top of each PCRT page shows the support for each of the four categories above, and as you scroll through the document, you are able to view each comment submitted on the respective recommendation. The comment will include proposed edits (if applicable) as well as the provided rationale and additional commentary (if any).

Even though the PCRT will make our work easier, it remains our responsibility to:

* give due consideration to all input received, and
* base changes, if any, in response to the input provided.

Given the time allotted to our work and the deadlines imposed, the following is suggested as an efficient and comprehensive approach to review the comments. (We remain open to alternative approaches.)

1. Comment review. Each EPDP team member will review the PCRT pages, called out in the meeting agendas so that you are familiar with all comments received. (Each constituency group might coordinate and divide the work among your group). It is important to review all comments. The Google Forms might be reviewed also if that is helpful.
2. Identify novel arguments. In your review, please capture and note any new ideas, new information, new arguments, and new comments that you think should be added to our discussion. By “new” we mean arguments or points not made in our meetings to date. The objective is for the team to discuss new information during plenary meetings, and not spend limited meeting time repeating deliberations already conducted.
3. Review the proposed recommendation. In order to better manage time, it is proposed to bifurcate the discussion, i.e., hear from those who support a recommendation (as written or with edits), and those who do not support a recommendation (either requiring substantial amendment, change of intent, or deletion). Given the extent of the discussion to date, changes should be based on new information found in the comments.

Open questions where the Initial Report identify where differences exist will necessarily be handled in a somewhat different manner.

As previously noted, all EPDP Members are responsible for thoroughly reviewing all comments.

Go-forward Plan:

As the Purposes for Processing Registration Data underlie each of the other Recommendations, it is necessary to review them first. It is likely that we will try to conduct consensus calls as we review each “Purpose” or Recommendation.

For our meeting on Thursday, 3 January, we will briefly review this methodology; then please come prepared to discuss Purpose 1 and Purpose 3 (starting where comment generally support the Recommendations). For ease of reference, we have included a breakdown of the provided positions from the public comment submissions below.

I hope you find this a useful way to proceed. Please come back to Rafik, the Support Team and me with comments, suggestions or questions.

Best regards,

Kurt & Rafik

**Purpose 1**

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| **PURPOSE 1**  *As subject to Registry and Registrar terms, conditions and policies, and ICANN*  *Consensus Policies:*  *• To establish the rights of a Registered Name Holder in a Registered Name;*  *• To ensure that a Registered Name Holder may exercise its rights in the use*  *and disposition of the Registered Name; and*  *• To activate a registered name and allocate it to a Registered Name Holder;* | | | |
| **Support as written** | **Support with edits** | **Requires Amendment** | **Requires Deletion** |
| * ALAC * DR. JAIDEEP KUMAR MISHRA; DIRECTOR MINISTRY OF ELECTRONICS AND INFORMATION TECHNOLOGY, GOVERNMENT OF INDIA * BC * Tim Chen; DomainTools * A. Mark Massey; Domain Name Rights Coalition * Farzaneh Badii; Internet Governance Project * Tucows Domains Inc. * Michele Neylon; Blacknight Internet Solutions Ltd * Sara Bockey; GoDaddy * Volker Greimann; Key-Systems GmbH * RrSG * Domain.com, LLC & affiliates * NCSG * Lars Steffen; eco – Association of the Internet Industry * Wolf-Ulrich Knoben; ISPCP Constituency * David Martel * Etienne Laurin * SSAC | * IPC * Dean S. Marks; Coalition for Online Accountability * Lori Schulman Senior Director, Internet Policy; International Trademark Association (INTA) * Jeremy Dallman, David Ladd – Microsoft Threat Intelligence Center; Amy Hogan-Burney, Richard Boscovich – Digital Crimes Unit; Makalika Naholowaa, Teresa Rodewald, Cam Gatta – Trademark; Mark Svancarek, Ben Wallace, Paul Mitchell – Internet Technology & Governance Policy; Cole Quinn – Domains and Registry; Joanne Charles – Privacy & Regulatory Affairs; Microsoft Corporation * George Kirikos; Leap of Faith Financial Services Inc. * RySG * Brian King; MarkMonitor, Inc., a Clarivate Analytics company * Monica Sanders; i2Coalition * Greg Aaron; iThreat Cyber Group * Neil Fried; The Motion Picture Association of America * Sajda Ouachtouki; The Walt Disney Company | * Sivasubramanian Muthusamy; Internet Society India Chennai * John Poole; Domain Name Registrant |  |

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| **PURPOSE 3**  *Enable communication with and/or notification to the Registered Name Holder*  *and/or their delegated agents of technical and/or administrative issues with a*  *Registered Name;* | | | |
| **Support as written** | **Support with edits** | **Requires Amendment** | **Requires Deletion** |
| * ALAC * Tim Chen; DomainTools * A. Mark Massey; Domain Name Rights Coalition * Farzaneh Badii; Internet Governance Project * NCSG * Monica Sanders; i2Coalition * David Martel * Etienne Laurin * Greg Mounier on behalf of Europol AGIS; Europol Advisory Group on Internet Security | * Sivasubramanian Muthusamy; Internet Society India Chennai * DR. JAIDEEP KUMAR MISHRA ; DIRECTOR MINISTRY OF ELECTRONICS AND INFORMATION TECHNOLOGY, GOVERNMENT OF INDIA * IPC * Dean S. Marks; Coalition for Online Accountability * Lori Schulman Senior Director, Internet Policy; International Trademark Association (INTA) * BC * Jeremy Dallman, David Ladd – Microsoft Threat Intelligence Center; Amy Hogan-Burney, Richard Boscovich – Digital Crimes Unit; Makalika Naholowaa, Teresa Rodewald, Cam Gatta – Trademark; Mark Svancarek, Ben Wallace, Paul Mitchell – Internet Technology & Governance Policy; Cole Quinn – Domains and Registry; Joanne Charles – Privacy & Regulatory Affairs; Microsoft Corporation * George Kirikos; Leap of Faith Financial Services Inc. * Tucows Domains Inc. * Michele Neylon; Blacknight Internet Solutions Ltd * Sara Bockey; GoDaddy * Volker Greimann; Key-Systems GmbH * RrSG * Domain.com, LLC & affiliates * RySG * Brian King; MarkMonitor, Inc., a Clarivate Analytics company * Lars Steffen; eco – Association of the Internet Industry * Wolf-Ulrich Knoben; ISPCP Constituency * SSAC * Neil Fried; The Motion Picture Association of America * Sajda Ouachtouki; The Walt Disney Company |  | * John Poole; Domain Name Registrant |