

“Triage” Report: Expedited Policy Development Process for gTLD Registration Data

Executive Summary

The first deliverable of the EPDP Team is a “triage” document of the Temporary Specification, which includes items that have the Full Consensus support of the EPDP Team: that these should be adopted as is (with no further discussion or modifications needed). (See the EPDP Charter at <https://gnso.icann.org/sites/default/files/file/field-file-attach/temp-spec-gtld-rd-epdp-19jul18-en.pdf>.)

Based on the results of a section-by-section survey completed by the EPDP Team, there are very few areas where the consensus opinion of the EPDP Team agrees with the current language in the Temporary Specification. *There were several areas of agreement with the underlying principles in several sections of the Temporary Specification; in particular, there was no opposition to redacting the data elements the temp spec designates.* However, where a constituency / stakeholder group / advisory committee did indicate support for a certain section of the Temporary Specification, edits were often suggested, meaning that essentially no section of the Temporary Specification will be adopted without modifications.

That does not mean that this Triage report and the surveys and discussion that formed the basis for the report are without value. There are several takeaways that will inform the EPDP Team’s work on the Initial Report:

1. Several comments made by the Team members indicated how the sections should be ordered for the next round of discussion; this should serve as a basis for a more efficient discussion going forward.
2. The rationale provided by Team members in support / opposition of each section can be used in some cases to narrow the discussion to particular issues. Similarly, specific suggestions were made in some cases for how sections could be modified, which could form a basis for further deliberation.
3. The Team now has a library of each group’s positions on and issues with a variety of topics.

Major themes that were raised during the discussion include:

1. The Temporary Specification is “GDPR-centric” and its successor should take into account or make allowance for emerging privacy regulations in other jurisdictions.
2. The effect of GDPR compliance requirements on entities outside the EEA requires better understanding and handling.

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- 3. The Temporary Specification refers to “processing” data but, to be clear, the successor specification should consider further delineating among the different processing options such as collection, use and disclosure
- 4. There is some confusion regarding the transition from a temporary specification to its replacement and the effect of that on time-sensitive sections of the Temporary Specification: e.g., the implementation date, reference to an Interim model and other clauses that would not belong in the replacement specification.
- 5. Recent and ongoing advice received from EDPB will cause the team to reconsider the language in Section 4.4 et. seq., the purposes for processing data.
- 6. Some sections are considered too prescriptive where actual implementation depends on business model, evolving GDPR interpretation and privacy regimes in other jurisdictions. Compliance with GDPR will differ among data controllers.
- 7. There is a difference among registration data (Whois data), data used to register domains and zone file data. The successor specification should recognize that distinction and deal with them appropriately.
- 8. ICANN relies on its mission and bylaws to justify the requirement that registration data be disclosed in certain circumstances, but the EPDP team seeks supplemental information from ICANN to make it clear why the mission and bylaws make such disclosures necessary.
- 9. [There was general agreement that the GDPR-replacement dispute resolution \(URS and UDRP\) and transfer processes were operating well and small or no changes were expected in the Temporary Specification. An examination regarding which personal data elements are required for those services will occur in the “access” portion of the EPDP.](#)

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The requirement from the EPDP Team Charter

(see, <https://gns0.icann.org/sites/default/files/file/field-file-attach/temp-spec-gtld-rd-epdp-19jul18-en.pdf>)

The first deliverable of the EPDP Team shall be a triage document of the Temporary Specification, which includes items that have the Full Consensus support of the EPDP Team that these should be adopted as is (with no further discussion or modifications needed). These items need to be:

1. In the body of the Temporary Specification (not in the Annex)
2. Within the "picket fence" (per limitations on Consensus Policy as set out in the Contracts)
3. Not obviously in violation of the GDPR / Assumed to be compliant with GDPR [Presumed to be legal according to the members’ best knowledge of GDPR]
4. Consistent with ICANN’s Bylaws

A brief description of the methodology for compiling information for this report

The EPDP Team members completed a survey that, on a section-by-section basis of the Temporary Specification, indicated whether they:

1. agreed with the section as written
2. disagreed with the section as written
3. had no strong opinion

Implementation notes:

1. Some similar sections were combined in the survey for efficiency.
2. Each constituency / stakeholder group / advisory committee completed one survey.
3. The survey sections were divided into four separate surveys so that first inputs could be received and reviews could begin sooner.

Each constituency / stakeholder group / advisory committee was then asked to provide rationale or reasoning for their opinion, at least in cases where they disagreed with the language. They were afforded the opportunity to suggest alternate language.

The EPDP Leadership and Support team reviewed the responses and rationale, and created an “issue summary” for each survey section. The issue summaries and the text of each of the responses were published prior to each Team meeting. During EPDP Team meetings the comments and issue summaries were reviewed to ensure written comments were correctly understood. The EPDP Team was also furnished with a summary chart (see below) indicating which teams supported individual Temporary Specification sections.

After the first meeting, it was realized there would be few areas of consensus that sections were supported as written so it was decided to not spend time attempting to reach consensus on any section during the triage stage.

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A summary chart indicating which teams supported individual Temporary Specification sections

Acknowledging that consensus is not achieved by vote, it is instructive to graphically portray when the groups agreed (or not) with each report section.

	IPC	GAC	NCSG	RrSG	ISPCP	BC	ALAC	RySG	SSAC
Sections 1.1., 1.2., 1.3.	Yes	Yes	No	Yes	No	Yes	Yes	No	Yes
Section 2.	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes
Section 3.	Yes	Yes	Yes	NSO	No	Yes	Yes	No	NSO
Sections 4., 4.1., 4.2.	Yes	Yes	No	No	No	Yes	Yes	No	Yes
Section 4.3.	Yes	Yes	No	No	No	Yes	Yes	No	Yes
Section 4.4., 4.4.1.	No	No	Yes	No	Yes	Yes	Yes	No	Yes
Section 4.4.2.	Yes	Yes	No	No	No	Yes	Yes	No	Yes
Section 4.4.3.	Yes	Yes	NSO	No	No	Yes	Yes	No	Yes
Section 4.4.4.	Yes	Yes	Yes	No	No	Yes	Yes	No	Yes
Section 4.4.5.	Yes	Yes	No	No	No	Yes	Yes	No	Yes
Section 4.4.6.	Yes	Yes	No	No	No	Yes	Yes	No	Yes
Section 4.4.7.	Yes	Yes	Yes	No	No	Yes	Yes	No	Yes
Section 4.4.8.	Yes	No	NSO	No	No	Yes	Yes	No	Yes
Section 4.4.9.	Yes	No	Yes	NSO	No	Yes	Yes	No	Yes
Section 4.4.10.	Yes	Yes	Yes	No	No	Yes	Yes	No	Yes
Section 4.4.11.	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes
Section 4.4.12.	Yes	Yes	Yes	NSO	Yes	Yes	Yes	No	Yes
Section 4.4.13.	No	Yes	Yes	No	No	Yes	Yes	No	Yes
Section 4.5., 4.5.1. - 4.5.5.	Yes	Yes	No	No	No	Yes	No	No	Yes
Sections 5.1, 5.2	Yes	Yes	No	No	No	No	No	No	Yes
Sections 5.3 - 5.5	Yes	Yes	Yes	No	No	Yes	No	No	Yes
Section 5.6	Yes	Yes	Yes	No	No	No	No	No	Yes
Sections 6.1 - 6.3.2	Yes	No	Yes	NSO	No	No	Yes	NSO	Yes
Sections 7.1 - 7.1.8	Yes	No	No	No	No	Yes	Yes	No	Yes
Sections 7.1.9 - 7.1.15	Yes	Yes	Yes	No	No	Yes	Yes	No	Yes
Sections 7.2 - 7.2.4	No	No	No	No	No	No	Yes	No	Yes
Sections 7.3, 7.4	Yes	Yes	No	No	Yes	Yes	Yes	No	No
Appendix A 1., 1.1., 1.2., 1.2.1., 1.2.2.	Yes	No	NSO	No	No	Yes	Yes	No	Yes
Appendix A 2., 2.1. - 2.3.	No	No	Yes	No	No	No	No	No	No
Appendix A 2.4., 2.5., 2.5.1. - 2.5.1.3., 2.5.2., 2.6.	No	No	Yes	No	No	No	Yes	No	No
Appendix A 3.	No	No	NSO	No	Yes	No	Yes	Yes	No
Appendix A 4., 4.1., 4.2.	Yes	No	Yes	Yes	No	Yes	Yes	Yes	No
Appendix A 5.	Yes	Yes	NSO	Yes	Yes	Yes	NSO	No	Yes
Appendix B, #1	Yes	Yes	No	No	No	Yes	Yes	No	Yes
Appendix B, #2	Yes	Yes	Yes	No	Yes	Yes	No	No	Yes
Appendix B, #3	Yes	Yes	NSO	Yes	No	Yes	Yes	No	Yes
Appendix B, #4	Yes	Yes	NSO	Yes	No	Yes	Yes	Yes	Yes
Appendix F	Yes	Yes	NSO	Yes	No	NSO	Yes	Yes	Yes
Appendix D: URS	Yes	Yes	No	NSO	Yes	Yes	Yes	Yes	Yes
Appendix E: UDRP	Yes	Yes	No	NSO	Yes	Yes	Yes	Yes	Yes
Appendix G: Transfer Policy	Yes	Yes	NSO	No	Yes	No	No	No	No
Appendix G: Transfer Policy	Yes	Yes	NSO	NSO	Yes	Yes	Yes	No	Yes

Any such chart requires explanation.

1. Importantly, there was often agreement on broad principles, but those areas of agreement are hidden in this chart where the combination of sections into one line item or suggested minor edits resulted in “not supporting the language as written.”

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2. The Registry Stakeholder Group thought the Temporary Specification should be revisited given recent correspondence from the European Data Privacy Board and the effect that has had on preconceived notions of compliance vs. non-compliance.
3. The Intellectual Property and Business Constituencies and the At-Large Advisory Committee, when agreeing with a section, often proposed revised wording.
4. The Registry Stakeholder Group, when disagreeing with a section, often voiced general agreement but with certain changes recommended.

Therefore, the color-coding is not precisely or well-correlated to the degree of support.

A section-by-section report including a summary of issues raised by the team

Section 1, Scope: The bolded part of the following section is considered problematic: “To the extent there is a conflict between the requirements of this Temporary Specification and the requirements of Registry Operator's Registry Agreement and Registrar's Registrar Accreditation Agreement, the terms of this Temporary Specification SHALL control, *unless ICANN determines in its reasonable discretion that this Temporary Specification SHALL NOT control.*”

1. Why was this term included – conflicts yet to be discovered? Future changes in GDPR implementation advice? Some reason germane only to the Temporary Specification and not its successor?
2. Should the team consider its deletion as it re-writes the specification?

Section 2, Definitions: Definitions might change in the successor specification.

1. Is reference to the "Interim model" necessary?
2. Should "Registration Data" be defined with more specificity?

Section 3: Policy Effective Date: Should the effective date of the Temporary Specification be replaced by the effective date of its successor, i.e., the date of ICANN Board approval?

Sections 4.1-4.3, Lawfulness & Purposes of Processing gTLD Registration Data

1. Do ICANN's Bylaws and its role described in the Temporary Specification extend beyond ICANN's remit?
2. Do the ICANN Bylaws and Mission provide the necessary authority to justify its role to mandate personal data processing (i.e., collection, use and disclosure) as described in the Temporary Specification?
3. Should these introductory sections be re-examined *after* the analysis of the sections 4.4 et. seq. is completed by the EPDP Team and so that potential changes to those sections can be taken into account?

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1. I.e., is it more important to first determine when the purposes, the uses & disclosure of data are legitimate and not overridden by fundamental rights as laid out in the GDPR?
2. Are these paragraphs relevant to the purpose of the Temporary Specification or can they be published outside it?

Section 4.4, 4.4.1-4.4.2, Lawfulness & Purposes of Processing gTLD Registration Data:

1. Section 4.4, a preamble to the list of purposes for which personal data can be processed states that data can be disclosed, "... for only the following legitimate purposes." Does this unnecessarily limit the Temporary Specification as additional legitimate uses of data are determined or new privacy regimes are introduced in future years?
2. Section 4.4.2 seems to be a catchall provision that cures the issue created by "... for only the following legitimate purposes," by allowing any data disclosure purpose when legitimate and not overridden by fundamental rights. Is that the purpose of this provision? Would it be better form to replace 4.4.2 with language in the preamble (sec 4.4) that indicates other legitimate purposes in the future are possible?
3. Does section 4.4.1 adequately test data requests against the rights of individuals and the need to narrowly tailor personal data disclosures to the "necessity"?
4. GDPR indicates that LEA access to personal data needn't pass the test that data requests can be disclosed only when legitimate and not overridden by fundamental rights. Should the preamble in sec 4.4 refer to Art.6 of the GDPR as exempting LEA access from the requirement?

Section 4.4.3, for contacting registrants: In reference to the clause that registration data provides a mechanism for “identifying and contacting” registrants, registrars indicate that they use registration data only to “contact” registrants, not "identify" them. Should “identify” be deleted?

Section 4.4.4, for communication & invoicing: In reference to the clause that registration data provides a mechanism for communication and invoicing, registrars indicate they do not use registration data for this purpose. Should this clause be struck?

Section 4.4.5, to address technical and content issues: In reference to the clause that registration data provides a mechanism for technical issues, errors, or content or resources associated with a registered name:

1. What are the types of "content" issues should be allowable or disallowed as part of this section”?
2. What is the actual flow of data requests: i.e., the registrars’ role and the actual use of registration data in these types of requests?

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Section 4.4.6, to address changes to the domain:

1. In reference to the clause that registration data provides a mechanism for communication about commercial or technical changes to the domain, registrars indicate they do not use registration data for this purpose. Should this clause be struck?
2. The clause also indicates that registries have the same reason for contacting registrants. Does this require registration data?

Section 4.4.7, regarding the voluntary provision of administrative and technical contact data:

1. Does the utility of this voluntary data submission outweigh the requirement for data minimization?
2. Can consent be obtained from administrative and technical contacts where no direct relationship exists?

Section 4.4.8, to combat abuse and protect intellectual property: It was noted that this section is too broadly written and additional detail is required to govern this area. Is the list of purposes for data disclosure (i.e., DNS Abuse, cybercrime and intellectual property theft) consistent with ICANN’s mission?

Section 4.4.9, to provide LEA access: There was a statement made that LEA access to personal data needn't pass the balancing test of Article 6(1)(f) – that data can be disclosed when considered legitimate and not overridden by fundamental rights.

1. Should the preamble (section 4.4) refer to Art.6 of the GDPR?
2. Must LEAs demonstrate the right to access data?

Section 4.4.10, zone-file data: Zone-file data is considered part of registration data as it is generated automatically and not provided by the registrant. Should this section, in a document governing the processing of registration data, be deleted?

Section 4.4.11, to address business or technical failure: In reference to the clause that registration data provides a mechanism for safeguarding registration data in the “event of a business or technical failure, or other unavailability of a Registrar or Registry Operator”:

1. Is it accurate to say there is general approval of this data use so long as ICANN does not have access to the registration data?
2. Should “other unavailability” be deleted as redundant or vague?

Section 4.4.12, to facilitate dispute resolution services: There appears to be support for this section.

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Section 4.4.13, to facilitate contractual compliance: Regarding ICANN access to data for contractual compliance purposes, should ICANN be required to provide details to identify specific data that are needed for specifically identified compliance tasks?

Section 4.5.1-4.5.5, Rationale for Processing gTLD Registration Data: For this rationale supporting the specified purposes for data processing that are permitted under this specification, those not supporting this provision found the rationale unconvincing.

1. Is this rationale necessary to this specification or should it be published outside it?
2. Would this section be more effectively reviewed after the review of data processing purposes in section 4.1. et.seq.?

Section 5.1: Regarding providing public access to registration data, those not yet commenting on this provision noted per the charter, sections related to access cannot be discussed until all gating questions are answered.

Section 5.2: Regarding Registrar and Registry Operator Service Level Agreements, should these Service Level Agreements be removed (due to the picket fence) or amended to reflect agreed-upon timelines (where the Temporary Specification requirement date has passed)?

Section 5.3-5.4: In reference to the requirements to comply with Appendix B and Appendix C, there is little disagreement on the language incorporating the aforementioned appendices; however, groups may oppose the language in the appendices. (See, *infra*, notes on Appendix B and Appendix C).

Section 5.5: In reference to international data transfers between ICANN and its contracted parties, does the section adequately address all possible combinations of countries involved in data transfer?

Section 5.6: In reference to the requiring contracted parties to comply with the additional Uniform Rapid Suspension in Appendix D requirements, should this section be discussed after the full discussion of Appendix D has taken place?

Section 5.7: Regarding the requirement for registries and registrars to provide reasonable access of registration data to ICANN Compliance:

1. What does “reasonable” access mean in this context?
2. Why does ICANN Compliance need registration data (and if so, specifically which data) to enforce compliance with the registrar accreditation agreement and the registry agreement?

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Section 6: Regarding the requirements for Registry Operators:

1. Should the EPDP Team reserve commenting on Section 6.1 until the text of Appendix F has been reviewed comprehensively?
2. Does the term “periodic access” in Section 6.1 require more clarity or be separately negotiated?
3. Does the term “reporting requirements” in Section 6.2 require more specificity or be separately negotiated?
4. Does the term “international data processing” in Section 6.3 require more clarity?
5. Should data minimization principles be applied to Section 6.1 – 6.2?

Section 7.1. Notices to Registered Name Holders Regarding Data Processing:

1. Is the language in Section 7.1 too prescriptive, i.e., is compliance with every term always necessary and sufficient to comply with GDPR? Is a general requirement that the notice be GDPR compliant more appropriate, given different business models and different jurisdictions?
2. Should this section about notices reference ICANN’s role as a data processor?
3. Should the terms “consent” and “legitimate interest” be further defined?

Section 7.2 Additional Publication of Registration Data:

1. Is more clarity needed around the purpose for collection of “additional contact information”?
2. Does the term consent and how contracted parties receive consent need to be further defined to comply with GDPR requirements? Are the terms in 7.2.3 necessary and sufficient?
3. Receiving and recording consent from multiple parties (not the registrant) is very difficult. How can this be addressed in this context?

Section 7.3-Uniform Domain Name Dispute Resolution Policy: All groups found the language in 7.3 to be acceptable or had no strong opinion. Agreement to the language in Section 7.3, however, does not equate to the agreement of all language in Appendix E.

Section 7.4-Transfer Policy: Groups expressed concerns with the supplemental procedures in the Transfer Policy (*see, infra*, notes on Appendix G).

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Appendix A.1: Registration Data Directory Services

1. All parties agree that RDAP will be implemented. Should the date for SLA definition (31 July 2018) be deleted or amended since it has passed? Will any date be germane in the successor document?
2. There is some uncertainty as to whether a search capability is / should be a contractual requirement. Is the Search Capability paragraph (which places GDPR-required restrictions on the use of search) necessary?
3. Do the restrictions in this section address the risks associated with the aggregation of data?

Appendix A, Registration Data Directory Services – sections 2.1, 3:

1. Is section 2.1 (coupled with sec. 3) is overly broad in that: (1) GDPR data restrictions can be applied globally and include entities (registrars, registries, registrant) located outside the EEA, and (2) data restrictions need not be applied to Legal persons where personal data is not included in the record? Or is it appropriately written given that the legal/natural distinctions cannot be made a priori and attempting to distinguish these differences is not implementable? What are the operational / implementation issues for registrars?
2. Should “thin” registries should be required to move to “thick” as part of this Temporary Specification?

Appendix A section 2.2: Why is the date for privacy language implementation delayed until RDAP implementation? Can it be required sooner?

Appendix A section 2.3: Should data in addition to what is specified in the Temporary Specification be redacted (e.g., organization name, city, postal code) as personal information can be gained from them? The Temporary Specification mentions "consent" without a requirement or specification for such. Should this group take that up?

Appendix A section 4: While parties generally support this section:

1. What is meant by "reasonable" access? Should “reasonable” be deleted?
2. There is concern that individual decisions or rulings will be construed as rules of law and be implemented haphazardly by registrars. Instead, should case law be interpreted and used to make a single rule-set for all registrars?
3. Should this section be placed under sec 4.4 as is it applies to the "access" issue?

Appendix A section 5: There is strong support for the publication of additional data fields:

1. Should there should be some measure of standardization of the output?
2. Is inclusion of Appendix C problematic and should the team revisit this language when Appendix C is reviewed?

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Appendix B Supplemental Data Escrow Requirements Section 1:

1. Is this Appendix necessary since data escrow requirements differ from WHOIS data?
2. Should this Appendix be rewritten to reflect / include ICANN org as a data controller?
3. Is a privacy impact assessment of ICANN org’s data escrow agreements needed?

Appendix B Supplemental Data Escrow Requirements Sections 2-4:

1. In reference to Section 2, there are parallels to be drawn between data escrow transfers between countries and WHOIS data transfers between countries, i.e., are they both subject to the safeguards listed in GDPR Chapter V and what are the implications of that to Whois access?
2. As data escrow is governed by a set of agreements among ICANN, the contracted parties, and data escrow agents, should this negotiation be left for the relevant parties to negotiate separately, outside of this EPDP?

Appendix D: Uniform Rapid Suspension:

1. Should the language "participate in another mechanism" in Section 1.1 be clarified or eliminated?
2. Does the language in section 1.2 (for thin registries) create possible incompatibilities with existing URS procedures?
3. There is currently no processing agreement with an Asian URS providers in place. Is this an issue for the EPDP Team?
4. Does the term "contact information" in Section 2 of Annex D need to be further defined?
5. Should language allowing the Complainant to file an amended URS Complaint following receipt of registration data be included in Section 2?
6. Is the review of Appendix D more appropriately addressed by the RPM PDP, and timing, i.e., should the review of Appendix D be deferred until after the EPDP Team deliberates on the access model/framework?
7. Does Section 2 of Appendix D need additional safeguards to ensure against abuse, i.e., a complainant filing "doe complaints" in an attempt to get registration data?

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Appendix E: Uniform Domain Name Dispute Resolution Policy:

1. Should the language "participate in another mechanism" in Section 1.1 be clarified or eliminated?
2. Does the language in section 1.2 create possible incompatibilities with existing UDRP procedures?
3. Does Section 2 of Appendix E require additional safeguards to ensure against abuse, i.e., a complainant filing "doe complaints" in an attempt to get registration data?
4. Should language allowing the Complainant to file an amended UDRP Complaint following receipt of registration data be included in Section 2 of Appendix E?
5. Is the EPDP Team's review of Appendix E more appropriately addressed by the RPM PDP, and timing, i.e., should the review of Appendix E be deferred until after the EPDP Team deliberates on the access model/framework?

Appendix F: Bulk Registration Data Access to ICANN: Should this processing activity be analyzed for legitimate purpose and legal ground since domain names may be personal data?

Appendix G: Supplemental Procedures to the Transfer Policy Section 1:

1. Does the revised transfer process create new security risks and vulnerabilities such as domain name theft and hijacking, and if so, should the EPDP Team address this as part of the work of this EPDP?
2. Should this Team's consideration be affected by existing efforts to replace/modify the Transfer Policy?
3. Does Section 1.2 of Appendix G, imposing redundant processes on the registrant, overly denigrate the user experience? Is there an alternative?
4. Should the language "to be offered" be removed from Section 1 to avoid confusion?

Appendix G: Supplemental Procedures to the Transfer Policy Section 2-3:

1. Is additional language necessary to ensure registry operators are able to process auth-code changes in bulk?
2. Does the language "best practices" in Section 3 require additional clarity?

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TRIAGE APPENDIX:

A section-by-section report including a summary of issues raised by the team as well as the written comment of each constituency / stakeholder group / advisory committee