Registrar Stakeholder Group (RrSG) EPDP Team Feedback to Phase 2 Mind Map

The RrSG EPDP team appreciates the opportunity to comment on the Phase 2 Mind Map and offer suggestions for how to move forward. We have formatted our response to answer your specific questions.

How should the team prioritize going forward?

First and foremost, all outstanding legal advice/guidance from Phase 1 must be obtained and reviewed prior to commencing any work to address a standardized model for lawful disclosure of personal data. Once all legal guidance is received, the work to create a System for Standardized Access to Non-Public Registration Data should be done in parallel with the Issues Deferred from EPDP Phase I and Important Issues for Further Community Action. This is not to say that deferred issues cannot be discussed as soon as a Phase 2 Chair has been seated, but that discussion regarding access should be on hold until all necessary legal guidance has been obtained.

For the System for Standardized Access, the sequence should be as follows:
1. Identify and document any legitimate purpose for a third-party to access non-public personal data (item "a" on the mind map)
2. Credentialing and terms of access and use

Deferred issues and important issues for community action should be prioritized based on if they involve the disclosure of any personal data:
1. Display of City field
2. Legal vs Natural" question
3. Unique contacts having uniform email addresses

What next steps should be taken in relation to the dependencies identified?

The dependencies are for external input, so those stakeholders should be consulted as soon as possible and their responses considered as soon as they come in.

What should be the next steps in relation to the legal guidance to date?

Review of existing guidance should be a priority in Phase 2 as it will inform further discussions. Legal guidance should be compared against recommendations/open topics to ensure everything is aligned. Where it is not aligned, the WG should discuss/review further as a team.

What is the target date for publication of the Initial Report that the EPDP Team is aiming to work toward?

This date should not be externally imposed, and the EPDP team can only come to a target date after the work plan has been clearly laid out and agreed on by the team. The next step should be to form the work plan.